

**SOUTH STAFFORDSHIRE LOCAL PLAN  
PUBLICATION PLAN APRIL 2024  
REGULATION 19 CONSULTATION**

**LAND AT BRATCH COMMON ROAD,  
WOMBOURNE**

**REPRESENTATION PREPARED ON BEHALF OF**

**ST PHILIPS**

P20-1302



## Document Management.

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# 1. Introduction

- 1.1. This representation responds to the South Staffordshire District Council's ('SSDC') Local Plan Review 'Publication Plan' ('the Plan') consultation held under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This is the second Regulation 19 Publication Plan published for consultation by SSDC and follows amendments made to the National Planning Policy Framework (NPPF) in 2023, resulting in a review of the Council's Spatial Strategy across the Plan Period.
- 1.2. Representations are made with regard to the Plan itself and to the accompanying published evidence, having regard to the NPPF.
- 1.3. This representation is made by Pegasus Group on behalf of St Philips who have a specific land interest in land at Bratch Common Road, Wombourne, which has capacity to deliver up to 250 dwellings ('the Site').
- 1.4. St Philips has previously submitted details of the Site alongside detailed representations to the Issues and Options and the Spatial Housing Strategy and Infrastructure Delivery consultation in October 2019; to the Regulation 18 Preferred Options consultation in December 2021 and to the Regulation 19 Submission Plan consultation in 2022.
- 1.5. The Site extends to approximately 28 hectares and is located to the northwest of Wombourne (Site Location Plan attached at Appendix 1) but immediately adjacent to the settlement's north western boundary. The Site is bounded by Bratch Common Road and Trysull Road on its southern and western boundaries, with the north and western edges adjacent to open countryside beyond. The Site comprises two agricultural fields with field boundaries defined by hedgerows and tree lines. A public right of way runs alongside the south and eastern edges of the site.
- 1.6. The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The latest iteration of the NPPF (December 2023) sets out at Paragraph 230 guidance on implementation and interim arrangements in relation to national policy. This sets out that where emerging local plans reach pre-submission consultation prior to 19th March 2024, plans will continue to be examined in the context of the previous September 2023 iteration of the Framework. Due to the publication of this round of consultation in April 2024, SSDC have prepared the Plan under the provisions of the latest NPPF December 2023, and these representations have been prepared accordingly having regard to this national policy context. To ensure the policies of the Plan are fully justified it is important that Plan policies are consistent throughout with this new national policy framework.
- 1.7. The tests of soundness are set out at NPPF Paragraph 35. For a Plan to be sound it must be:
  - a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's 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;
  - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;



- c) **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
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.8. The representations also address the legal and procedural requirements associated with the plan-making process.

## 2. Planning Policy Context

- 2.1. St Philip's support SSDC's review of the adopted South Staffordshire District Development Plan as required by Policy SAD1 of the Site Allocations Document ('SAD') 2018. This provides the opportunity for the Council to comprehensively review the Vision, Strategic Objectives, development requirements, spatial development strategy and policies shaping detailed development proposals.
- 2.2. The Plan review also provides the opportunity for the Council to not only revisit its own objectively assessed housing need, but also the role of the District in meeting unmet cross boundary needs from the wider Greater Birmingham and Black Country Housing Market Area ('GBBCHMA').

### National Requirements for Plan-Making

- 2.3. The existing Core Strategy for South Staffordshire was adopted in 2012, and as such a holistic review of the Plan is overdue. A Local Plan review is also committed to within the Site Allocations Document 2018.
- 2.4. NPPF para 24 confirms that local planning authorities are "*... under a duty to so-operate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. ...*". In the context of South Staffordshire, strategic matters include housing, employment, infrastructure and the Green Belt.
- 2.5. NPPF para 33 requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years. The proposed timescales, as set out in the Local Development Scheme (September 2023), will ensure that an up-to-date Local Plan for South Staffordshire will be in place to support growth and meet future development needs across the Plan period.
- 2.6. The Publication Plan consultation follows previous consultations on the Local Plan review. This included representations in 2019 to the Spatial Housing Strategy & Infrastructure Delivery document, along with consultation on the Preferred Options Regulation 18 Plan in 2021 and previous Publication Plan in 2022.
- 2.7. Amendments to the National Planning Policy Framework (NPPF) in December 2023 led to a review of the District's proposed spatial strategy across the Plan Period, resulting in the current version of the Publication Plan (2024). St Philips have engaged at each stage of the plan making process.
- 2.8. The current consultation document represents SSDC's final version of the Plan and is being made in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), having considered representations previously made to the earlier Publication Plan in 2022, as well as further evidence.
- 2.9. St Philips support SSDC's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists within the District to guide growth to 2041 and to ensure that development is genuinely plan-led but would like to make some detailed representations on the soundness of some parts of the Plan.

### 3. Vision, Strategic Objectives and Priorities

- 3.1. The Publication Plan (Regulation 19) identifies a number of 'Issues and Challenges' surrounding homes and communities, economic prosperity and the natural and built environment. The Document goes on to present a 'Vision' based upon these issues and challenges, and a number of 'Strategic Objectives' by which the Vision can be achieved.
- 3.2. It is noted that the Vision remains broadly the same as that presented in the adopted Core Strategy with regards to the aspirations to protect and enhance the District's rural character, communities, and landscape.
- 3.3. The Plan's Vision and Objectives should be amended to reflect the need to meet both the present and future housing requirements, including those pressures arising through the Duty to Co-Operate with neighbouring authorities. In this instance, the well-known unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) should be clearly considered. This matter is considered further later in these representations.
- 3.4. Strategic Objective 1 lacks clarity and does not define the exceptional circumstances for release of Green Belt land as part of its strategy. It should be made clear that the need to identify land for growth and development over the Plan period, and beyond, means that there are exceptional circumstances arising which have required a full and detailed Green Belt boundary review, with a view to identifying land that is proposed to be released from the Green Belt to meet the District's and the GBBCHMA's growth requirements.
- 3.5. In relation to Strategic Objective 2, reference is made to meeting the housing and employment needs of the District and a 'proportionate' contribution towards the unmet needs of the GBBCHMA and wider Functional Economic Market Area. It is considered this could be strengthened in meeting the needs of both existing and new residents of the District and the GBBCHMA. The overarching thrust that new housing should be focussed in sustainable locations in the District, and in particular the District's most sustainable Tier 1 settlements is supported. However, to achieve balanced and sustainable growth across the District it is important that a range of sites are allocated for housing to ensure a balanced and reliable source of housing supply to meet not only the District's but also the wider HMA's unmet housing need over the Plan period. In determining what is considered to be a proportionate contribution to the HMA's unmet housing needs, SSDC must also ensure specific consideration has been given to the District's ability to make a significant larger contribution to unmet needs given it has a contiguous border with the West Midlands Conurbation. This will ensure the economic and social prosperity of communities throughout the District is supported. Greater recognition should be given to Tier 2 and 3 settlements as well as sites which relate well to the urban areas of adjoining authorities and can benefit from the sustainability of these locations including access to jobs, services, education and public transport provision.
- 3.6. The 'Issues and Challenges for South Staffordshire' as identified through community engagement are identified at Table 2 (page 13) of the Plan. Most notably this highlights the District's 'weaknesses' as

- demographic imbalance with a higher-than-average proportion of residents aged 65+, and a projected decline in families and working age residents, with resultant threat to some service provision;
- reliance on neighbouring areas for higher order services and a dependency on their economic health for access to employment; and
- poor public transport connectivity in parts of the district.

- 3.7. Alongside this, it continues that ‘threats’ to the District include the increasing pressure for development on land within the Green Belt to meet District’s housing needs and the needs of adjoining areas, which if not properly managed, could threaten the quality and character of the district, along with the lack of available brownfield land.
- 3.8. The emerging Plan provides the opportunity to support sustainable growth and positive change for the future of the District. This can be achieved through carefully planned strategic development which embraces the opportunities the District offers through high quality landscape led housing developments, delivering a range of homes to meet a mix of needs as part of balanced communities, whilst also delivering much needed infrastructure improvements across the District. Whilst the importance of brownfield sites is recognised, this balanced alongside strategic growth within open countryside and through Green Belt release is necessary to overcome those weaknesses identified by SSDC, ensuring the social and economic challenges of the District across the Plan period can be addressed in order to strengthen its future through the Plan period and beyond.
- 3.9. Despite acknowledging a current weakness of the District being a higher than average aging population and a decline in families and working age residents which places a threat on service provision across the District, the emphasis continues to be placed on meeting the housing needs of an ageing population, rather than balancing this alongside the delivery of family homes and ensuring the housing needs of the working age population are met across the Plan period.
- 3.10. In addition, contributing a larger proportion of homes towards the unmet housing needs of the GBBCHMA would assist in addressing this balance, improving the affordability of homes (as acknowledged within the conclusions of the Spatial Housing Topic Paper, paragraph 4.10) and encouraging families and first time buyers to move into the District, and particularly within areas located along the eastern edge of the District with the adjoining West Midlands conurbations easily accessible via existing public transport, and in turn supporting existing services whilst also delivering enhanced infrastructure for the District via developer contributions.
- 3.11. SSDC have acknowledged that public transport in parts of the District is poor however, the District benefits hugely from its proximity to the adjoining West Midlands conurbations. Delivering a range of housing sites across the District, particularly those located on or close to key transport infrastructure networks which benefit from access to cross boundary bus and rail services should be promoted. In addition, a range of new housing at villages, including Tier 2 and 3 villages will ensure these settlements can continue to thrive and deliver services and improved infrastructure for existing communities rather than being isolated and forgotten. This should be reflected within the Vision and strategic objectives for delivering development across Plan period.



## 4. Development Strategy

### Policy DS1 – Green Belt

- 4.1. St Philips do not accept the Council's proposition that the Green Belt '*contributes towards rural character*'. Green Belt is a development restraint policy set out at Chapter 13 of the NPPF and is not a landscape or character policy. The NPPF outlines '*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*'. Therefore, the Council should amend the text within Policy DS1 and its supporting text to represent national policy.
- 4.2. In accordance with the Duty to Cooperate, which still remains, the Council must do its utmost to assist in meeting unmet needs across the housing market area, particularly given SSDCs proximity to adjoining West Midlands conurbations. The 2018 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Strategic Growth Study presented a strategic review of the Green Belt across the 'joint authorities' area. This review was undertaken in the light of the shortfall in housing need identified across the area. It was acknowledged that as a significant proportion of land within the Housing Market Area is covered by Green Belt, 'exceptional circumstances' through Local Plan reviews would be required to alter the Green Belt boundaries.
- 4.3. Despite proposing a contribution of 4,000 homes towards the unmet housing need of the GBBCHMA as part of the Reg 19 2022 Publication Plan is now of the view that the Growth Study, on which the 4,000 contribution was based is out of date and requires further review, instead proposing a token contribution of 640 homes towards the unmet HMA need across the Plan period. However, it is evident from the GBBCHMA Position Statement Addendum Update 2023 and evidence prepared by the other HMA authorities in the preparation of their Local Plan Reviews that the unmet need continues to grow.
- 4.4. The GBBCHMA Position Statement Addendum Update 2023 continues to show a significant shortfall in housing delivery (2,053 dwellings shortfall as at 2020/21) across the HMA. It also recognises that the figures it identifies do not reflect the full extent of the housing shortfall particularly given the status of Local Plans across the HMA and the significant impact therefore on supply and housing delivery which will need to be accounted for. The shortfall is therefore likely to be far greater than that reflected within the baseline figures included within the Study.
- 4.5. This is evident through the most up to date housing figures published by the other HMA authorities currently undergoing a review of their Development Plans. In terms of need, Birmingham City Council for example, formally commenced the review of its new Plan and estimated a shortfall of 78,415 homes to 2042 in its Issues and Options (October 2022) document based on the Standard Method. This is a significantly greater shortfall than the housing requirement figure of 37,900 identified within the adopted Birmingham Development Plan 2011-2031.
- 4.6. The GBBCHMA Position Statement Addendum 2023 utilises the housing requirement figures identified by the Black Country Authorities as part of the Regulation 18 Black Country Plan (BCP), estimating 28,239 homes to 2039. Since the collapse of the BCP the Black Country authorities of Sandwell, Dudley and Wolverhampton have recently undergone

consultation on their Regulation 18 Preferred Options Local Plan, each of which has identified a significant shortfall within their housing supply. Most notably, Sandwell with a shortfall of 18,606 are only in a position to identify a third of their housing land supply requirement, whilst Wolverhampton are only able to evidence half of their requirement with a shortfall of 11,998 homes.

- 4.7. This 'significant housing shortfall across the HMA' is acknowledged within South Staffordshire's Spatial Housing Strategy Topic Paper 2024 at paragraphs 4.5–4.9. At paragraph 4.9 it acknowledges that *'the adjacent authorities to South Staffordshire, Wolverhampton and Walsall are the two currently displaying the most significant unmet housing need which is less likely to be met through Black Country Green Belt options or further urban centres/employment land capacity uplifts'*. This suggests therefore that the only way in which to deliver this unmet need is through substantial Green Belt release.
- 4.8. The Spatial Housing Strategy Topic Paper (2024) continues to recognise the relationship between the District and adjoining GBBCMA authorities and the opportunity to deliver unmet housing needs along the north/north-western edge of the Black Country to minimise the extent to which households from these areas are displaced from existing communities, jobs and education. The Topic Paper at Paragraph 4.10 concluded that *'if unmet housing needs were located in close proximity to Wolverhampton and Walsall (i.e. along the north-western and northern edges of the Black Country) then this may minimise the extent to which households from these two areas are displaced from their existing communities, jobs and education'*.
- 4.9. The Green Belt Exceptional Circumstances Topic Paper 2024 (paragraphs 4.5 and 4.6) of the Local Plan evidence base continues to acknowledge the exceptional circumstances for the release of Green Belt land, providing the *'exceptional circumstances case for releasing Green Belt at the districts most sustainable settlements with the best sustainable transport links to these authorities in the conurbation that are the source of the unmet needs.'* However, in terms of delivering housing for the District and the GBBCMA this continues to focus on the delivery of housing on non-Green Belt options. Paragraph 7.2 of the Topic Paper sets out that only 0.16% of the District's Green Belt is proposed for release despite SSDC acknowledging the significant unmet need of the wider GBBCMA and these authorities being unable to accommodate any of SSDCs housing requirement given they are also constrained by Green Belt or urban areas with unmet needs.
- 4.10. It is unclear however why SSDC require the assistance of other authorities when there are other opportunities for sustainable housing development through additional and 'Green Belt' release whilst still ensuring a significant quantum of high value Green Belt land is protected across the District. It is also evident, that since writing to the GBBCMA authorities in 2021 (Appendix 1, Green Belt Topic Paper 2024), that the unmet housing shortfall across the HMA's as evidenced through the various HMA authorities' Local Plan Reviews is now significantly greater and SSDC need to take a greater proportion of the unmet need through additional housing allocations.
- 4.11. As well as continuing to focus on the delivery of homes through the development of non-green belt land, SSDC have placed an emphasis on higher density development. The Green Belt Exceptional Circumstances Paper 2024 sets out that *'under the preferred spatial strategy, land is released at an average density of 35dwellings per hectare, thereby ensuring Green Belt release is kept to a minimum'*. The Paper points to the density of 35dph recommended in the GBBCMA Strategic Growth Study 2018 to make efficient use

of land prior to the release of Green Belt land. As recognised by SSDC however, the study is dated, and pre dates mandatory government policy requirements, including increasingly stringent Building Regulations and 10% BNG. SSDC have also based the delivery of housing sites at a density of 35dph on historic development capacity in the District, including housing development sites which again did not have to deliver the requirements of more recent mandatory Government policy. This is discussed further later in this section.

- 4.12. SSDC clearly recognise the scale of the housing shortfall across the wider GBBCHMA however this is not reflected within the Plan itself. As demonstrated through the 2022 Publication Plan and under the provisions of the NPPF Paragraph 145, there are clear exceptional circumstances based on the housing evidence available at the time to suggest the release of additional Green Belt sites to meet both the District's and the wider HMA's housing need. Furthermore, since consultation on the Publication Plan 2022, the housing shortfall across the HMA has grown yet further, and yet the majority of the Metropolitan Authority who have produced a Local Plan during 2022-2024 have suggested that they cannot meet their own housing needs and the shortfall should be addressed via the duty to cooperate.
- 4.13. The SSDC's substantially reduced contribution of 640 homes towards the HMA unmet need is not reflective of the 'significant housing shortfall' clearly evident across the HMA authorities. It is clear therefore that the District, along with others in the HMA, need to go further to address this housing supply shortfall. South Staffordshire in particular has the ability to make a significant larger contribution to unmet needs in the HMA as it has a contiguous border with the West Midlands Conurbation. This could include a number of sites which could be highly sustainable, located on the edge of the conurbation.
- 4.14. The eastern edge of South Staffordshire's local authority boundary adjoins the local authority areas of Dudley and Wolverhampton with key transport infrastructure links running through South Staffordshire. The direct relationship between these adjoining urban authorities and the authority area of South Staffordshire provides further exceptional circumstances in which to release additional Green Belt land within the District to deliver the housing sites necessary to meet the clear unmet housing need across the wider HMA. Proximity to these urban conurbations also enables sites, particularly those located on or close to key transport infrastructure networks to benefit from sustainable transport including access to cross boundary bus and rail services consistent with the Plan's spatial strategy.
- 4.15. Paragraph 145 of the NPPF states that "*strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the Plan period.*" The 2024 Publication Plan is proposing some limited Green Belt amendments to provide proposed housing requirements. However, in order to address in particular, the issues arising from the shortfall in housing and employment land in the conurbations which in turn supports early review of the emerging Local Plan, it is essential that Green Belt boundaries are defined which will endure beyond the Plan period. The currently adopted Local Plan at Policy GB2 included safeguarded land for the longer term needs of the District. The Core Strategy was adopted in 2012 and so is now 12 years old. The NPPF highlights that Local Plans should be reviewed every 5 years so in effect the Core Strategy has endured two Local Plan cycles.
- 4.16. As a result, St Philips consider the 2024 Publication Plan should establish Green Belt boundaries which will not require amendment in the rest of the Local Plan cycle or indeed

beyond, through the introduction of safeguarded land. The introduction of safeguarded land would give the Council greater flexibility to accommodate development requirements and to assist in meeting a growing unmet housing need across the GBBCGMA. Following the removal of Policy DS6 (Longer Term Growth Aspirations for a new settlement) as proposed within the Publication Plan 2022, the introduction of safeguarded land is particularly important to future growth of the District.

- 4.17. Policy DS1 as currently drafted is unsound and does not meet with the provisions of the NPPF Paragraph 35. It has been demonstrated that there are clear exceptional circumstances for the release of Green Belt land to meet the unmet housing needs of the GBBCGMA. The delivery of 640 homes is not however considered to be a proportionate contribution towards meeting this need. In addition, there are additional Green Belt sites suitable and available for housing which are sustainably located and will contribute further to meeting this need as well as addressing other issues and challenges identified within the District. The Green Belt boundary should therefore be amended further to enable the release of additional Green Belt sites, such as that at Bratch Common Lane.

#### **Policy DS2 – Green Belt Compensatory Improvements**

- 4.18. Policy DS2 sets out the following hierarchy for Green Belt compensation:

*'Compensatory improvements to remaining Green Belt land adjacent to, or in close proximity to the development site;*

*Compensatory improvements to remaining Green Belt land within the wider locality accommodating the development;*

*Compensatory improvements to remaining Green Belt land in an area identified through the council's latest Nature Recovery Network mapping or Open Space Strategy.*

*In the event that it is robustly demonstrated that none of the above options can be satisfied (e.g., as land is demonstrably not available) then the council will accept a commuted sum that it will use to undertake compensatory improvements.'*

- 4.19. The hierarchical approach to the Green Belt compensation policy as drafted is not supported. Neither the NPPF nor the PPG refer to a hierarchy of preferred methods of Green Belt compensation.

- 4.20. To be found sound, the policy needs to be amended to delete reference to the hierarchy and instead state that Green Belt compensation is required in conjunction with development of sites removed from the Green Belt, as set out in the NPPF.

#### **Policy DS4 – Development Needs**

- 4.21. Policies DS4 sets out that SSDC will deliver a minimum of 4,726 dwellings across the Plan period up to 2041. This is a significant drop from the 9,089 dwellings identified in the previous 2022 Publication Plan.

- 4.22. This sees a reduction in the housing delivery to meet the District's own need from 5,330 to a *'minimum of 4,086 dwellings'*. This is in addition to a significant reduction in the 4,000 homes previously identified towards meeting the unmet needs of the HMA, with a contribution of only 640 homes now proposed towards this need.

- 4.23. Further to the Publication Plan 2022 the District's housing requirement has been revisited using the Standard Method. A reduction in the District's annual household growth baseline figure which is now 173 households (from 189 households in 2022), and an increase in the District's affordability ratio now 9.00 (down from 8.43 in 2022) has resulted in a reduction in the annual housing requirement across the Plan period from 241 dpa to 227 dpa.
- 4.24. Planning Practice Guidance is however clear that the figure produced by the Standard Method represents a minimum figure, rather than a requirement. This sits alongside the provisions of NPPF paragraph 67 which sets out that in terms any identified housing need figure *'the requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment'*. Having regard to the provisions of national policy, St Philips therefore raise concerns regarding the level of homes proposed with insufficient housing to meet both the District's and wider GBBCHMA housing and development growth needs across the Plan period.
- 4.25. In reviewing the baseline figure no account has been given to the District's relationship with the directly adjoining urban conurbation of Wolverhampton and the 35% standard method uplift figure applicable to the 20 largest cities in England, including Wolverhampton. In terms of housing need the SHMA 2024 update, paragraph 4.14 acknowledges that Wolverhampton's City boundary, as defined by the ONS, partly falls within SSDC's authority boundary. It does not however make any further adjustment to the baseline figure, stating that the overwhelming majority of the City's boundary falls within the Borough of Wolverhampton and therefore does not need to be accounted for with SSDC's housing requirement figure. Given SSDC have acknowledged the role of the District within not just the GBBCHMA but also the Functional Economic Market Area (FEMA), it would seem appropriate for SSDC to include a proportionate amount of this uplift within the District's housing requirement for the Plan period rather than simply to set it to one side. This is even more pertinent given the up to date evidence of these cross boundary authorities, highlighting the inability to accommodate housing need.
- 4.26. The updated SHMA (2022) projected the working age population in South Staffordshire to grow by 6,618 people between 2020 and 2040, however the SHMA update 2024 projects growth of only 1,012 people between 2023 and 2041. The apparent disparity between the two figures appears to be due to the 2022 growth projections having accounted for the GBBCHMA unmet housing need contribution, whilst the latest 2024 figure does not.
- 4.27. Whilst acknowledging that *'South Staffordshire is within a Functional Economic Market Area with the four Black Country authorities and so significant cross boundary flows are to be expected'* (SHMA 2024, paragraph 5.9), the Plan continues to ignore this relationship and the need therefore to contribute further to unmet housing needs of these authorities.
- 4.28. Instead, the SHMA (2024) at paragraph 5.10 sets out that *'The fact that additional housing does not have a good correlation with employment within the District means that providing further additional housing to try and achieve a balance with jobs would be inappropriate and would likely perpetuate the unsustainable current commuting patterns'*. The high commuting ratio along with the overwhelming housing shortfall across the GBBCHMA authority areas and in particular the urban conurbations directly adjoining South Staffordshire authority boundaries however emphasises further a requirement for the District to deliver a much higher contribution towards meeting the wider HMA's unmet housing need in excess of the standard method housing requirement figure.

- 4.29. In addition, the most recent 2024 South Staffordshire Strategic Housing Market Assessment update, as with the authorities' previous SHMAs, fails to consider the impact of committed development at the HS2 West Midlands Interchange ('WMI'), which is projected to create around 8,500 new jobs and up to 8,100 indirect jobs off-site, well in excess of the increase in the working age population between 2018 and 2038 identified by the HMA (6,618 people). In addition, the SHMAs do not consider the significant job growth provided through committed strategic employment developments planned at i54 and ROF Featherstone, despite the Economic Development Needs Assessment (EDNA) 2022 having identified the i54 development as a 'key employment corridor' and stating that the facility 'could lead to a profound effect on the local and sub-regional property market as demand for engineering/manufacturing space increases' (paragraph 4.22).
- 4.30. The EDNA update 2024 updates the earlier EDNA prepared by DLP Planning on behalf of SDDC to identify future employment needs across the South Staffordshire area for the period through to 2041. The EDNA update outlines that the approved WMI has the potential to generate some 1,560 jobs, however the previous EDNA (2022) set out that the WMI is projected to deliver 8,500 jobs on site together with up to 8,100 indirect jobs off site. St Philips would like to see further clarity in relation to these figures particularly as job growth is considered to be much higher.
- 4.31. With instability evident across the wider Birmingham and Black Country surrounding the delivery of unmet housing need and with no clear cross boundary redistribution agreements in place, the approach previously adopted under the 2022 Publication Plan in meeting this unmet HMA housing shortfall was actively supported and encouraged. Whilst it is acknowledged within the latest Publication Plan 2024 that the District should continue to contribute towards the housing needs of the wider HMA this is not considered an 'appropriate' level of contribution, particularly given also the District's role within the FEMA. The Plan should therefore go further in providing additional homes to address the significant and growing housing need across the wider GBBCHMA and in turn the opportunities this will create in addressing some of the key challenges the District faces in addressing its future economic health.
- 4.32. It is also essential therefore that the Plan provides flexibility above the minimum housing requirement to allow for a buffer to ensure sufficient homes will come forward to meet need. The Plan currently provides a buffer of 10% however despite the significant reduction in housing numbers across the Plan period: this has been reduced from the 13% buffer included within the 2022 Publication Plan. In view of the 2024 Publication Plan reducing housing supply from the 2022 version, rather than reducing the buffer, it ought to be increasing it as there will be less supply overall and therefore a greater impact if sites don't come forward.
- 4.33. Policy DS4 is not justified based on proportionate evidence nor positively prepared in line with national policy having regard to the District's own economic and infrastructure development needs, along with the shortfall in housing across the Greater Birmingham Housing Market Area and the District's role within the Functional Economic Market Area. The minimum housing requirement figure across the Plan period should be substantially greater than that currently proposed and more akin with the housing figure proposed under the previous 2022 Publication Plan.
- 4.34. Policy DS4 sets out that the delivery of new development will be monitored, and the housing needs of the District and GBBCHMA kept under review to inform whether a review

of the Local Plan is required. With the overwhelming housing shortfall, it is imperative that further work along with an early review of the Local Plan, in accordance with NPPF Paragraph 33, is undertaken as soon as possible to respond to the increasing development needs of both the District and the wider housing market area.

- 4.35. Paragraph 5.12 of the Plan sets out '*Proposals for updated evidence considering the housing market area shortfalls and potential growth locations are currently in discussion across the West Midlands Development Needs Group and South Staffordshire is committed to participating in updating the evidence base and considering its findings through future plan-making*'. Whilst the District appear committed to resolving the unmet housing need across the wider HMA, if the current Plan is to continue to contribute only 640 homes towards the wider HMA unmet housing need rather than the 4,000 homes previously identified, then there must be a clear commitment within the Plan to carry out an early review once the GBBCHMA authorities have undertaken a comprehensive update of the GBBCHMA Strategic Growth Study.
- 4.36. The extent of the unmet housing need evidenced within the GBBCHMA and in particular the main urban authorities of Wolverhampton and Dudley clearly requires the cooperation of adjoining authorities such as South Staffordshire to contribute a substantial, albeit appropriate, quantum of housing land if this need is to be met.

#### **Policy DS5 – The Spatial Strategy to 2041**

- 4.37. The previous 2022 Publication Plan proposed a much larger housing requirement to deliver both the District's and the wider HMA's housing needs across the Plan Period, with delivery of over 9,000 new homes in the Period up to 2040. The 2024 Publication Local Plan document however has significantly reduced the housing requirement to 4,726 homes, alongside a more 'insular' Spatial Strategy for the District, with housing numbers to be delivered across the Plan period based on a 'bottom up' approach to housing capacity to meet the District's own need and a limited contribution towards the unmet need of the GBBCHMA.
- 4.38. SDDC's preferred spatial strategy option, Option I, as identified in the Spatial Strategy Topic Paper 2024, focuses growth to sustainable non Green Belt locations, including safeguarded land and Open Countryside allocation sites, alongside additional limited Green Belt allocations made adjacent to Tier 1 settlements. The x2 strategic allocations at land north of Penkrigde and east of Billbrook include the delivery of 1,779 homes (minimum); with 1,374 homes allocated at Tier 1 settlements; 914 homes at Tier 2 settlements; 228 homes across Tier 3 settlements, 30 homes at Tier 4 settlements; 81 homes south of Stafford; and 194 homes at other rural locations/Tier 5 settlements.
- 4.39. Whilst support is given within the Plan to the delivery of housing allocations, including the release of land within the Green Belt, it is important that further recognition is given in Policy DS5 to a range of housing allocation sites in delivering balanced housing growth to meet the housing needs of not only the District but also the GBBCHMA in the short term housing needs and through the Plan period to 2041 and beyond. The opportunity for this additional housing development to deliver key strategic infrastructure and service improvements for the District, including road infrastructure, education and health facilities and quantitative and qualitative improvements to accessible open space and green infrastructure provision should also be emphasised. Inevitably with the delivery of less homes across the Plan period (under the provisions of Policy DS4), there will be less

opportunity to deliver a range of housing sites and meet a range of housing needs as part of balanced and reliable housing growth and the delivery of necessary infrastructure improvements across the Plan period.

- 4.40. Contributing a larger proportion of homes towards the unmet housing needs of the GBBCHMA would assist in addressing this balance, improving the affordability of homes (as acknowledged within the conclusions of the Spatial Housing Topic Paper, paragraph 4.10) and encouraging families and first time buyers to move into the District, and particularly within areas located along the eastern edge of the District with the adjoining West Midlands conurbations easily accessible via existing public transport, and in turn supporting existing services whilst also delivering enhanced infrastructure for the District via developer contributions.
- 4.41. Similarly to the Plan's strategic objectives and Policy DS4, the role the District plays in the wider GBBCHMA and FEMA must be emphasised further within the wording of Policy DS5. Spatial Strategy Option I currently fails to reflect the District's relationship with the adjoining West Midlands conurbations of Walsall and Wolverhampton, addressing the high employment commuting ratio from the District to these urban areas via key infrastructure links. In addition to housing at Tier 1 settlements and to the north of the District, the spatial strategy should therefore place greater emphasis on housing growth along the eastern edge of the District, as recommended through the GBBCHMA Strategic Growth Study.
- 4.42. The Housing Site Selection Topic Paper 2024 para 4.3 acknowledges that consideration of site constraints, including Green Belt, has limited the identification of sites for development. Similar to the adopted Core Strategy it has also been acknowledged within the Council's evidence base the ability for Tier 2 and 3 settlements to accommodate housing growth to deliver the spatial strategy for sustainable housing development well served by public transport. Whilst this may require the release of Green Belt land, carefully considered layouts have the ability to enhance landscape setting through appropriate compensatory measures alongside the protection of high and very high value Green Belt. This would include St Philips land interests at Bratch Common Road.
- 4.43. Although the importance of brownfield development is acknowledged as part of a balanced housing strategy for the district, it is important that over reliance on these sites does not result in an overprovision of flatted development unable to meet a range of needs (including families and older people), reduced affordable housing due to viability concerns, compromising the existing landscape character of village settlements, as well as limited outdoor amenity opportunities. Furthermore, the capacity of such sites to deliver new homes should have regard to the impact of 10% biodiversity net gain to be met on all sites, in particular given the high biodiversity value open mosaic habits commonly associated with brownfield sites will require greater need to offset biodiversity habitats which in turn will result in a lower net developable area and less capacity to deliver housing numbers.
- 4.44. Windfall development across the Plan period is comprised of 600 homes, contributing towards meeting the housing requirement of the District. Windfall development however does not allow for the level of or delivery of planned strategic infrastructure nor the range of market and affordable housing which the delivery of carefully planned housing allocations through the Plan will deliver. Furthermore, having confirmed that very limited previously developed sites are now available to accommodate housing development it is unclear what windfall sites will come forward to deliver housing, particularly given the SHELAA 2023 identifies a substantial number of the identified brownfield sites as neither



being suitable or available and those sites identified as being suitable previously allocated within the Site Allocations Document 2018.

- 4.45. Although historic windfall delivery rates have been taken into account the capacity of sites has been based on the ability of historic permissions across the District to achieve a capacity of 35dph. These developments were however based on less onerous policy provisions of the adopted Core Strategy, which did not require the delivery of 10% BNG, NDSS or M4(2)/M4(3) compliant homes for example, all of which have implications for the overall capacity of sites.
- 4.46. In addition, it would appear that windfall sites have been double counted, with the Indicative Growth Table for Option I on which the housing delivery figures for the Plan have been based including windfall allowance for the period 2026–2041, covering the period 26/27 and 27/28 within the Council’s 5 year housing land supply (SHELAA Report 2023). Alongside this, the delivery assumptions made by the Council again have been based on historic rates of delivery, with an estimated lead in time of 2 years for sites without permission for developments of 5–15 homes and 15–49 homes – this would seem optimistic given the substantial delays experienced in the planning system as a result of under resourced LPA’s and increasingly complex planning applications including more recently the need to assess 10% BNG for all sites.
- 4.47. The spatial strategy as currently proposed also fails to address affordability concerns within the District not only in terms of the open market and general housing supply but also in meeting the District’s affordable housing requirements. In terms of the delivery of affordable homes, the Affordable Housing and Housing Mix Topic Paper confirms at Paragraph 5.1 that 28.8% of the housing to be delivered up to 2042 should be affordable. Whilst Policy HC3 requires 30% affordable housing provision on all development (subject to viability), Paragraph 8.2 continues to set out that ‘affordable housing provision could be reduced to a figure slightly below 30% on brownfield sites, as well as strategic sites due to substantial infrastructure delivery and resulting impacts on viability’.
- 4.48. In summary, St Philips objects to Policy DS5 which is currently considered unsound as currently drafted. It is not justified based on proportionate evidence nor positively prepared in the context of addressing the shortfall in housing across the Greater Birmingham Housing Market Area and the Districts role within the Functional Economic Market Area.
- 4.49. It is considered that additional housing allocations capable of accommodating a range of housing needs in sustainable locations accessible to public transport should be delivered across the Plan period. This should include land which is suitably located to contribute towards meeting need in the GBBHMA, which would be located adjacent to the adjoining conurbations to make best use of the services available, public transport provision and to meet the need for housing close to its source. Without additional allocations the demographic imbalance and associated issues and challenges currently experienced across the District due to an ageing population and a decline of families and working age population will continue to threaten the economic stability of the District.

## 5. Site Allocations

### Policy SA3 – Housing Allocations

- 5.1. Wombourne is a Tier 2 settlement with access to employment and facilities as well as a frequent bus route providing connections to Wolverhampton and Merry Hill. It is considered Wombourne is a sustainable settlement within South Staffordshire District Council, capable of supporting housing growth to meet housing need and accessible to public transport in line with the Plan's spatial strategy. The merits of Wombourne are discussed further below, and it is considered it could accommodate further development, such as the land interests of St Philips at Bratch Common Road.
- 5.2. The recognition that Wombourne has sustainable qualities is long standing as evidenced in the current previous Local Plan. Core Strategy Policy 1 of the South Staffordshire Core Strategy (December 2012) categorised Wombourne as one of nine 'Main Service Villages' within the current settlement hierarchy.
- 5.3. It is recognised that Wombourne benefits from an excellent level of essential community services and access to a wide range of public transport and supporting infrastructure. Wombourne also benefits from the following community facilities:
- Wombourne Civic Centre
  - Wombourne Village Hall
  - Dentist
  - Wombourne Library and Community Centre
  - Wombourne Leisure Centre (fitness gym, toning suite, studio cycling and swimming)
  - Medical Practice
  - Play-tropolis (children's role-play centre)
  - Public House, bars and cafes
  - Several churches
  - Wombourne High School
  - 5 Primary Schools
  - Nursery
  - Numerous shops and services
- 5.4. Policy DS5 seeks to direct growth to the most accessible and sustainable locations within the District, and Wombourne is identified as a Tier 2 settlement, although this is a demotion from its current ranking within the adopted settlement hierarchy. It is a suitable location for



additional growth, and St Philips land interests could provide a location for such growth, or for safeguarded land for future growth.

- 5.5. The Site would be able to deliver development in the first five to ten years of the Plan period, it is suitable, available and achievable.
- 5.6. The Site has been identified as having a low-moderate landscape sensitivity to development and it is well related to the existing settlement. It is within 800m of a secondary school and approximately 900m of two primary schools. Distances to other facilities are shown on the Local Movement and Facilities plan on page 13 of the Vision Document for the Site at Appendix 2.
- 5.7. There is an opportunity to widen Bratch Common Road to provide suitable highways access as well as facilitate pedestrian movement including a footway on Bratch Common Road, to the benefit of the whole community. Access to local amenities can also be enhanced including improvements to the Public Rights of Way Network and pedestrian/cycle infrastructure to facilitate movement by modes of transport other than the private car.
- 5.8. The Council's Sustainability Appraisal (SA) identified that the Site would have a major negative impact on climate change adaptation as it is in part in an area at high risk of surface water flooding. However, technical work undertaken indicates that the existing surface water flows can be accommodated on the Site, and ground reprofiling would mitigate surface water flooding concerns and ensure that the drainage design for any proposed development would provide a betterment in terms of surface water management.
- 5.9. There are no existing uses that would require relocation and no issues of contamination that would require remediation. The impacts of the development of the Site can be mitigated and enhancements to sustainable access methods, biodiversity and open space (as examples) can be achieved.
- 5.10. It is considered that Wombourne is an appropriate location for the release of land for additional development and development of the Bratch Common Road site would accord with the three dimensions of sustainable development identified within the NPPF. It would also be a suitable site for release from the Green Belt for safeguarding so that it can come forward beyond the current Plan period without the Council needing to amend Green Belt boundaries further.



## 6. Conclusion

- 6.1. This representation is made by Pegasus Group on behalf of St Philips to the South Staffordshire Local Plan Publication Plan (Regulation 19) consultation. The representation relates to their promotion for residential development of land at Bratch Common Road, Wombourne.
- 6.2. St Philips is supportive of the Local Plan review undertaking but has made specific comments on key matters associated with the Local Plan Review. These include on the amount of land identified for housing, Green Belt land release and safeguarded land and on site specific matters associated with the Council's consideration and evidence base for the land at Bratch Common Road.
- 6.3. With the overwhelming housing shortfall, it is imperative that further work is undertaken with the GBBCHMA authorities as a matter of priority to agree a clear position in relation to the housing shortfall across the wider HMA along with the distribution of housing numbers. If the Plan proceeds as drafted an early review, in accordance with NPPF para 33, would be required to be undertaken at the earliest opportunity to respond to the increasing need for development both within South Staffordshire and the wider housing market area.
- 6.4. The information contained within these representations, read in conjunction with the appended Vision Document, demonstrates that the land at Bratch Common Road is a suitable deliverable site for residential development, subject to release from the Green Belt.
- 6.5. St Philips considers that their land interests at Bratch common Road are suitable, available, achievable and deliverable and would deliver development to help meet the identified housing needs within the Plan period, complying with all other policy requirements.
- 6.6. St Philips would wish to be represented at any Hearing session covering the policies against which objection is raised.



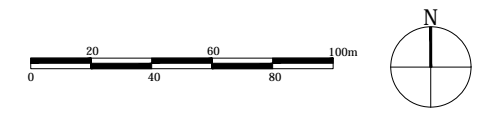
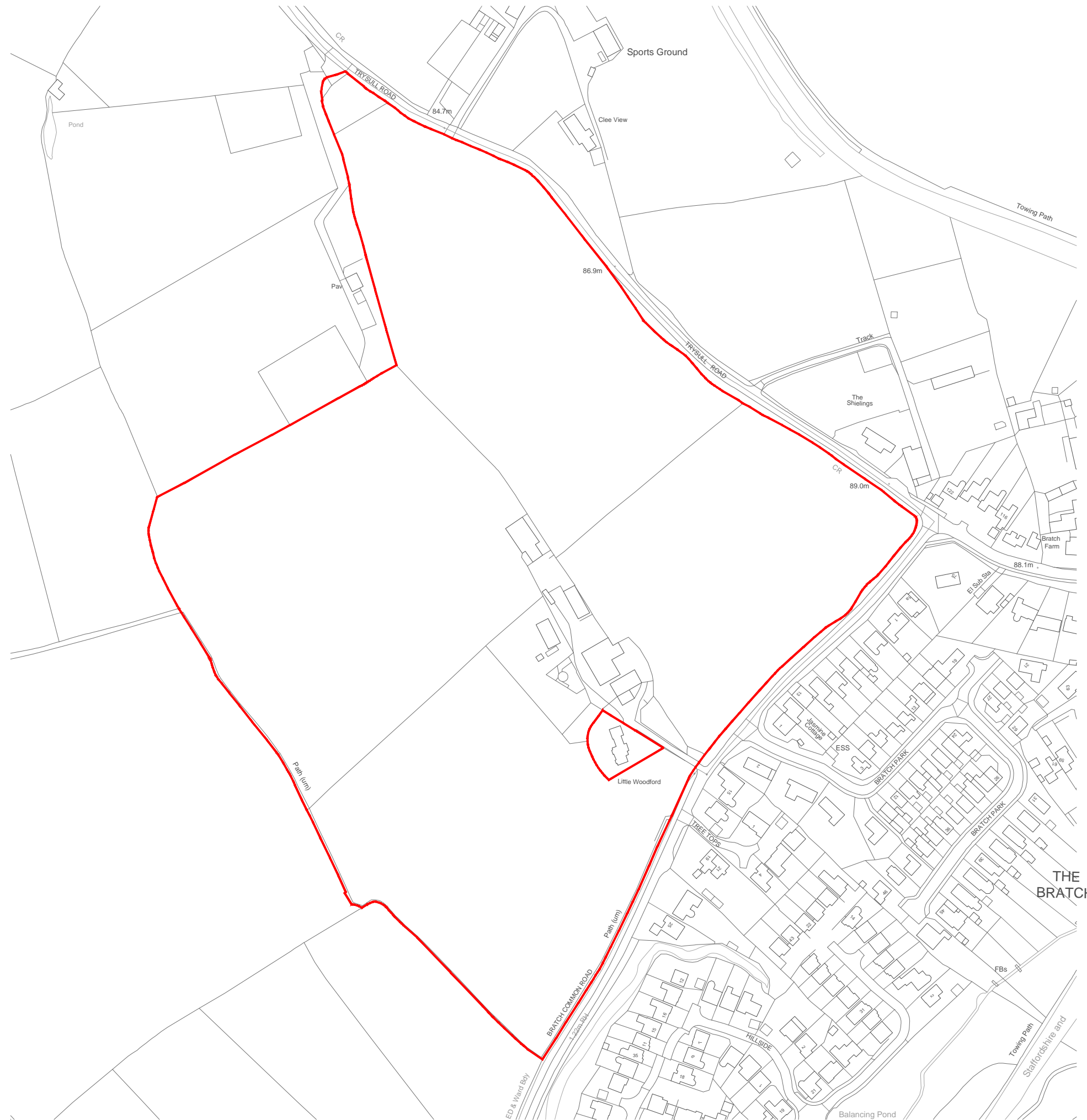
## APPENDIX 1 – Site Location Plan

The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
A Little Woodford removed from site boundary	03.08.18	EMB	CDB

### LEGEND

 Site Boundary  
 12.71 Ha



Project  
**Bratch Common Road**  
**Wombourne**

Drawing Title  
**Site Boundary Plan**

Date	Scale	Drawn by	Check by
20.07.18	1:2500 @ A3	KU	EB
Project No	Drawing No	Revision	
29042	9000	A	



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## APPENDIX 2 – Vision Document

VISION DOCUMENT

BRATCH COMMON ROAD

# WOMBOURNE

DECEMBER '18





## ST PHILIPS

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Date 03.12.2018 Status Draft Rev D

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# VISION

The site at Bratch Common Road offers the unique potential to successfully integrate with the surrounding countryside and village of Wombourne. The design will sensitively respect the local characteristics of Wombourne to ensure creation of an attractive, high quality and locally distinctive place to live. The health and well-being of residents is central to the design, with active and sustainable lifestyles encouraged through the provision of walking and cycle routes, play facilities and other welcoming open spaces.





# 1. INTRODUCTION

## 1.1. Document Scope

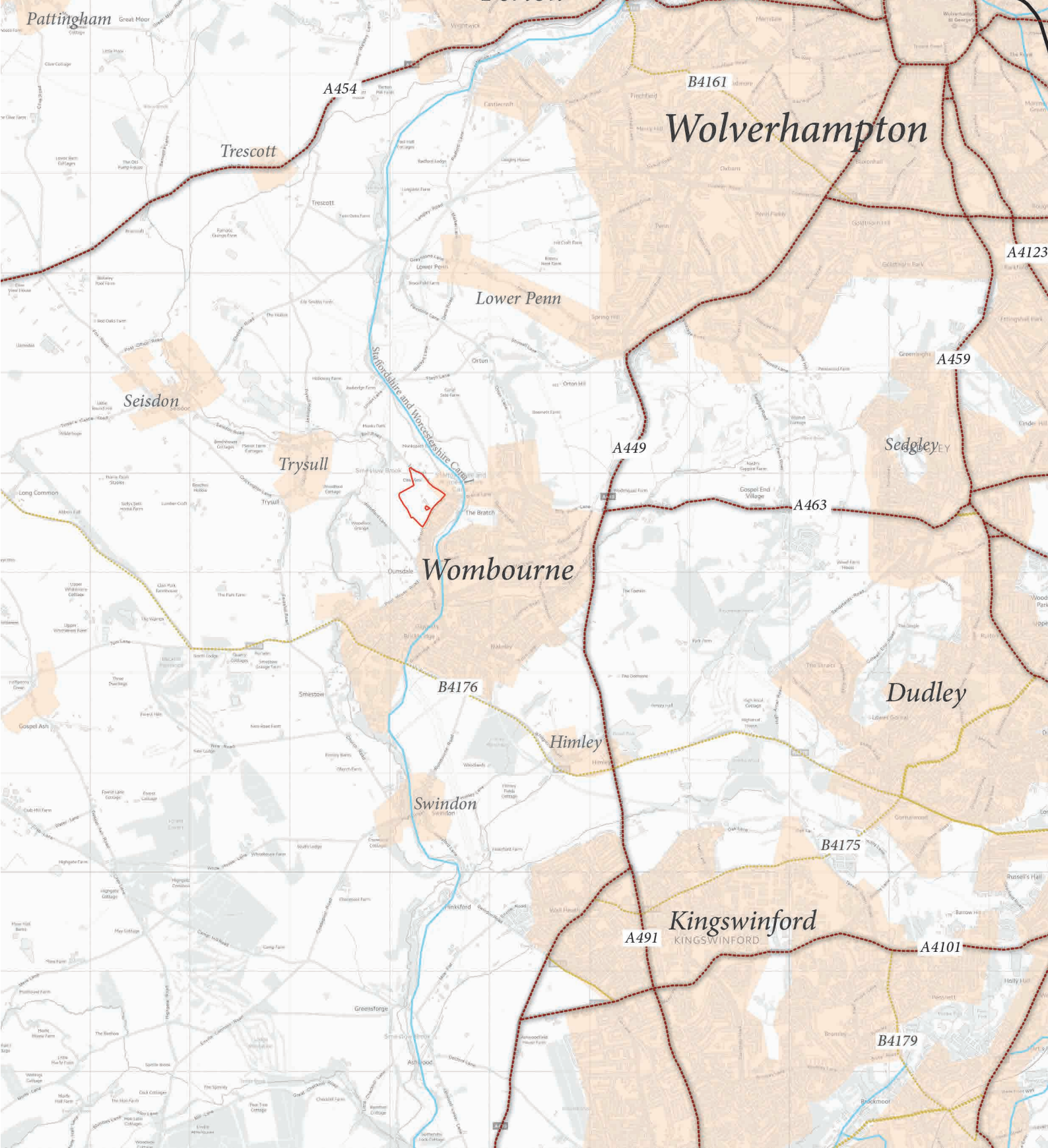
This Vision Document has been prepared on behalf of St Philips Ltd to support promotion of the site for residential development at Bratch Common Road, Wombourne through the South Staffordshire Local Plan review process.

The key aims and objectives of the document are:

- to review the site in the context of current planning policy;
- to present an initial understanding of the site within the local context;
- to provide a summary of current site assessments undertaken to date; and
- to present an emerging concept masterplan, accompanied by an explanation of the key design principles that have informed it.

## 1.2. Site Location

The site is situated on the north-western edge of the village of Wombourne. It lies around 7km south-west of Wolverhampton and 8km west of Dudley.



Pattingham

B4161  
**Wolverhampton**

Trescott

Lower Penn

Seisdon

Trysull

Staffordshire and Worcestershire Canal

A449

Sedgley

Wombourne

A463

Dudley

B4176

Himley

Swindon

B4175

A491  
**Kingswinford**  
KINGSWINFORD

A4101

B4179

### 1.3. Site Description

The site, shown opposite, is situated south of Trysull Road and bounded by open countryside to the west and south and Bratch Common Road forming an attractive, tree lined boundary to the east.

The site is comprised of two agricultural fields of varying scales, with field boundaries defined by hedgerows and tree lines and a number of old farm buildings which are due to be demolished. Ground levels vary throughout the site. The south and east of the site is generally flat, seeing a gradual decrease in height towards the northern edge, the north-western edges in particular. A public right of way runs along the southern and eastern edge connecting to the wider countryside.

The aerial photo shows how the site is well related to the existing settlement edge of Wombourne.



*Site Photo - Bratch Common Road*

Trysall Road

Bratch Lane

Staffordshire and  
Worcestershire Canal

Bratch Common Lane

Wombourne





### 1.4. Planning Policy

The site is situated within the administrative area of South Staffordshire District Council (“the Council”) and currently lies within the designated Green Belt.

The statutory development plan for the District is comprised of the Core Strategy (adopted in 2012) and the Site Allocations Document (SAD) (adopted in 2018). The Council has recently embarked on its Local Plan Review; consultation on the Issues and Options version is being undertaken during October and November 2018, with progression to Preferred Options anticipated in Spring 2019.

#### *Local Plan Review*

The Local Plan Review is proposed to cover the period to 2037, replacing the extant development plan upon its adoption. It will allocate sites in order to meet the District’s development requirements for the plan period; the housing requirement will be finalised upon the publication of the new Standard Method for calculating local housing need (expected from the Government by 24 January 2019), and will also need to take account of unmet cross-boundary need.

The proportion of unmet need arising from the Greater Birmingham Housing Market Area (HMA) to be accommodated within the District is yet to be determined through the duty to co-operate process. Whilst the level of need will be subject to recalculation using the Government’s revised standard methodology, the Greater Birmingham Housing Market Area Strategic Growth Study (published in 2018), identifies a shortfall 60,855 for period between 2011 and 2036.

The Government’s consultation into the revised NPPF saw the publication in September 2017 of Local Housing Need (LHN) figures for all local authority areas using the Standard Method. For South Staffordshire, this equated to a per annum requirement of 245 dwellings for the period between 2016 and 2026. However, following the publication of the 2016 Household Projections in September 2018, the Government has announced its intention to review the Standard Method amid concerns (confirmed by Housing Minister Kit Malthouse) that the local housing need calculations must take account of ‘pent-up demand’.

For the plan-making purposes, the Government has advised local planning authorities to calculate local housing need using the 2014 household projections as a demographic baseline. Accordingly, as part of its response to the Council’s Issues and Options consultation (which should be read in conjunction with this Vision Document), GVA, on behalf of St Philips, have recalculated the District’s objectively assessed need for the plan period. This suggests a requirement for 5,529 dwellings to meet District-specific need between 2018 and 2037.

Whilst the Issues and Options version of the Local Plan Review acknowledges the issue of cross-boundary need, its preferred strategy – ‘Option C’ – to accommodate 4,000 dwellings from the HMA shortfall, is not underpinned by an evidence-based approach. In response to this issue, GVA have analysed the District’s relationship with the Greater Birmingham HMA and devised an appropriate methodology upon which unmet need can be apportioned. This is informed by travel-to-work patterns and out-migration flows to the District, using ONS data.

Whilst set out in detail within St Philips' representations, the analysis concludes that 6,209 additional dwellings would be required within the District to provide a proportionate approach to accommodating unmet need arising from those areas of the HMA to which the District has a demonstrable and tangible relationship. This would equate to a total requirement of 11,738 dwellings for the plan period – above the level identified under the Council's preferred Option C, but significantly less than Options D and E, thus representing a realistic prospect of delivery at 618 dwellings per annum.

As confirmed through its response to the Local Plan Review Issues and Options consultation document St Philips is supportive of a strategy which combines Options 'A' and 'C' in respect of the spatial distribution of growth. This would focus residential development principally around the higher tier (Tier 1 and 2) settlements, and sustainable sites on the edge of Wolverhampton, in line with the recommendations of the HMA Strategic Growth Study.

This would align with paragraph 72 of the NPPF, which is supportive of accommodating development within significant extensions to existing towns and villages where a large number of homes are required over the plan period.

### *Evidence Base*

The Council's updating of its Strategic Housing and Employment Land Availability Assessment (SHELAA) to inform the Local Plan Review will, by virtue of this Call for Sites evidence gathering exercise, provide a renewed opportunity to consider the suitability of land at Bratch Common Road, Wombourne.

The majority of the site forms land which has previously been identified as having potential for residential development, most recently through the 2018 SHELAA (Ref. 554). Table 6 of the SHELAA assigned an 'amber' rating to the site, on the basis that it was not currently available due to its Green Belt designation. No other environmental or technical constraints were cited. This position is corroborated by the evidence subsequently set out in this Vision Document.

The joint commissioning of the Black Country and South Staffordshire Green Belt Review is welcomed and is necessary in the context of addressing unmet cross-boundary housing needs. Whilst the publication of the review is not expected until Spring 2019, it is important that a sufficiently fine-grained approach to the assessment of Green Belt parcels is adopted. Parcels must be of an appropriate size to ensure that conclusions as to their overall performance can be applied in their entirety.

### 1.5. Assessment Against The Five Purposes of The Green Belt

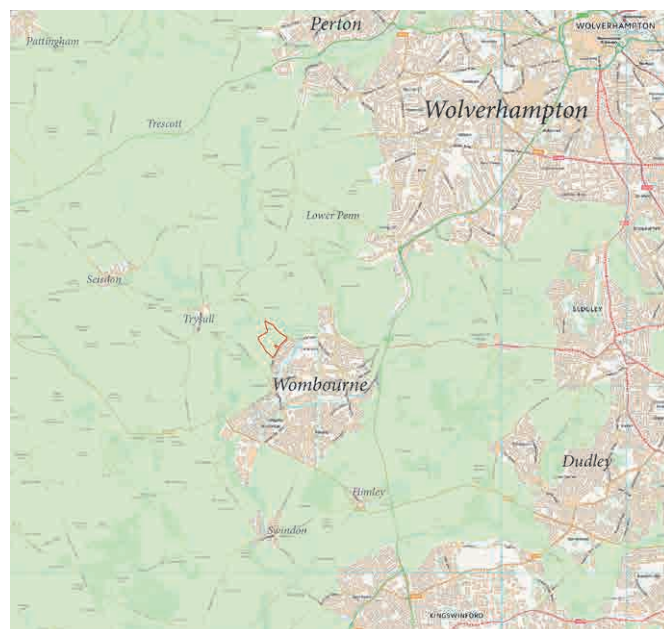
To date, the Council's most recent evidence to inform the areas of Green Belt designation within the Borough is the South Staffordshire Partial Green Belt Review 2016. This considers the performance of Green Belt parcels around the defined settlements in the District, but stops short of assessing the contribution made by that which adjoins the Black Country urban area.

In the context of Wombourne, the partial review assesses 7 parcels which adjoin the settlement boundary; number 6(D) includes the site at Bratch Common Road and forms a large, elongated parcel adjoining the western boundary of the village. In accordance with the assessment methodology, the parcel's performance was scored against the five purposes of the Green Belt, set out in paragraph 134 of the NPPF.

In terms of performance against the indicator set out under paragraph 134(a) the NPPF – to check the unrestricted sprawl of large built-up areas – parcel 6 was assigned a low score due to its location, which does not prevent the spread of development from Wolverhampton. Whilst the ability of the parcel to prevent ribbon development along Trysull Road was reflected in a higher score specifically for this purpose, it is demonstrated within this Vision Document that sufficient landscape buffers can be maintained either side of this road, including along the Worcestershire and Staffordshire canal corridor.

In the considering the indicator set out under paragraph 134(b) of the NPPF – to prevent neighbouring towns merging into one another – the focus of the review centres upon the relationship of the parcel to the small village of Trysull (situated to the west).

Whilst the assessment notes that the wooded floodplain of Smestow Brook serves to prevent the merging of Wombourne and Trysull, landscape enhancements which could be delivered as part of an allocation for residential development on the site at Bratch Common Road, would bolster the physical barrier between the settlements, thus retaining the function of the Green Belt for this purpose.



*Local Green Belt Extent*

In the context of NPPF paragraph 134(c), it is noted that parcel 6 has been assigned a high score for the purpose of assisting in the safeguarding of the countryside from encroachment. Whilst the parcel generally promotes openness and offers views towards the wider open countryside, the urbanising influence of Wombourne should be acknowledged and reflected in the scoring of the forthcoming joint Green Belt review.

The partial release of land within the northern part of parcel 6, which would facilitate residential development at Bratch Common Road, would see the majority of the parcel remain undeveloped and continuing to serve its purpose in safeguarding the countryside. Moreover, the creation of a wooded landscape buffer around the western boundary of the development would, in the longer-term, reduce the visible urbanising influence of Wombourne when taking in views from Trysull.

The landscape enhancements envisaged and detailed within this Vision Document would similarly reduce the impact of Green Belt release within parcel 6 on the setting and historic character of Trysull (a designated Conservation Area). This should be considered in the planning balance when determining how land within Parcel 6 would continue to fulfil this purpose in accordance with paragraph 134(d) of the NPPF.

The partial Green Belt review concedes that Parcel 6 does not make a significant contribution towards achieving the purpose set out under NPPF paragraph 134(e) – to assist in urban regeneration by encouraging the recycling of derelict and other urban land. This is due to the notable absence of previously developed land within the District's villages, which is capable of accommodating new housing.

As acknowledged within the Local Plan Review Issues and Options consultation, and corroborated through GVA's independent analysis, the District will need to consider Green Belt release in order to meet its own objectively assessed housing need, as well as a proportion of unmet cross-boundary need arising from the Greater Birmingham HMA.

By taking a sensitive approach to masterplanning, that incorporates significant landscape enhancement measures to offset the impacts of development and protect the wider Green Belt, there will be a demonstrable and compelling case to justify that exceptional circumstances exist for the release of land at Bratch Common Road to help meet the District's housing needs.

Notwithstanding the site's current Green Belt designation within the extant development plan, the Council's wider evidence base for plan-making purposes confirms that there are no significant environmental or technical constraints which would preclude an allocation for residential development. This is further borne out by the analysis which is set out in this Vision Document.

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## 2. LOCAL CONTEXT

### 2.1. Access, Movement & Facilities

The site is located approximately 2.5km to the north-west of Wombourne village centre, and is bound by Bratch Common Road (to the east) and Trysull Road (to the north).

The A491 runs approximately 2.2km to the east of the site in a north south alignment. The A491 routes between Wolverhampton and Stourbridge, whereby the wider strategic road network can be accessed, ensuring that destinations including Wolverhampton, Telford, Kidderminster and Birmingham are within easy reach.

The site is well located to key local services and amenities in Wombourne. Key local amenities including Ounsdale High School, Westfield Community Primary School, Dale Medical Centre, a newsagent and several bus stops are located within 1.4km of the site. Additionally, within Wombourne, there are recreational areas including the Wombourne Cricket, Tennis and Bowling Club, and Wombourne Library and Community Centre, alongside other facilities such as dentists, pharmacies and petrol stations, all of which are considered to be within an acceptable walking distance from the site.



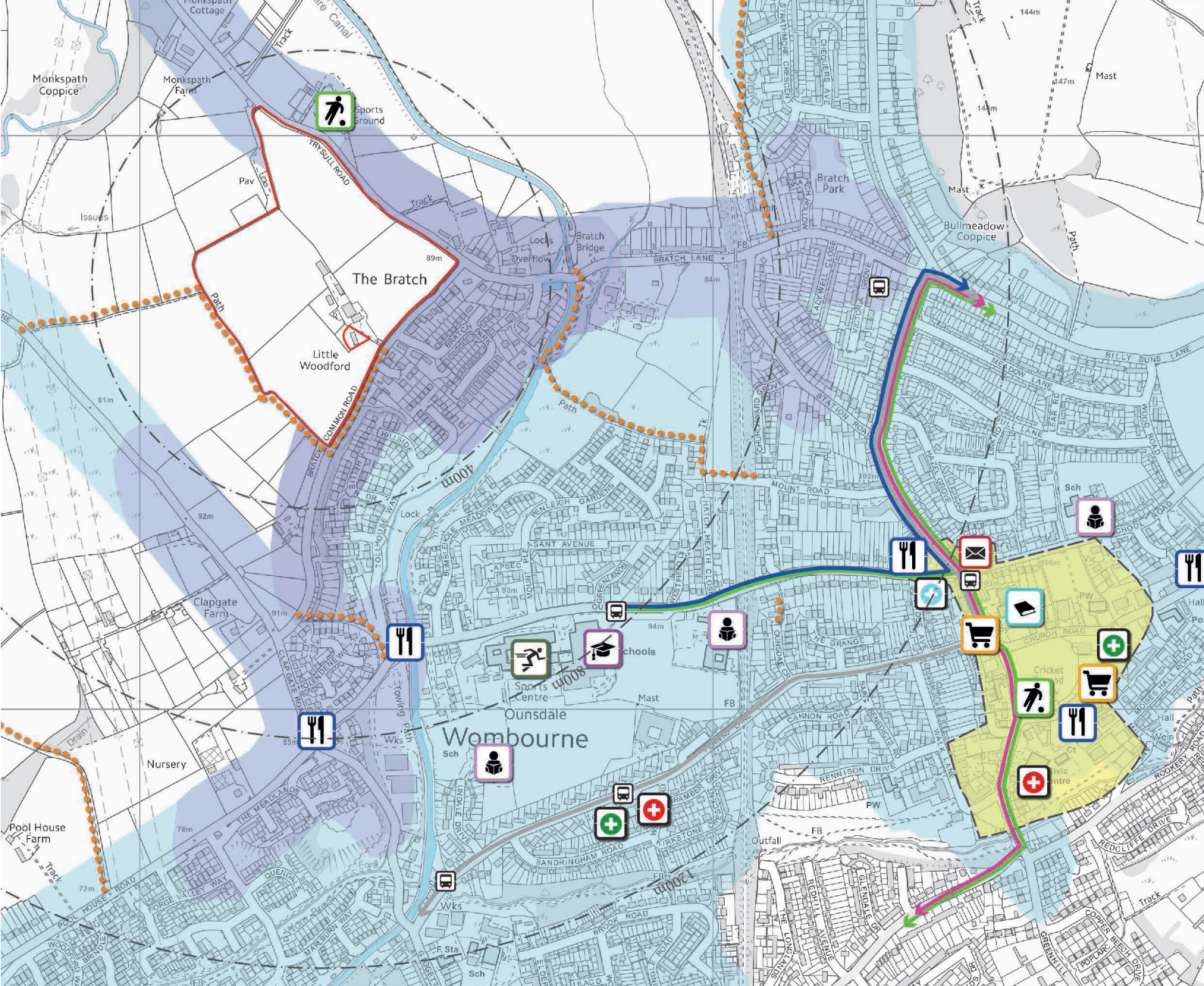
*Local bus service connecting to village centre.*





*Local Co-operative*



*View south over village green / cricket pitch.*



- |   |                     |   |                   |   |               |  |   |
|---|---------------------|---|-------------------|---|---------------|--|---|
|  | Site location       |  | Primary School    |  | Post Office   |  | Bus Stop  |
|  | Isochrone           |  | Secondary School  |  | Health Centre |  | Service 15 - Wolverhampton - Merry Hill via Kingswinford  |
|  | Local Centre        |  | Leisure Centre    |  | Pharmacy      |  | Service 16 - Wolverhampton - Stourbridge via Kingswinford |
|  | 0 - 6 Minute Walk   |  | Sport Facilities  |  | Dentist       |  | Service 16s - Wolverhampton - Stourbridge                 |
|  | 6 - 12 Minute Walk  |  | Convenience Store |  | Library       |  | Service 25s - Ounsdale Secondary School - Blakenhall      |
|  | 12 - 24 Minute Walk |  | Cafe/Restaurant   |   |               |  |   |

## 2.2. Landscape Character

### *National Landscape Character: NCA: 66 Mid Severn Sandstone Plateau*

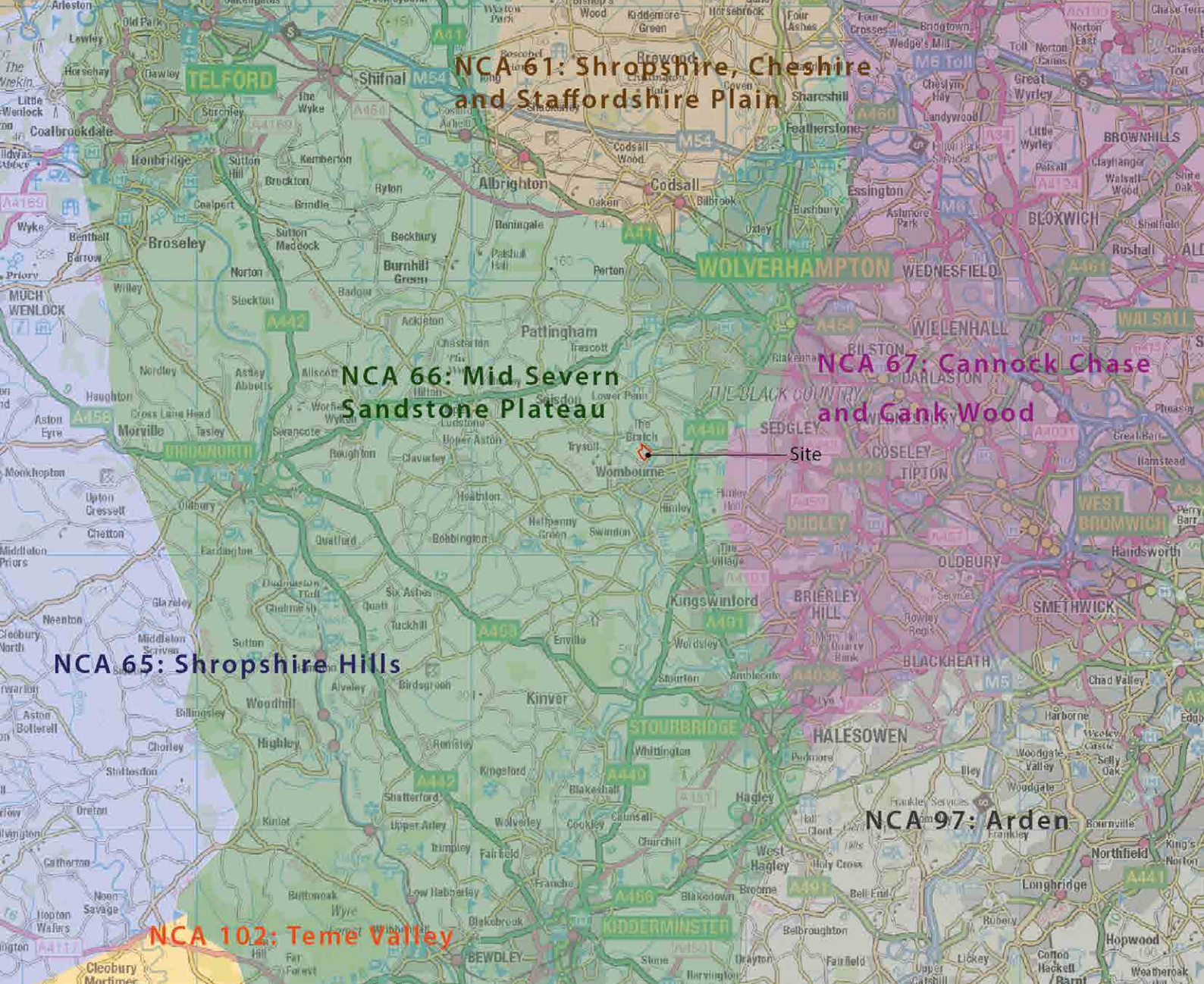
Landscape Character Assessment at a national level of study is recorded by Natural England (NE) within 159 National Character Areas (NCA). The Landscape and Visual Appraisal (LVA) contained within the Vision Document (VD) records a careful appraisal of the national level character study in relation to the site and the emerging development proposal.

The site and its immediate surroundings lie within the National Character Area profile: NCA 66 Mid Severn Sandstone Plateau. NCA 66 is a large area extending to more than 88,000ha. The site and its setting exhibit some of the key characteristics of NCA 66 that include:

- Extensive sandstone plateau in the core and east of the NCA underpins an undulating landscape with tree-lined ridges.
- The plateau is drained by the rivers Worfe and Stour and fast-flowing streams such as Smestow Brook in small wooded, steep-sided streamside dells, locally known as dingles.
- Mixed arable and pasture land with smaller, irregular shaped fields bounded by hedgerows with hedgerow oaks.

- Traditional buildings constructed of brick vary in colour. The local Kidderminster and Bromsgrove Sandstone features extensively. Its characteristic red colouration provides local distinctiveness to many towns and villages and estate boundary walls.
- Important man-made heritage features include the Staffordshire and Worcestershire Canal, the M54 and the railway line that links the River Severn with the Trent and Mersey Canal.
- The NCA is predominantly rural and the extensive sandstone plateau extends across the central and eastern area where it meets with the urban areas of Birmingham and the Black Country.





National Character Area Plan



Site Boundary

Natural England National Character Areas (NCA):



NCA 66: Mid Severn Sandstone Plateau



NCA 65: Shropshire Hills



NCA 102: Teme Valley



NCA 97: Arden



NCA 61: Shropshire, Cheshire and Staffordshire Plain



NCA 67: Cannock Chase and Cank Wood



### 2.3. Regional Landscape Character

Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan 1996-2011

Staffordshire County Council's SPG: 'Planning for Landscape Change' is now over 20 years old. It provided guidance on the landscape and visual character of the county. Although the report is now out of date, the description and evaluation of the county presented within is still accurate and therefore has been in used to inform the landscape character within this VD.

The SPG describes the landscape character of Staffordshire in 22 different Landscape Character Types (LCTs). The site and its setting fall within LCT - 'Sandstone hill and heath'. The LCT is characterised by pasture and grazing farmland patterned by irregular but largely intact, small-scale fields. The landform is undulating and in places, is deeply cut by stream valleys. The views across this gentle landform range from short to medium length. Where long range views are not obstructed by trees or settlements, the distant horizon is made by the high ground of Orton Hill, over 1 km to the north-east.

Major communication routes run from south to north through the county including the M6, the A449 and the Staffordshire and Worcestershire Canal.

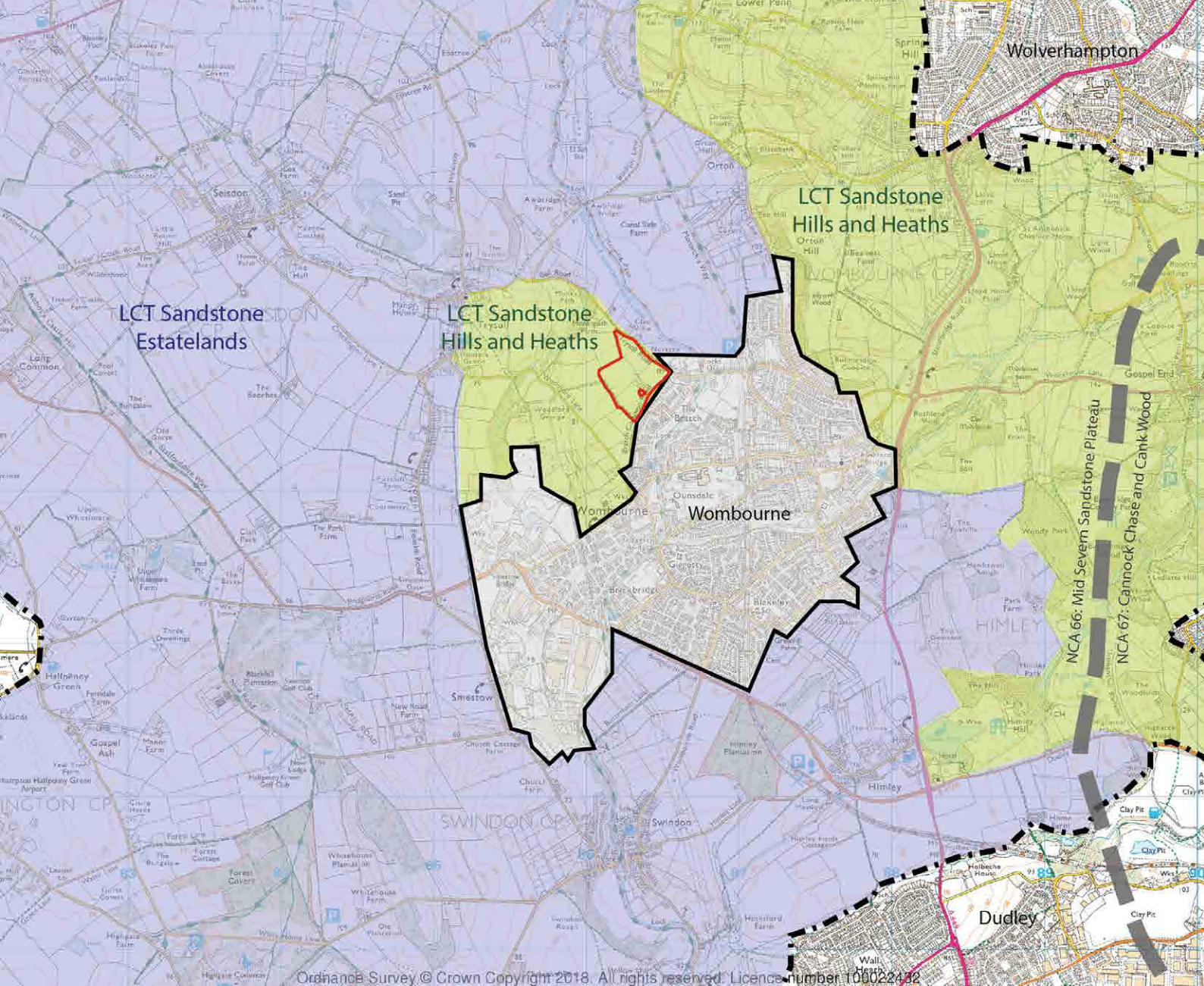
### 2.4. Local Landscape Character

The site adjoins the western boundary of the built-up area of Wombourne which lies within the administrative boundaries of South Staffordshire Council (SSC). The Supplementary Planning Documents SSC contain a Historic Environment Character Assessment (HECA) and a Landscape Sensitivity Study (LSS) for housing. The Council does not have a Landscape Character Assessment (LCA). In the absence of such LCA the local landscape character is informed by the HECA and LSS.







#### *Historic Environment Character Assessment: South Staffordshire (2011)*

The HECA by Staffordshire County Council for SSC recognizes 13 'Project Areas' within the district for the assessment. The HECA aims to establish the potential for the historic environment of these project areas to absorb new development and housing in particular. The site falls within the 'Swindon and Wombourne' (SW) Project Area. All project areas are subsequently divided into 'Historic Environment Character Zones' (HECZs). The site is located within the central part of SWHECZ 2 - West of Orton Hill and The Bratch.

SWEHCZ 2 has 5 Historic Character Types (HCTs) present within the area. The site is situated within HCT: 'Piecemeal Enclosure'. The open fields were often enclosed incrementally as 'Piecemeal Enclosure' during the post medieval period. 'Piecemeal Enclosure' is typified by reverse 'S' and sinuous field boundaries some of which appear to be discernible within the field pattern.



### Local Landscape Character

- |   |  |   |  |
|---|--|---|--|
|  | Site Boundary                            |  | Staffordshire County Council LCT: Sandstone Hills and Heaths |
|  | County Boundary                          |  | Staffordshire County Council LCT Sandstone Estatelands       |
|  | Natural England: National Character Area |   |  |
|  | Settlement                               |   |  |

The 'Piecemeal Enclosure' at The Bratch had probably originated as one of the open fields belonging to Wombourne known as 'Pottelith' field in the 13th century. This field, known later as Putley Field, was apparently still open in the early 18th century, so this field system was probably created later in the 21st century.

The HECA further recommends that any proposed development should seek to complement the low settlement density and the conservation of the fabric and legibility of the historic landscape character. Development should also be designed to enhance the local distinctiveness and respect the local vernacular in terms of its scale and architectural form.

#### *Landscape Sensitivity Study (2017 Update)*

The LSS focuses on the growth at the 'Main Service Villages', Wombourne being one of them. The Wombourne focus area is split into Land Cover Parcels (LCPs). The site lies within the LCP WM13 which extends up to the Staffordshire and Worcestershire Canal in the north-east, Wombourne built area to the south-east, public footpath 'Trysull and Seisden 13' to the south-west, Woodford Lane to the west and Smestow Brook corridor to the north-west.

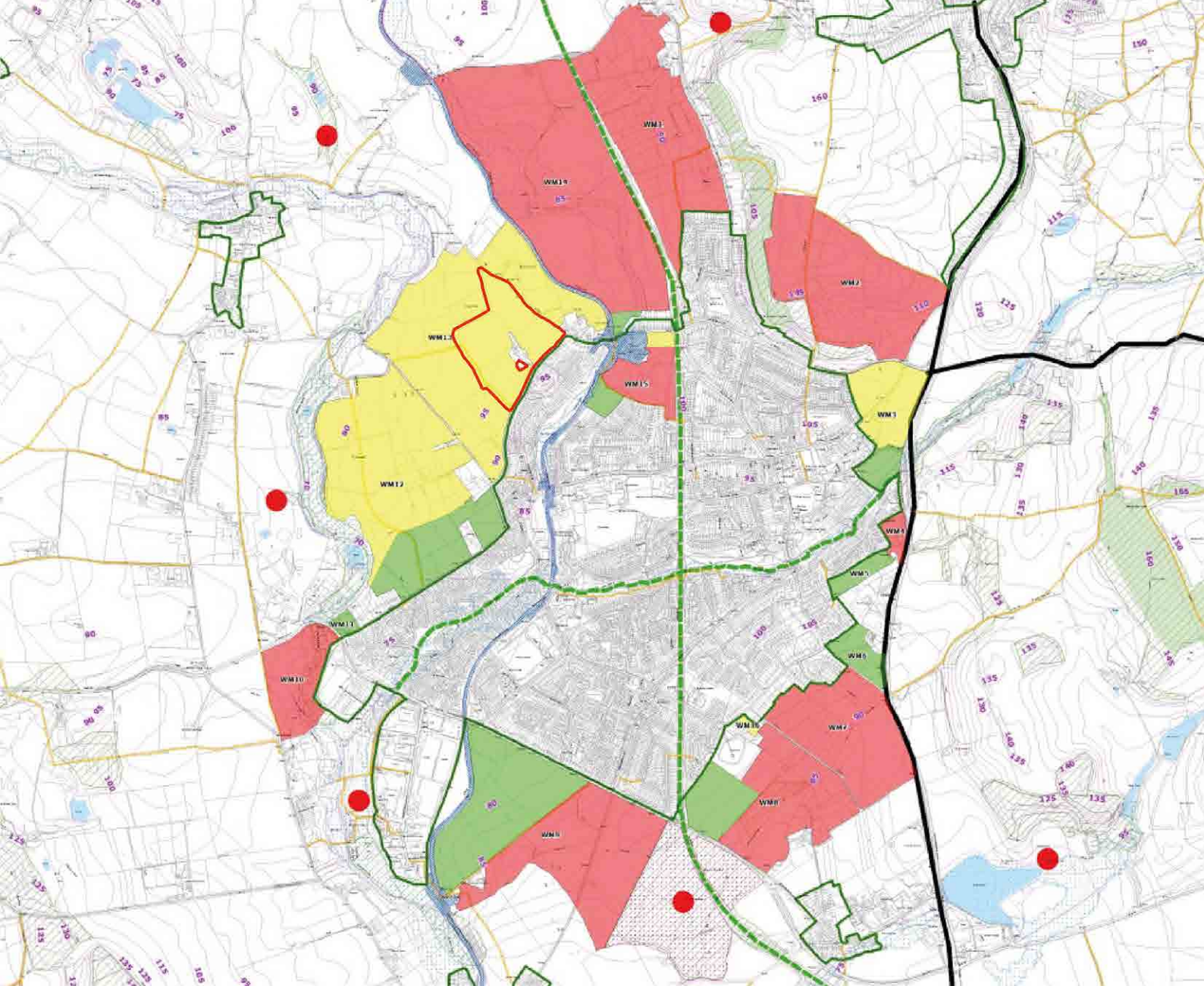
WM13 is a large LCP comprising medium to large fields with boundaries delineated by hedgerows. The land falls gently to the Smestow and forms the shallow valley side. The LCP is bordered on its south eastern and south western edges by quiet lanes. The north eastern part of the LCP is bisected by Trysull Road.

Key characteristics, as recorded within the LSS, pertaining to the site and its surrounding include:

- A varied rolling/undulating topography
- Streams in shallow valleys
- A well-defined irregular field pattern
- Arable and pastoral farming
- Network of narrow lanes, often with hedge banks
- Large numbers of hedgerow oak and ash
- Small, irregular patches of ancient woodland
- Clustered settlement pattern of scattered farmsteads and roadside dwellings
- Traditional red brick farmsteads and dwellings with clay tile roofs

The LSS notes that the LCP has retained some structure but there has been some hedgerow loss resulting in field consolidation. There are urban influences present from the settlement edge along Bratch Common Road but the area generally retains a rural feel.

WM13 has been assessed to be a landscape of medium sensitivity. The LSS states that the LCP has some potential to accommodate housing development in some situations without significant character change or adverse effects.



Landscape Sensitivity Plan

Site Boundary

Landscape Sensitivity Rating:

High

Medium

Low

## 2.5. Land Use and Settlement Pattern

The nearest major settlement to the site is Wolverhampton (population: 210,319; 2011 census). Wolverhampton's centre lying approximately 7km from the site's north-eastern boundary. Wolverhampton is not visible from the site. However, the site's south-eastern boundary adjoins the village of Wombourne which is considered to be a 'Main Service Village' within South Staffordshire. Wombourne being in such close proximity, is visible from the site.

It is predominantly a pastoral landscape, outside the urban areas. The Staffordshire and Worcestershire Canal along with Monarch's Way provides recreational use to the wider area.

The settlement pattern in the area reflects the transport corridors. Smaller built up areas are generally ribbon development concentrated around junctions of roads and larger built up area being situated off the A449, generally to the west of the A road. The site is well related to the settlement to the south and south-west.

## 2.6. Tree Cover

Tree cover within the immediate setting comprises areas of woodland dotted throughout the landscape with wide woodland belts being a common feature in particular along the Smestow Brook. Linear tree belts are also found along Monarch's Way - a long distance path along the disused railway line.

NCA 61 records that interlocking blocks of mixed woodland and old orchards provide a well-wooded landscape and conifer plantations combine with parklands to give an estate character generally to the east of Wombourne.

The field pattern in the landscape is defined by the trees within the hedgerow field boundaries. Overall, the fields are generally devoid of individual trees. Tree cover on the site is limited to hedgerow trees in the field boundaries. Close to the site, trees are common along the watercourses and within the back gardens of the residential areas of Wombourne.

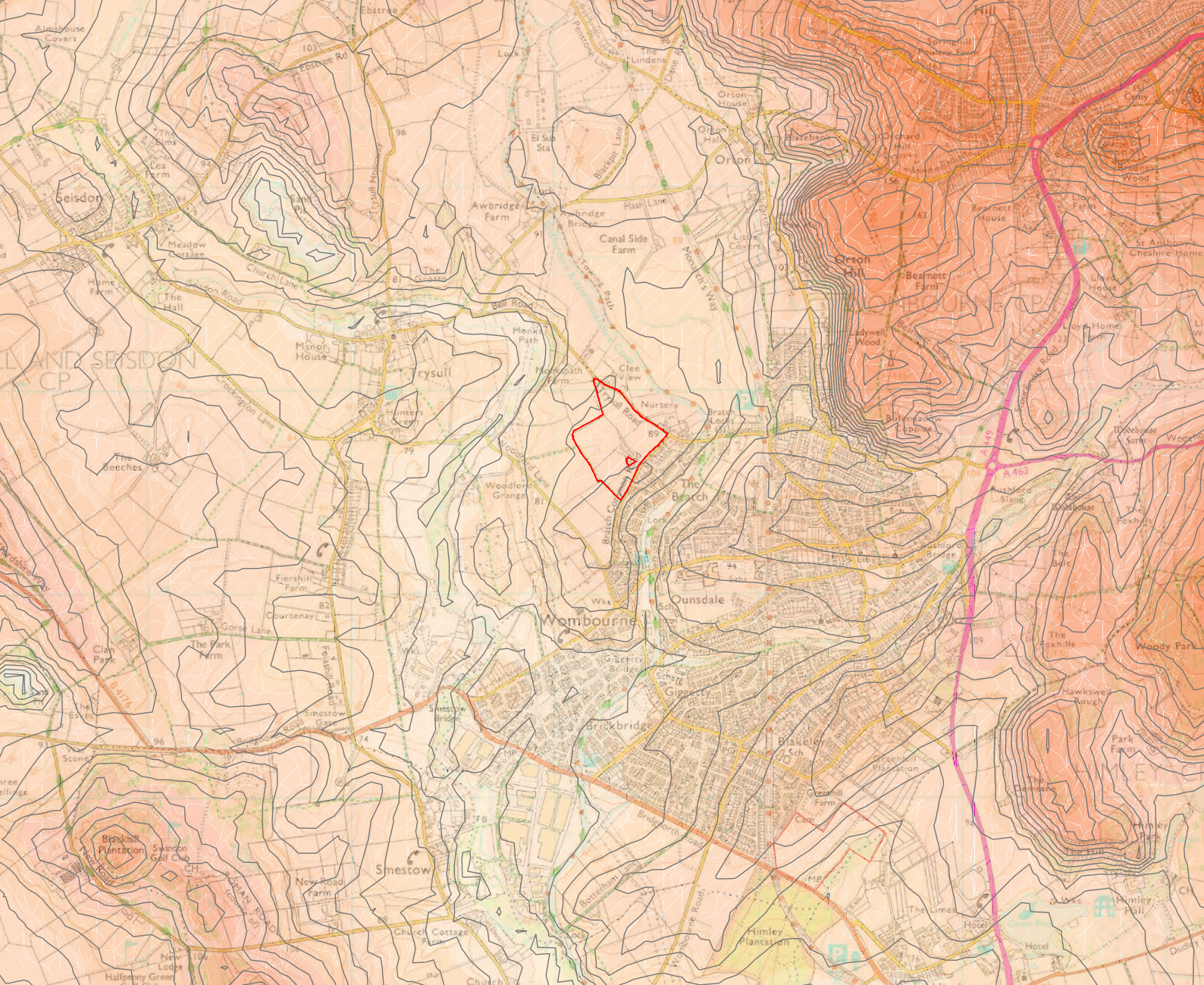
The HECA recommends the re-establishment of the historic hedgerows along their original alignments.

The Staffordshire Planning for Landscape Change states that “field corner planting would generally be an appropriate scale of new woodland”. The report further notes that “screening of incongruous urbanising landscape features could be achieved by well-designed and sympathetically placed woodland blocks. The visual influence of urban edges can be reduced by directing views with new woodland planting.”

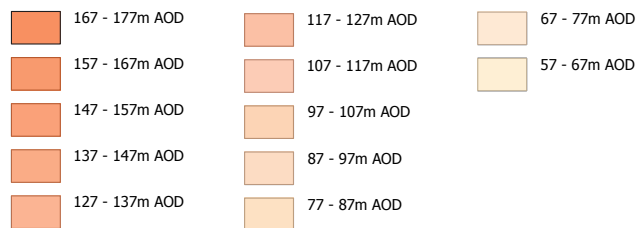
## 2.7. Landform

Landform is a key component of landscape character as it influences many aspects of how landscape appears and has been used over time. The site has a gently undulating landform ranging from 84m AOD to the north-east to 92m AOD to the south-west.

The wider setting of the site comprises a rolling landform with Smestow Brook forming the low-lying areas and rising up to the north-east and east. Public Right of Way (PRoW) 'Wombourne 16' is located on Orton Hill, one of the higher areas (163 AOD), located approximately 1.5km to the north-east of the site.



*Landform of the Setting*





## 2.8. Heritage & Archaeology

A Preliminary Archaeological and a Heritage study has been undertaken in relation to the site and surrounding area, which provides an indication as to the extent, survival and importance of archaeological, historic landscape and built heritage assets that could potentially be affected by development

Consultation with Historic England baseline data confirms that there are no designated heritage assets located within the boundary of the site.

Within the wider 1km search area there are the following designated heritage assets:

- One Grade II\* listed building.
- 9 Grade II listed buildings.
- 2 Conservation Areas.

In respect to potential indirect impacts of future redevelopment of the site on heritage assets, proposals may result in change within the setting of the following designated heritage assets which may in turn result in an impact to their significance:

- Grade II\* The Bratch Water Pumping Station (NHLE Ref: 1232411);
- Staffordshire and Worcestershire Canal Conservation Area; and
- Grade II Staffordshire and Worcestershire Canal Bratch Locks, Bridge number 47 (Bratch Bridge), Bridge number 48 (Upper Bratch Bridge) and associated Tollhouse (NHLE Ref: 1232421).

Whilst setting is a contributing factor to the significance of each asset, important setting elements in respect to The Bratch Water Pumping Station and Bratch Bridge, Upper Bratch Bridge, Bratch Locks and the former tollhouse are predominantly restricted to their immediate canal-side setting which is defined by the Conservation Area boundary. It is anticipated that there would be no change to their settings and subsequently no harm to their significance.

With regards to Staffordshire and Worcestershire Canal Conservation Area, it is anticipated that impacts of 'substantial harm' are extremely unlikely; potential impacts being limited and of less than substantial harm at worst.

In respect of potential indirect impacts to The Bratch Water Pumping Station and Bratch Lock and its bridges and tollhouse, which could be experienced as a consequence of changes within their settings such as the development of the site, it is anticipated there would be no change to their settings and subsequently no harm to their significance.

### *Opportunities*

- The inclusion of a standoff to the north east corner of the site would maintain current views out of the Conservation Area towards the site.
- The conservation of existing hedgerow boundaries and trees around the site perimeter should retain the traditional means of enclosure around the site, helping to conserve its wider semi-rural character and cushion the impact of any new development in views southwards from the canal towpath, as the canal extends northwards.



*Bratch Locks*

## 3. SITE ASSESSMENT

*The following sections within this chapter summarise the site's technical constraints and opportunities, illustrated by the plan opposite.*

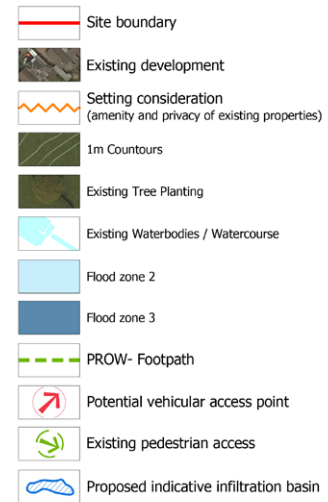
### 3.1. Access & Highways

Bratch Lane currently narrows to a single track as it passes over the canal bridge. The development strategy includes the provision of a shuttle signal scheme over this section of Bratch Lane, which would improve highway safety, facilitate pedestrian movement could unlock future development within the wider Wombourne area.

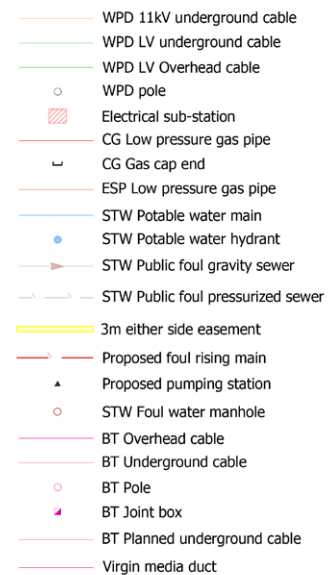
There is an opportunity to widen Bratch Common Road, which is currently of poor quality and of insufficient width in places, either within the development site frontage, or in conjunction with potential adjacent developments.

Whilst there is currently a limited pedestrian footway on Bratch Common Road, the development strategy would provide a facility on the site side of the road. This would connect to the existing network and could be undertaken in conjunction with potential adjacent developments to provide a continuous pedestrian facility along the entirety of Bratch Common Road.

The severance between the site and Wombourne village centre/ local amenities can be overcome via improvements to the local Public Rights of Way (PROW) network and via the proposed pedestrian/cycle infrastructure, which facilitate movement between the site local amenities.



#### UTILITIES





### 3.2. Drainage & Flood Risk

A desk study of the flood risk and drainage aspects of the proposed development site has been undertaken. The site is wholly located in Flood Zone 1 and is at low risk of flooding from all other sources.

Smestow Brook is located 300m to the north west of the site and the Staffordshire and Worcestershire Canal is located approximately 130m to the west. Neither watercourses, are a risk of flooding to the site.

Due to the site levels, a pumping station and a foul rising main will need to be constructed to serve the site which proposes connecting into the existing public foul network on Bratch Common Road.

Development proposals will seek to accommodate the existing surface water flow paths and mitigate surface water flooding by ground re-profiling where necessary, whilst ensuring flood risk is not increased elsewhere.

Appropriate use of SUDs techniques, including suitable attenuation measures to restrict surface water runoff to greenfield rates, will ensure that the drainage design for the proposed development provides betterment in terms of surface water management.

### 3.3. Geo-Environmental

The site has remained largely unchanged since the initial 1882 mapping, with the exception of the development of a farmhouse and associated agricultural properties in the centre of the site in 1984. The remainder of the site is shown to comprise agricultural land.

No significant potential environmental or contaminative issues have been identified from the past and present use of the land adjacent to the site.

The site is underlain by superficial deposits of Till mapped in the north of the site, with glaciofluvial deposits recorded in the south. The Wildmoor Sandstone Member is recorded to underlie the entire site area. There is a potential for made ground to be present in areas where structures exist on site. The site is underlain by a principal aquifer and there is a Source Protection Zone (SPZ) for major abstraction 250m to the east of the site.

It is considered based on the information reviewed, the current and historical use of the site does not represent a significant risk to the environment and is suitable for the proposed end use of residential development with associated infrastructure. If any issues relating to potential contamination are identified on site, appropriate measures will be undertaken to reduce any risk posed to development.

### 3.4. Arboriculture

A desk study of the arboriculture of the proposed development has been conducted.

There are individual trees located on the site boundary and a few individual trees located on the field boundaries within the site.

Careful masterplanning and considerations to the site design will be undertaken during the planning of the development proposals, to ensure that impact on these trees is minimised.

Retained trees will be provided with adequate protection during construction work.

Where possible, the masterplan will provide areas for planting for the replacement of any trees that may be lost as a result of the development.

Following a review of the South Staffordshire Council tree preservation order (TPO) records, there are TPOs on trees within the site. Further consultation with South Staffordshire Council would be required to understand which trees have a TPO.

### 3.5. Ecology

An ecological assessment has been undertaken, involving a site visit and desk study. The desk study involved analysis of ecological records provided by Staffordshire Ecological Records Centre for 2km from the site boundary, and examination of satellite and OS maps.

The site comprises grazed improved grassland of low intrinsic ecological value with peripheral and intersecting hedgerows containing mature trees. There is a cluster of several farm buildings within the centre of the Site. There are two Local Nature Reserves, eleven non-statutory designated sites and three ancient woodlands within 2km of the Site; none are considered likely to be adversely impacted by the development due to their distance from the Site.

Hedgerows are a priority habitat and careful masterplanning and considerations to the Site design will be undertaken during the planning of the development proposals, to ensure that potential impacts on hedgerows are minimised. There are habitats within the site that could be suitable to support protected species including badger, bats and birds. Preliminary assessments of the buildings and trees within the site identified two trees and one building that have the potential to support roosting bats.

Further ecological surveys will be undertaken to inform necessary mitigation measures for protected species, which would then be incorporated into the development. The proposed development offers opportunities to retain and enhance local biodiversity.

### 3.6. Utilities

An incumbent utilities search has been conducted to identify existing recorded services within the site boundary and the immediate vicinity. These searches have provided the following results.

#### *Electricity*

Records show that there is an overhead low voltage cable located within Trysull Road that crosses into the site boundary in the north of the site. The cable follows the site boundary and crosses out of the site further to the south. The cables travel overhead and underground along Bratch Common Road. There are overhead and underground cables that cross into the site boundary in the south-east which feed the existing farm buildings and residential property which is not included within the site. There are electricity apparatus located within the vicinity of the site which could potentially provide a connection to the proposed development. Further consultation with the electricity provider is required at the detailed design stage to determine the point of connection.

#### *Gas*

Records show that there are low pressure gas mains located within Bratch Common Road. There are no gas mains located within the site boundary. There are gas mains located within the vicinity of the site which could potentially provide a connection to the proposed development. Further consultation with the gas provider is required at the detailed design stage to determine point of connection.

#### *Potable water*

Records show that there are potable water mains located along Bratch Common Road and Trysull Road. There are no potable water pipes that cross into the site boundary. The potable water pipes within the vicinity of the site would potentially be able to provide a connection to the proposed development. Further consultation with the potable water provider is required at the detailed design stage to determine point of connection.

#### *Telecoms*

There are BT cables located along Bratch Common Road and Trysull Road. There are overhead cables that cross into the site and run parallel to Bratch Common Road before crossing out of the site in the south-east. There are Virgin Media apparatus located along Bratch Common Road. Virgin Media apparatus is located within the site boundary which supply Little Woodford farm. There are other BT and Virgin Media apparatus located within the vicinity of the site that could potentially provide a connection to the proposed development.

### 3.7. Soils & ALC

A desk-based review of Agricultural Land Classification (ALC) has been undertaken.

The site area is approximately 13 ha comprising four agricultural fields and existing farm buildings.

ALC is a standardised method for classifying the quality of agricultural land based upon the type and level of agricultural production it can potentially support. Land is placed into five Grades with Grade 1 being ranked as Excellent and Grade 5 ranked as Very Poor. Best and Most Versatile (BMV) land comprises land of Grades 1, 2 and Subgrade 3a, and is afforded a degree of protection in planning policy.

The Provisional mapping identifies the land within the site as Grade 2, immediately bordered by units of Grade 3 and Urban areas. Therefore, from the Provisional ALC it should be assumed that the land within the site is of BMV quality.

The Provisional mapping also shows agricultural land quality in the Shropshire and South Staffordshire area to be characterised by areas of Grade 2 (Very Good) and Grade 3 (Good to Moderate) agricultural land and Urban areas.

The potential loss of BMV land should be considered against the site being a logical extension to the existing residential development in the area, capable of utilising the local amenities, services and infrastructure; which is preferable to the development of isolated areas of agricultural land elsewhere. In line with the NPPF, the site also incorporates the re-development of the existing farm and hardstanding (brownfield land), partially directing development away from agricultural land.

Although the land within the site would no longer be in agricultural production, the area of unsealed land (assumed to be 50 % of the area removed for residential dwellings combined with the open space areas and residential gardens) has the potential to support the development through sustaining regulatory (i.e. carbon sequestration and flood attenuation), supporting (i.e. habitat creation) and cultural services (i.e. recreational value). This would be promoted by the maintenance of soil quality through the implementation of industry good practice soil management measures during the construction period.



### 3.8. Noise Assessment

A desk-study review of potential noise aspects associated with the proposed development site has been undertaken and has generated the following considerations.

The main source of noise is expected to come from Trysull Road which is adjacent to the north-eastern boundary of the site and had a 60-mph speed limit.

Another potential noise source is Bratch Common Road which borders the south eastern boundary of the site and has a 40-mph speed limit.

Both of these roads are single carriageway and are unlikely to carry high volumes of traffic, therefore the noise impact from local road is considered not to be a significant source of noise to the development.

In order to achieve guideline levels of noise, it may be necessary that proposed dwelling will be orientated with gardens in the screened side or garden fencing is used to screen the external living noise.

To ensure that there are no significant noise impacts on the proposed development, careful masterplanning will be undertaken, which will include consideration of the orientation of houses and designing garden fencing to screen any potential noise.

### 3.9. Air Quality

A qualitative air quality screening assessment has been undertaken for the proposed development site.

There are a number of AQMAs within the South Staffordshire District Council (SSDC) administrative area, however, these are not close to the proposed development site. The closest AQMAs are within neighbouring City of Wolverhampton Council (CWC) and Dudley Metropolitan Borough Council (DMBC), approximately 2.5km northeast and 3.7km southeast respectively.

The background levels of NO<sub>2</sub> and PM<sub>10</sub> are well below the background air pollutant concentration objectives according to the DEFRA Local Air Quality Management (LAQM) web pages.

It is recommended that a detailed air quality assessment is undertaken to determine any potential impacts the proposed development may have on existing and proposed sensitive receptor locations, associated with development-generated traffic and impacts associated with construction dust.

Any impacts identified would be assessed to determine the most appropriate mitigation measures, to ensure there are no adverse impacts to air quality as a result of the proposed development.



### 3.10. Landscape Appraisal

The site is of an irregular shape; however, the site boundaries are well defined:

- Trysull Road to the north and north-east.
- Bratch Common Road to the south and south-east.
- Private lane off Trysull Road and associated field boundary to the north and north-west.
- Public footpath 'Trysull and Seisden 13' to the south-west.

Within these defined boundaries, the site includes all built form present bar the south-western most property and its associated garden boundary demarcated by a hedgerow and a line of purple beech trees.

The site adjoins the built-up area of The Bratch to the south and south-east, which is an area of Wombourne lying to the west of Staffordshire and Worcestershire Canal. The countryside lies to the north, north-east and the west, although interrupted by ribbon developments along the many roads that criss- cross the landscape.






The site follows the field pattern, generally made up of medium to large sized fields and therefore the site is of an irregular shape. The site apart from the built form, all of which lie along the private lane off Bratch Common Road, comprises four pastoral fields. The central boundary between the fields and the outer boundaries consist of dense well managed hedgerow with occasional hedgerow trees particularly oaks. The remained of the internal field boundaries are post and wire fencing.

The landform of the site is gently undulating with a noticeable dip within the north-eastern corner of the site. Tree cover on site is limited to hedgerow trees with the fields remaining open, which is characteristic of the area. The hedgerow along Trysull Road and Bratch Common Road and on site are well-managed and trimmed low.

Public Right of Way (PRoW) Trysull and Seisden 13 runs along the site's south-western boundary. The ProW starts further west from Woodford Lane and end at Bratch Common Road. There are no other PRoWs on site.



### Landscape Appraisal Plan

-  Site Boundary
-  Settlement
-  Public Right of Way
-  Green Belt
-  Canal





#### Baseline: Landform

-  Contours
-  Slope




#### Baseline: Vegetation on Site

-  Tree Cover and field trees
-  Hedgerow

#### Landscape Edge Characteristics

-  North-east: Trysull Road
-  South-east: Bratch Common Road
-  North-west: Private lane off Trysull Road
-  South-west: Public footpath

#### Local Visual Analysis

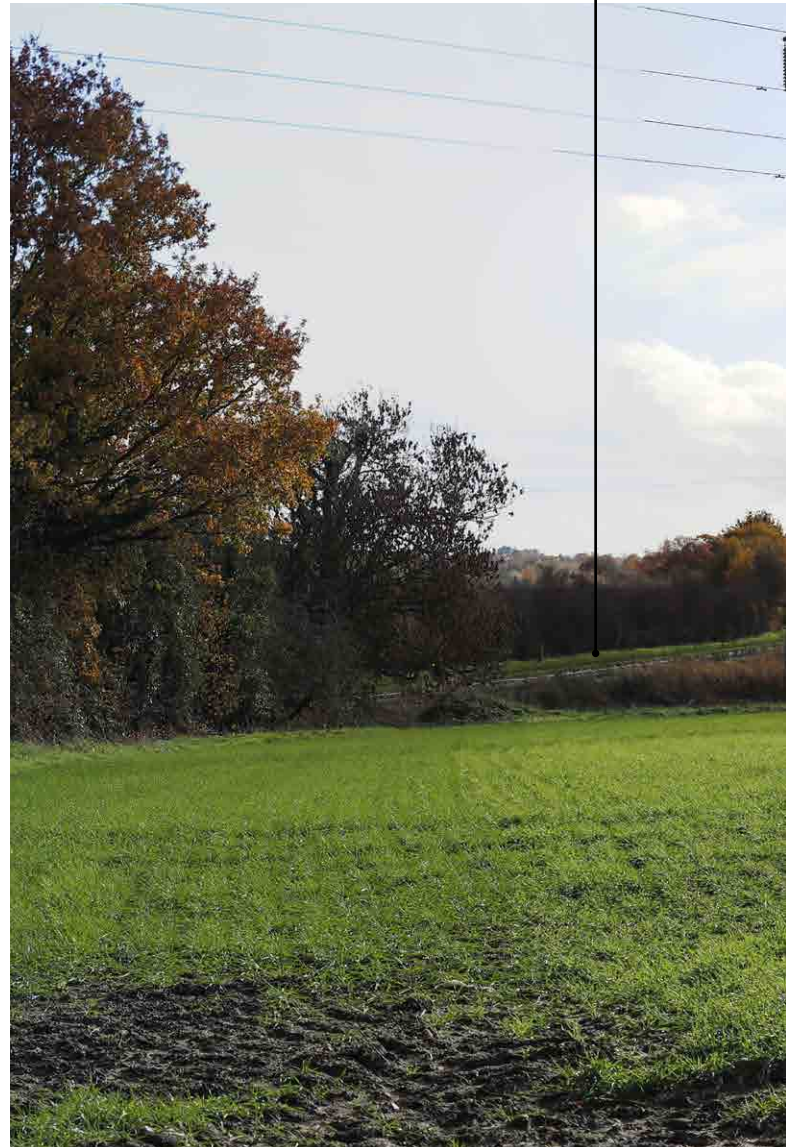
-  Clear/open Viewline
-  Filtered/Partial Viewline
-  Truncated Viewline

### 3.II. Views and Visual Amenity

The site is gently undulating, providing expansive views from the south-west on higher ground looking across the site and beyond to the countryside. The views tend to showcase extensive tree cover with well treed ridges being a common feature as characteristic of NCA 66.

Views of the settlement edge at Bratch Common Road are seen from the PRoW 13 being in close proximity to the site. Views from further west along the same PRoW are heavily filtered by intervening vegetation affording glimpsed views of the site. Due to the landform and the existing vegetation views from further afield including the Bratch Locks and Monarch's Way are limited. Along the canal tow path views of the site are generally absent due to the existing built form, landform and vegetation. However, occasionally filtered views of the site are seen through the gaps in vegetation.

Staffordshire and Worcestershire Canal



*Off site - View south-west from Awidge Bridge towards the site*



On site - View north-east across the site towards Trysull Road



Site





On site - View north-west across the site towards Trysull

Trysull



Site



Site

Off site - View from Staffordshire and Worcestershire Canal looking west through the cricket ground towards the site



Whitehouse Plantation (135m AOD) 3km from site

Black Hill Plantation (135m AOD) 3km from site



Off site - View from Staffordshire and Worcestershire Canal looking west towards the site



Site



Off site - View from public footpath looking south-east towards the site towards



Site





## 4. DESIGN PRINCIPLES & CONCEPT

*The Concept Masterplan, shown opposite, demonstrates the designed spatial arrangement for development at Bratch Common Road, Wombourne.*

The scheme is shaped by the following design principles:

- Provision of approximately 6.30 Ha of residential development that equates to approximately 250 new homes.
- Creation of a distinct neighbourhood, situated within a network of green space that provides a multifunctional green infrastructure resource for people and wildlife.
- Access to the site would take the form of two priority junctions from Bratch Common Road. The existing farmhouse access will be retained as a gated private access.
- Provision of a well-connected and permeable movement network that encourages active travel and enables vehicular access and circulation within the development.
- The arrangement of development blocks to ensure overlooking of public areas and green spaces.
- Placement of focal spaces within the primary movement network enhance legibility and encourage community interaction.
- Retention of existing public rights of way that are integrated within a network of other informal footpath routes. This network will be located within areas of open space, connecting with surrounding routes and the proposed residential streets and spaces.
- Sensitive treatment of the northern edge, with dwellings set back from, yet positively overlooking, this tranquil tree lined area.
- Management of surface water run-off through the integration of a sustainable drainage strategy, including a series of landscaped attenuation features set within the green infrastructure network.
- A strong frontage along Bratch Common Road, with appropriate layout and orientation to ensure the privacy and amenity is respected.
- Approximately 5.73 Ha of public open space, including attenuation features.





#### 4.1. Landscape Strategy

The objective of the Landscape Strategy is to set the development into the host landscape in a manner that achieves a sympathetic and successful assimilation in the countryside at the settlement edge.

There are three key objectives for Landscape Strategy:

- to make an important contribution to integrating the development with the host landscape of the immediate setting.
- to create a public asset of attractive green space to serve the needs of the development.
- to ensure the effects of the development are limited and contained in a manner that makes an attractive and effective new edge to the settlement.

Existing components: Public Footpath, field pattern, hedgerow and trees, will give form and structure to the new Green Infrastructure (GI). These green spaces and existing components will be connected to form a network of biodiverse planted linked spaces and habitats. It will also provide linkage to other GI assets beyond the site. These components will be retained, and the development arranged around it, to provide strategic and meaningful space with a strong sense of place.

There will be extensive areas of new publicly accessible open green space within the development including provision for a play area. The route of the public footpath will be retained. PRoW Trysull and Seisdenr3 will follow the existing hedgerow line and will be retained in open green space.

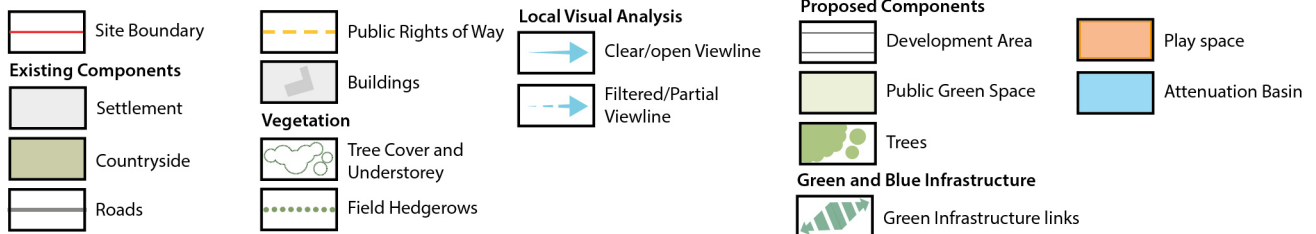
The development will be embedded within the green spaces and set back from the road, similar to the existing style, thereby creating a strong relationship with the settlement edge. New woodland planting along the northern and north-western extent of the site will create a strong relationship with the countryside and would also follow the guidance recorded within Staffordshire Planning Guidance. Woodland belts are also a characteristic feature of NCA 66.

Further trees will be planted within the south-western and north-eastern green spaces to add to the wooded character of the landscape and the views experienced.

The Sustainable Urban Drainage system will require a shallow storage basin to be created to attenuate rainwater, around the low-lying area of the site within the northern corner. This feature has been located to serve drainage operational requirements. It would have a biodiversity role as well as providing an enhancement to the development. The basin will be designed, planted and managed in a manner that serves as a public amenity.



Landscape Strategy Plan



## 5. IS THE SITE DELIVERABLE?

To be considered deliverable, sites should offer a suitable location that is not constrained by environmental or technical issues; and be readily available and achievable with a realistic prospect that new housing will be built within the early part of the Local Plan period.

The technical analysis referred to within this Vision Document and supporting documentation has demonstrated that the site is wholly deliverable, such that its allocation for residential development would be justified and substantiated by sound evidence.

The site is achievable and development can be delivered at an early stage in the emerging plan period. This is illustrated within the delivery trajectory (right). This is based on delivery by a single sales outlet, however, the site has the potential to facilitate simultaneous delivery by two housebuilders. The proportion of affordable housing assumes 40% of the dwelling total, based on Policy H2 of the South Staffordshire Core Strategy.

The site is viable and can deliver and support the physical infrastructure required to meet the needs of new residents. This will include affordable housing and open space, in addition to planning obligations being facilitated where required to improve local infrastructure.

Year	Market	Affordable	Total
2022/23	30	20	50
2023/24	30	20	50
2024/25	30	20	50
2025/26	30	20	50
2026/27	30	20	50
Total	150	100	250



## 6. SUMMARY OF ASPIRATIONS

This document has set out a vision and overview of the site and its context, emerging design principles and a masterplan concept for sustainable development.

In summary, the proposals will deliver the following key benefits and qualities:

- Approximately 250 new homes forming a new neighbourhood that includes a mix of dwelling types and tenures.
- A new development that is structured around an attractive green space resource and movement network that promotes health and active lifestyles.
- A distinctive, legible and connected place that is informed by best practice urban design principles and shaped by the retention of important site features.
- Promotion of a safe, cohesive and integrated community with excellent connectivity to the existing settlement.





**BARTON  
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