

SOUTH STAFFORDSHIRE LOCAL PLAN 2018-2038 - REGULATION 18 CONSULTATION

Representations on behalf of Persimmon Homes West Midlands

JBB8858
Final
6 December 2021

REPORT

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
Final	Submission of representations to Reg 18 consultation	DRO	PH	PH	3.12.21

Approval for issue

Paul Hill



3 December 2021

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by RPS Group Plc, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.

The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

Prepared by:

RPS

Darren Oakley BA (Hons) MA MRTPI
Principal Planner - Planning

Prepared for:

Persimmon Homes West Midlands

Contents

1	INTRODUCTION	1
2	DUTY TO COOPERATE	2
3	RESPONSE TO THE VISION AND OBJECTIVES	4
4	RESPONSE TO THE GROWTH STRATEGY (POLICY DS3)	6
5	RESPONSE TO THE DISTRIBUTION STRATEGY (POLICY DS3)	9
6	RESPONSE TO THE SUSTAINABILITY APPRAISAL	15
7	RESPONSE ON SITE ASSESSMENT AND SELECTION.....	24
8	RESPONSE TO THE GREEN BELT (POLICY DS1)	28
9	RESPONSE TO THE INFRASTRUCTURE DELIVERY PLAN	32
10	CONCLUSIONS	35

Tables

Table 6-1 Preferred Options SA summaries for Site 170	15
Table 6-2 RPS Sustainability Appraisal – Site 170	23

Figures

Figure 1-1 Land East of Brookhouse Lane, Featherstone – illustrative masterplan	1
Figure 5-1 Housing Growth – Locality 3 – Featherstone.....	10
Figure 5-2 Featherstone and nearby employment locations	13
Figure 5-3 Strategic Locations (SL) – South Staffordshire – Area 24 (orange) (SGS, 2018)	13
Figure 6-1 Proximity of Site 170 to Featherstone GP Surgery	19
Figure 8-1 South Staffordshire Green Belt Study 2019 – extract showing Parcel S20G	29

Appendices

- Appendix A – Vision Document – Land East of Brookhouse Lane, Featherstone, January 2021
- Appendix B - Highway Access and Sustainable Transport Note prepared by PJA, dated April 2020

1 INTRODUCTION

- 1.1 RPS has been commissioned to prepare representations on the South Staffordshire Local Plan Preferred Options Document ('POD') (Regulation 18) draft on behalf of Persimmon Homes West Midlands ('PH'), with respect to their interests on 'Land East of Brookhouse Lane, Featherstone' ('the Site').
- 1.2 PH has previously submitted details of the Site through the Strategic Housing and Employment Land Availability Assessment (SHELAA) call for sites process, and so the Site is well known to the Council.
- 1.3 In support of the promotion of the Site, a Vision Document has also been prepared, which has been appended to this submission (**Appendix A**). This document provides further details on the Site, including a summary of high-level technical assessments covering various issues related to the Site. This document shows that the Site can deliver sustainable development in this part of the District and would not undermine the purposes of the wider Green Belt in this location.
- 1.4 Set out below is an extract from the Vision Document, showing the illustrative masterplan for the Site. This has been informed by the technical work undertaken to date and demonstrates that development can be suitably accommodated on the Site.

Figure 1-1 Land East of Brookhouse Lane, Featherstone – illustrative masterplan



- 1.5 PH would welcome further discussions with the Council on the emerging proposals for the Site and following consideration of the representations set out in the rest of this submission.

2 DUTY TO COOPERATE

- 2.1 This section of the response considers the information published by the Council on how it claims to have met the legal requirements under duty to cooperate. This section highlights a number of concerns with the approach taken by the BCAs in addressing the requirements under the duty to cooperate. This relates to the lack of detail needed to demonstrate effective and constructive engagement has occurred up to this point in the plan-making process.
- 2.2 RPS notes that the Council has published a Duty to Cooperate Topic Paper, dated November 2021, alongside the POD, which has informed the comments set out here.
- 2.3 It is nonetheless noted that the Council has not sought views from respondents on how the Council is addressing the duty obligation, given it has not posed any specific question on this subject area.

The Duty

- 2.4 The Duty to Cooperate (DTC) is a statutory duty for all Local Planning Authorities (LPAs), introduced in November 2011 through Section 110 of the Localism Act 2011, which established a DTC in relation to the planning of sustainable development. This is recognised in paragraph 1.1 of the DTC paper. The duty requires an active, ongoing and constructive approach to addressing strategic matters relevant to the SSLP.
- 2.5 Cooperation is seen as an integral part of Local Plan preparation and should result in clear planning policy outcomes capable of being demonstrated through the examination process. Notably, Planning Practice Guidance¹ recognises that it is too late at the examination stage to seek to retrospectively rectify any deficiencies identified in relation to the legal compliance part of the independent examination, which covers matters relating to the duty. Therefore, in order to reduce the risk of non-compliance with the duty, it is important that the Council provide a clear and up to date position at each stage in the plan-making process regarding progress made on dealing with strategic matters, most notably the identified housing shortfall across the wider-HMA. Based on comments set out below, RPS raises concerns on this issue.

Demonstrating effective cooperation

- 2.6 As highlighted in the POD (at paragraph 4.1 of the DTC paper), paragraph 27 of the National Planning Policy Framework make clear that in order to demonstrate effective and on-going joint working:

"...strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national

¹ Paragraph: 031 Reference ID: 61-031-20190315 Revision date: 15 03 2019

planning guidance, and be made publicly available throughout the plan-making process to provide transparency." (RPS emphasis)

- 2.7 It is, therefore, clear that in order to demonstrate that the Council has engaged effectively on strategic matters with their neighbours, the preparation of Statements of Common Ground (SOCG) should not be left until the latter stages of the plan making process. To do so would risk undermining the transparency and, as a consequence, the wider credibility of the plan.
- 2.8 The Council does, at least, recognise the significance of preparing SOCGs, stating at paragraph 3.7 of the POD:
- “Agreement through Statements of Common Ground are now a necessity and will document the cross-boundary matters that need to be addressed and what progress has been made in dealing with them.”*
- 2.9 However, the Council has not issued any Statements of Common Ground (either in draft or finalised) alongside the POD. Consequently, without any early draft versions of the SOCGs, it is not apparent what the formal position is regarding how the Council has addressed the significant scale of unmet housing and employment need emanating from elsewhere in the wider-HMA at the Regulation 18 stage.
- 2.10 RPS notes that there are numerous references at Appendix A of the DTC paper to the preparation of SOCGs as part of ‘future proposed actions’ but this does not negate the lack of any clear outcomes emerging from the local plan review regarding the strategic matters at this stage.
- 2.11 It is therefore unclear how the engagement that has occurred to date has influenced the preparation of an effective policy outcome to deal with this strategic matter, which is contrary to national policy and also, arguably, does not meet the legal test of ‘constructive and on-going’ engagement under the duty.

3 RESPONSE TO THE VISION AND OBJECTIVES

3.1 This section provides comments on the draft vision and objectives set out in the POD.

Question 3:

a) Have the correct vision and strategic objectives been identified?

3.2 RPS has reviewed the draft vision and objectives and does not wish to raise any particular concerns at this stage. However, RPS notes that the POD does not seek views on the appropriateness of the proposed plan period for the SSLP (currently 2018 to 2038). Nevertheless, despite this omission, RPS has some comments make on this matter.

Plan Period

3.3 The POD proposes a plan period covering the timeframe 2018 to 2038. This, RPS assumes, would equate the Council's estimate that the SSLP will be adopted during 2023 and would therefore run for the minimum period allowed for in the NPPF (currently 15 years) up to 2038.

3.4 RPS does not agree with the end date of 2038 as proposed. Instead, RPS takes the view that the timescale for the SSLP should be consistent with those plans of its neighbours who are at a similar stage in the process (Regulation 18) to itself, notably the Black Country. The emerging plan review for the Black Country ('Black Country Plan') is currently at the same stage as the SSLP review. However, the end date for the Black Country Plan is currently 2039. This is one year ahead of the SSLP plan period. This means that the SSLP is not only planning for one year's less annual housing growth to meet local needs, but it is also contributing one year's less unmet housing need from the Black Country. RPS can see no reason as to why the plans should not be aligned across the same periods

3.5 Whilst a single year is not significant in terms of the difference in timeframes between the two plans, it does make a difference in terms of housing numbers that should be planned for in the SSLP. By extending the plan forward by one year, this would increase the local housing need for South Staffordshire by at least 243 dwellings, but would also increase the potential contribution toward the unmet needs of the Black Country by at least 200 dwellings². This would generate an overall 'minimum' increase of 443 dwellings based on extending the SSLP forward one year from 2038 to 2039.

3.6 There are clear benefits in extending the plan period forward to align with those of neighbouring plans such as the Black Country Plan. The extension of the plan period to align with its neighbours would go some way towards helping to further reduce the shortfall in housing in the conurbation and would represent an effective planning response on this matter.

² On the basis of 4,000 dwellings contribution over a 20-year period, equating to 200 dpa

- 3.7 RPS therefore recommends that the plan period for the SSLP is adjusted to align with that of the Black Country Plan to allow for a more integrated approach to addressing unmet need in the wider-HMA.

4 RESPONSE TO THE GROWTH STRATEGY (POLICY DS3)

Question 5:

Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? If no, please explain how this policy should be amended?

- 4.1 Policy DS3 - The Spatial Strategy to 2038 comprises two broad elements; one which defines the overall level of housing growth to be planned for in the District; and the other element which proposes the settlement hierarchy to which future housing growth is to be directed. This section provides comments on the draft growth strategy, in particular with respect to the proposed housing requirement for the District up to 2038. The next section following this deals with the proposed distribution of housing growth in the District.

Meeting local housing needs

Starting point

- 4.2 Policy DS3 identifies a local housing need of 4,131 dwellings (or 243 dwellings per annum) based on the latest standard method calculation set out in the PPG, using a start date of 2021 see Table 7 of the POD). This figure is expressed as a 'minimum' and is derived from the demographic assumptions based on the 2014-based sub-national projections. However, it is unclear whether other relevant factors, including employment growth in the District, has been taken into account in determining the appropriate minimum level of housing need to be provided for in the SSLP.

Accounting for employment growth

- 4.3 Planning Practice Guidance³ identifies those circumstances that might justify a higher housing need figure than the standard method would indicate. This is because the standard method does not attempt to predict the impact that future government policies, changing economic circumstances, or what impacts other factors might have on demographic behaviour. This covers a range of factors, including '*growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth*'. This would include major new employment investment in the District that is not accounted for when projecting forward future housing need.
- 4.4 One such example is of relevance in South Staffordshire, notably the proposals to deliver the West Midlands Interchange (WMI) at Four Ashes. This site is allocated in the POD, under Policy SA7, with an expectation that 232.5 hectares of employment development will be delivered by 2038. This scheme is also expected to deliver around 8,550 jobs in the District⁴. Paragraph 4.56 of the POD acknowledges that the WMI,

³ Paragraph: 010 Reference ID: 2a-010-20201216 Revision date: 16 12 2020

⁴ West Midlands SRFI Employment Issues Response Paper – Labour Supply, Stantec, May 2020

“...significantly increases the known oversupply of employment land in South Staffordshire, and with this, the scope to contribute towards unmet needs elsewhere in the FEMA...”

- 4.5 The total supply of employment land in South Staffordshire is estimated to be in the region of 340 hectares (see Table 9 of the POD). This is against an estimated need for between 67-86 hectares (see paragraph 5.11 of the POD). The estimated over-supply of employment land is therefore in the region of 254-273 hectares, depending on the scale of employment need. The delivery of the WMI project could therefore lead to a significant change in the demand for labour in the District, as well as potentially assisting in addressing unmet employment need from the Black Country. However, it is unclear from the published evidence whether the potential impact on the demand for housing within the District, as a result of the jobs growth at WMI, has been taken into account in determining the minimum local housing need figure now proposed in the POD. From the review of the published evidence undertaken by RPS, this appears not to be the case.
- 4.6 RPS therefore recommends that the Council revisits its assessment of local housing need in order to properly assess the impact of planned future employment growth in the District and consider the implications of the significant level of over-supply of employment land identified in the POD.

Unmet housing needs from the wider housing market area

- 4.7 In addition to the minimum local housing need figure of 4,131 (which RPS raises concerns on as set out above), Policy DS3 proposes a contribution of 4,000 dwellings to assist in addressing the housing shortfall across the wider-HMA. This would therefore result in a total minimum housing requirement of 8,881 dwellings for period 2018-2038. Having reviewed the POD, RPS has a number of concerns with the approach taken on this matter.
- 4.8 Paragraph 4.10 of the POD clarifies that the 4,000 dwelling contribution is,
- “...based on the scale of growth implied in the district by the strategic locations identified in the GBHMA Strategic Growth Study...”*
- 4.9 The Strategic Growth Study (SGS) was published in February 2018, and covered need and supply of housing across the Greater Birmingham HMA up to 2036. The Council acknowledges that events have moved on since this study was published, notably the emergence of a substantial level of unmet housing need identified in the Black Country, totalling 28,239 dwellings up to 2039 once all sources of supply within the conurbation have been identified⁵. The scale of unmet need is higher than previous estimates, based in part on higher estimates of housing need for the Black Country (using on the standard method and 35% urban centres uplift) and lower estimates of supply from land within the existing built-up area. Similarly, the scale of the shortfall is not only significant in scale but also extends beyond the end date of the SGS (2036) by three additional years, to 2039.

⁵ Draft Black Country Plan 2039 (Regulation 18) August 2021, paragraph 3.21

- 4.10 This new evidence on the housing shortfall in the Black Country was clearly not taken into account in the SGS as it post-dates that report. The SGS is therefore silent on matters relating to the housing shortfall in the Black Country now known today. RPS therefore contends that the position has changed to the extent that the SGS has potentially under-estimated the scale of the housing shortfall across the GBHMA, in particular from the Black Country. Due to the reliance placed on the SGS by the Council in determining the 4,000 dwellings contribution, the unmet need from the Black Country has not been properly factored into consideration of the overall contribution that South Staffordshire should be making towards meeting this shortfall. RPS therefore contends that the proposed contribution has not been adequately justified in light of all the available evidence. On this basis, RPS recommends that the Council should properly revisit the implications of the new evidence regarding unmet need from the Black Country and consider contributions in excess of the 4,000 dwellings currently proposed in the POD.
- 4.11 In conclusion, RPS as identified a number of concerns which go to the heart of the appropriateness of the housing requirement. These concerns should be reflected upon and addressed as part of the next iteration of the SSLP.
- 4.12 Furthermore, the emerging evidence on the housing shortfall from elsewhere in the GBHMA was also not taken into account in the SGS with respect to the identification of the 'strategic locations' assigned to South Staffordshire to help address the wider-HMA unmet need up to 2031 and, potentially, beyond to 2036 as part of the proposed spatial strategy. RPS contends that the 'areas of search' defined in the SGS should be revisited to incorporate consideration of other site options located in close proximity to these areas. This is relevant to consideration of the land at Brookhouse Lane being promoted by Persimmon Homes at Featherstone. RPS considers this matter in more detail in the next section.

5 RESPONSE TO THE DISTRIBUTION STRATEGY (POLICY DS3)

Question 5:

Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? If no, please explain how this policy should be amended?

5.1 This section provides comments on the Council's proposed spatial strategy for the distribution of growth over the plan period set out in Policy DS3, with particular attention given the approach being proposed at Featherstone.

Spatial Strategy for Housing

5.2 RPS notes that the Council is maintaining its preference for an 'infrastructure-led' strategy for the distribution of growth, as stated in paragraph 4.60 of the POD. This carries forward the preferred strategy option (Option G) identified in the Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation in October 2019. In this context, Policy DS3 makes clear that throughout the District, growth will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy, whilst recognising opportunities to deliver local infrastructure. The strategy also seeks to maintain and enhance the natural and historic environment and the local distinctiveness of the district and retain and reinforce current settlement patterns.

5.3 To achieve these broad aims, the distribution of growth is defined in Policy DS3, as follows:

- Tier 1 settlements - Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley.
- Tier 2 settlements - Wombourne, Brewood, Kinver, Perton and Huntington.
- Tier 3 settlements - Essington, Coven, **Featherstone**, Shareshill, Wheaton Aston, Pattingham and Swindon.
- Tier 4 settlements - Bednall, Bishops Wood, Bobbington, Dunston, Himley, Seisdon and Trysull.
- Tier 5 settlements – smaller settlements where only very growth is envisaged.
- Growth adjacent to the neighbouring towns and cities in the Black Country, comprising:
 - Land at Cross Green (includes reference to potential for a rail-based parkway on land safeguarded at this site).
 - Land north of Linthouse Lane.
 - Land at Langley Road.
- Growth adjacent to the town of Stafford.
- The district's five freestanding strategic employment sites (West Midlands Interchange, i54 South Staffordshire, Hilton Cross, ROF Featherstone/Brinsford and Four Ashes).

5.4 Table 8 of the POD provides a breakdown of how the housing growth will be distributed across the District based on the strategy and the settlement hierarchy, including the level of growth assigned to Featherstone. The POD (at paragraph 4.19) identifies a number of factors that have informed the housing numbers proposed for each settlement / broad location, as follows:

- The settlement hierarchy, informed by the Rural Services and Facilities Audit 2021.
- The evidence base, notably the GBHMA Strategic Growth Study 2018.
- the level of constraints present around each settlement / broad location.
- and what are loosely described as ‘national policy factors’.

5.5 RPS has already identified concerns with applying the Strategic Growth Study findings in its current form, given that it has not taken into account more recent evidence relating to unmet housing need emanating from the Black Country. RPS maintains the view that the Council should broaden the ‘areas of search’ beyond those currently identified to include settlement is in close proximity to them, notably Featherstone. RPS considers this point in more detail below, as part of a wider response on the Council’s approach to distributing growth at Featherstone

Strategy for distributing growth at Featherstone

Summary of approach

5.6 Under Policy DS3, Featherstone is identified as a ‘Tier 3 settlement’. In line with its position in the hierarchy, Table 8 of the POD assigns 120 dwellings to Featherstone over the plan period, comprising 84 dwellings from existing sites with planning permission and site identified in the Site Allocation Document, and 39 dwellings on one site previously safeguarded for release from the Green Belt. This represents 1.2% of the total amount of housing land provided for in the POD. Therefore, the POD does not propose any further site allocations or any additional release of land from the Green Belt at Featherstone. The extent of the proposals at Featherstone are shown in Appendix 3 of the POD (for copyright reasons, these are not reproduced here). Figure 5.1 below, taken from the POD, provides a diagrammatic representation of the proposals (showing the safeguarded site only) for Locality 3, which includes Featherstone.

Figure 5-1 Housing Growth – Locality 3 – Featherstone



5.7 RPS notes that the two sites identified in the POD for housing development are located to the west of Brookhouse Lane, but are wedged between the existing built-up area of the settlement and the proposed for 'green infrastructure' adjacent to the ROF Featherstone employment site further to the west. The provision of this new area of green space would thus restrict any further extension of the built-up area to the west of the settlement. The rest of the settlement is tightly bound by existing Green Belt and areas of high landscape sensitivity, with very little opportunity for further infilling within the built-up area. Any further growth at Featherstone would therefore require an alteration to the existing Green Belt boundary. The precedent for this has already been established by the release of the two sites identified in the POD which were both formerly located in the Green Belt. It is therefore appropriate to consider the potential for further growth to be directed to Featherstone in this context, recognising that this would necessitate the alteration of the Green Belt in this location.

Evidence base relating to the Settlement Hierarchy

5.8 The key piece of evidence base used to inform the proposed settlement hierarchy, and thus the basis for the proposed distribution of housing growth across the District, is the Rural Services and Facilities Audit 2019. Paragraph 1.1 of the audit states,

"The purpose of this report is to offer evidence on the relative level of services and facilities present in settlements within South Staffordshire. This then allows the study to propose a revised settlement hierarchy..." (RPS emphasis)

5.9 In assessing the relative sustainability of Featherstone, a number of indicators have been applied in the audit (listed at paragraph 3.2 of the report), notably:

- Access to food stores
- Diversity of accessible community facilities/services
- Access to employment locations
- Access to education facilities
- Public transport access to higher order services outside of the village

5.10 In relation to access to employment locations, the audit scores Featherstone as 'medium' (see Appendix 4 of the audit), but scores Featherstone amongst the highest settlements in terms of public transport access to higher order services outside the settlement (see Appendix 5 of the audit).

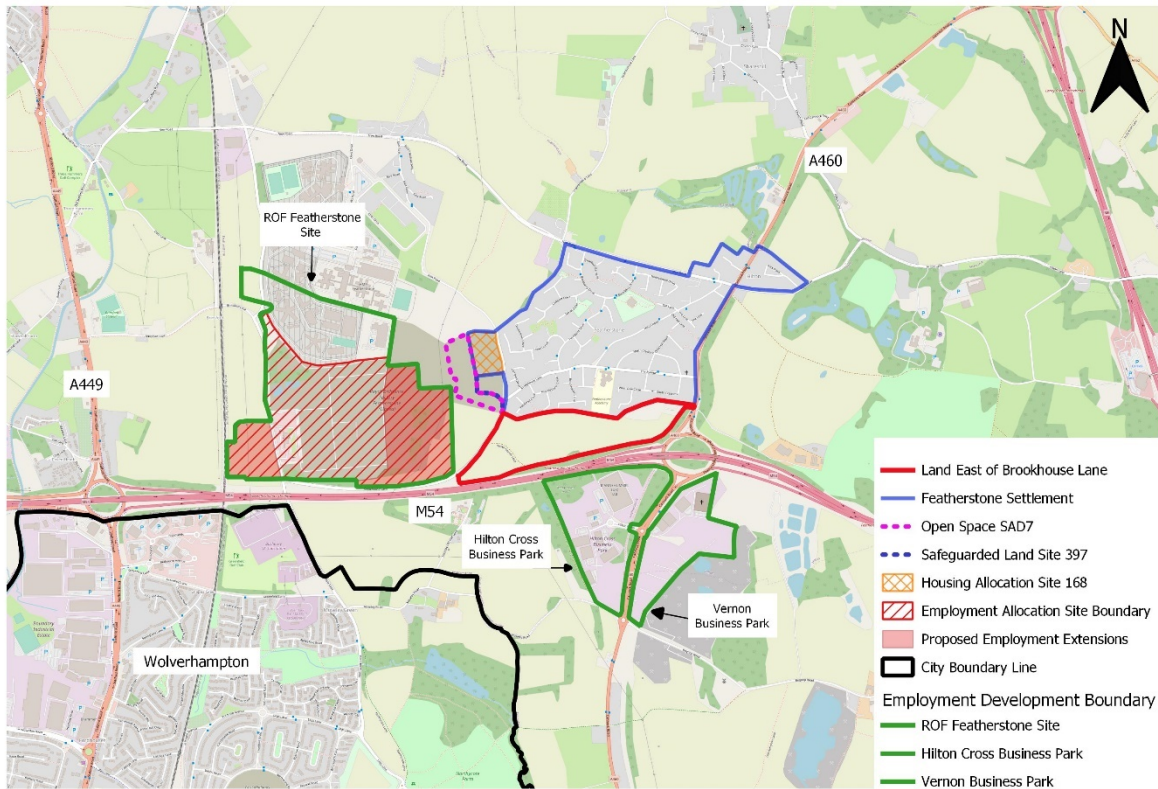
5.11 The basis for the 'medium' score for access to employment locations related to Featherstone is set out in Appendix 3 of the audit. The analysis utilises the 'Hansen' methodology, which has been applied with respect to accessibility to defined employment centres. RPS notes that the analysis has identified two 'employment sites' in close proximity to Featherstone, which we assume to be the HMP Featherstone (located to the north-east edge of the settlement) and Hilton Main Industrial Estate (located to the south of junction 1 of the M54, east of the A460), as neither sites are named in the audit.

- 5.12 However, RPS considers that two additional employment sites have been excluded from the assessment, namely Hilton Cross Business Park (located south of Junction 1 M54, to the west of A460) and the ROF Featherstone employment site (which is currently the subject of a planning application ref. 20/01131/OUT awaiting determination). RPS contends that these sites are well located to Featherstone (both less than 800 metres from the edge of the settlement) and would provide good access to local employment for residents either on foot or by public transport.
- 5.13 On this basis, these two sites are clearly relevant to the assessment of employment locations available to local people living in Featherstone and thus are relevant to the consideration of future growth locations identified through the SSLP at Featherstone. When taking into account the provision of existing employment at Hilton Cross Business Park, and the emerging provision at ROF Featherstone, this would, in RPS opinion, lead to a different score for Featherstone in terms of access to employment. RPS suggest that a score of 'Good', and not 'medium', is more appropriate in this regard.
- 5.14 The under-scoring of Featherstone with respect to access to local employment, as shown above, raises wider implications for the overall approach to the distribution of growth to Featherstone. This is discussed below.

Alternative approach to distributing growth

- 5.15 At present, the draft spatial strategy (including the settlement hierarchy) is driven largely by the current provision of services and facilities located within existing settlements, but also by the evidence on 'strategic locations' outlined above drawn from the GBHMA Strategic Growth Study (SGS) 2018. Given the concerns raised above on both these aspects of the evidence base, RPS contends that greater consideration should be given in the spatial strategy to opportunities for co-locating new homes and jobs. By doing so, this would help to promote sustainable development in such a way that can lead to a reduction in commuting distances, reductions in reliance on car journeys, and reductions in air pollution, which can all contribute towards helping the Council to address wider issues such as climate change. Such an approach would also be consistent with national policy objectives, which supports an appropriate mix of uses across the area, including to help minimise journey lengths for employment (NPPF, paragraph 106).
- 5.16 RPS contends that an ideal opportunity to achieve this is by focusing more growth at Featherstone. As alluded to above, Featherstone is located in close proximity to a number of large-scale employment sites offering easy access for people to local jobs. This includes Hilton Cross Business Park, Hilton Main Industrial Estate, HMP Featherstone, and wider afield to i54, as well as relative proximity to emerging employment centres at ROF Featherstone (the closest) and the West Midlands Interchange site (WMI) at Four Ashes. The plan below illustrates how close Featherstone is located in relation to the nearest employment centres.

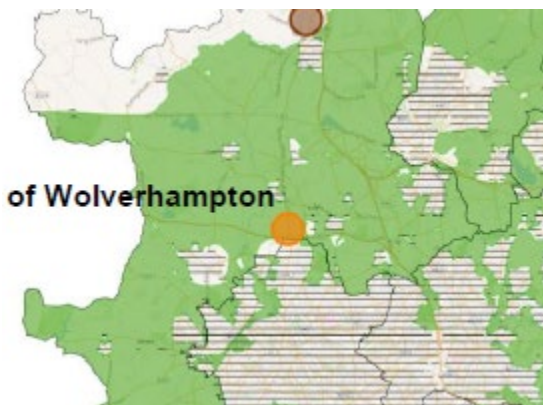
Figure 5-2 Featherstone and nearby employment locations



5.17 As can be seen, Featherstone and the Site are well-located in strategic terms, being close to a range of local employment, but is also accessible to the West Midlands conurbation via public transport (i.e. bus service 67 Wolverhampton - Cannock via Shareshill).

5.18 In addition, Featherstone is in relatively close proximity to the east of one of the Strategic Locations identified in the SGS (area 24 – North of Wolverhampton). The map extract below, taken from the SGS, illustrates where SL 24 is located.

Figure 5-3 Strategic Locations (SL) – South Staffordshire – Area 24 (orange) (SGS, 2018)



5.19 Whilst not located directly within the current SL, given the SGS may well have under-estimated the scale of need across the wider-HMA and, thus, the scale of the shortfall from the conurbation, RPS

advocates for a wider 'area of search' to include land at Featherstone that should be given greater consideration.

- 5.20 Featherstone is therefore ideally placed to accommodate additional housing to help balance the provision of employment currently provided and also planned for in the future, as well as further assist in addressing the identified housing shortfall in the wider-HMA. This 'balanced approach' to homes and jobs can assist in reducing the level of out-commuting, which the Council has identified as a key challenge for the District (see Table 4 of the POD).
- 5.21 The site at Brookhouse Lane, being promoted by Persimmon Homes, represents an ideal opportunity to help deliver this.

6 RESPONSE TO THE SUSTAINABILITY APPRAISAL

6.1 This section provides a response on the sustainability appraisal of ‘Land at Brookhouse Lane, Featherstone’ (SHELAA site ref. 170) being promoted by Persimmon Homes West Midlands. The comments are made in response to the Sustainability Appraisal of the South Staffordshire Local Plan Review Preferred Options Plan Regulation 18 (III) SA Report, August 2021 (‘SAPOP’).

Summary of Council’s sustainability appraisal of Site 170

6.2 Set out below is a summary table showing the appraisal summaries for the site taken from the SAPOP. These relate to the ‘pre- and ‘post-mitigation’ appraisals the site. For reference, the pre-mitigation summary is set out in Table 4.4 of the SAPOP, whilst the post-mitigation summary is set out in Table 6.1 of the SAPOP.

Table 6-1 Preferred Options SA summaries for Site 170

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Featherstone												
Post-mitigation	+/-	+	+/-	-	-	-	+	-	0	-	-	-
Pre-mitigation	+/-	--	-	-	-	-	+	-	-	-	-	-

6.3 The Council considers that site 170 has a number of significant negative effects for residential development, even after mitigation measures are taken into account. RPS has reviewed the evidence presented by the Council in the SAPOP, and does not agree with the findings against a number of SA objectives. This is set out below.

RPS review and assessment of significant effects – Site 170

6.4 The Council’s detailed findings with respect to significant effects on site 170 are presented in section B.12 of the SAPOP, alongside all the other reasonable alternative sites identified at Featherstone.

6.5 It is important to note that the summary table and commentary presented in this section of the SAPOP only covers the ‘pre-mitigation’ element of the SA of site options; there is no explanation given as to the basis for the ‘post-mitigation’ appraisal of the sites set out at Table 6.1 of the SAPOP, including site 170. Consequently, it is not clear as to the reasoning is behind the Council’s conclusions on post-mitigation, which therefore represents a clear gap in the SA approach.

6.6 Similarly, the SAPOP presents a number of tables that identify the ‘best performing site options’ against each SA objective (see Tables 4.5 to 4.14 of the SAPOP for the schedule of sites). RPS has

a number of concerns with this approach. Firstly, it is not clear whether the sites included in these tables reflect the 'pre' or 'post' mitigation scenario. Secondly, each table identifies a different number of sites against each SA objective, which raises concerns that significant degree of subjectivity has been applied in preparing these tables. Without a clear methodology to underpin the choice of best performing sites, RPS suggests these tables provide limited added value to the SA process.

6.7 Nevertheless, RPS has reviewed the SA findings for site 170 and disputes the findings against a number of the SA objectives. As part of this response, RPS also provides its own assessment of effects based on the Council's own SA methodology.

RPS response on significant effects – Site 170

6.8 For clarification, the analysis set out here relates to the 'post-mitigation' appraisal for the site.

SA Objective 4 - Landscape and Townscape

6.9 The Council has determined that site 170 would have a 'minor negative' effect in relation to both Green Belt harm (see paragraph B12.4.2) and landscape impact (see paragraph B.12.4.5).

6.10 RPS objects to the findings of effects against this objective.

6.11 With respect to Green Belt, RPS would question the relevance of including consideration of Green Belt under this objective, given the fact that Green Belt is a strategic designation based on five purposes that do not relate to landscape. In any event, based on evidence set out in the Vision Document (Appendix A, page 30-31), RPS does not agree with the Council that development on this site would cause 'moderate harm' to the Green Belt purposes.

6.12 In relation to landscape sensitivity, RPS would highlight the point that previous proposals (06/00638/OUT) submitted on this site would not have led to significant landscape impact, as summarised in the Vision Document (Appendix A, page 3). In particular, the Secretary of State agreed with the Inspector (at paragraph 27 of his final report) that the site is very well contained within firmly defined boundaries and that the scheme would not have a materially harmful effect on the landscape character of the area.

6.13 In addition, the revised proposals for the site are supported by a Landscape and Visual Impact Appraisal, which has informed the illustrative masterplan for the site (Appendix A, page 4). The masterplan shows that a significant portion of the site would remain as open land with improvements to landscaping within and along the boundary of the site. This would further reduce any potential landscape impact from new development in this location.

6.14 On this basis, RPS would recommend that the score for the site should be amended to 'neutral' in light of the response set out above.

SA Objective 5 – Pollution and Waste

6.15 The Council has determined that site 170 would have a 'minor negative' effect in relation to this SA objective. In relation to air and noise, the reason given is due to the proximity of the site to the M54,

which could potentially expose some site end users to higher levels of transport associated air and noise pollution. Also, the Council claims that traffic using the A460, M54 and A449 would be expected to have a minor negative impact on air quality and noise at the site.

- 6.16 In relation to watercourses, the reason given for the minor negative score is that a proportion of the site is located within 200m of a minor watercourse and that, because of this, development at the site could potentially increase the risk of contamination of this watercourse.
- 6.17 RPS contends that these effects are over-stated when taking into account the potential for mitigation. On the potential for negative air and noise effects from the M54, the Vision Document (page 40) highlights that the issue of noise was considered as part of the earlier planning application and appeal at the site (referred to above) and both the Planning Inspector and the Secretary of State concluded that this would not represent a barrier to development and that the detailed design stage would be the appropriate time to consider suitable mitigation. The Illustrative Masterplan (Appendix) shows that the proposed dwellings would be a minimum of 100m from the M54, but parts of the built development would be over 200 metres from the motorway. Notably, there would be more than sufficient space to provide any necessary noise mitigation measures within the proposed linear country park. Furthermore, it is noted that under SA Objective 8 (Health and Well-being) that the site is located more than 200 metres from an Air Quality Management Area (AQMA). This is clear sign that air pollution is unlikely to lead to significant effects as a result of development being located on the site, and would score the site as 'neutral' under this objective.
- 6.18 RPS also notes that pollution effects has not been identified by the Council as reasons to reject the site as a potential allocation (see Housing Site Selection Topic Paper Appendix 3 – Site Proformas). Similarly, air quality issues can be satisfactorily addressed at the detailed design stage and does not preclude development from coming forward on the site.
- 6.19 For water, RPS highlights that the illustrative masterplan shows that any built development would set back from existing watercourses in the vicinity and within the site and, notably, a sustainable urban drainage system will be designed and installed as part of development on the site. These measures would mitigate the potential negative effects identified in the SAPOP.
- 6.20 For these reasons, RPS contends that the overall score under this objective should be altered to 'neutral'.

SA Objective 6 - Natural Resources

- 6.21 The Council has determined that site 170 would have a 'minor negative' effect in relation to this SA objective. This is due to the site being deemed 'previously undeveloped' and that development of the site would result in an '*... inefficient use of land and the permanent and irreversible loss of ecologically valuable soils....*' (see paragraph B.12.61 of the SAPOP). In addition, the Council claims that the site is part of ALC Grades 2 or 3, and so development would lead to the loss of this '*...agriculturally important natural resource...*' (see paragraph B.12.6.2).
- 6.22 RPS disputes the score on the site. Firstly, the site has been used for cultivation more many years and so, for the vast majority of the site, it is disputed whether the soils are, in fact, of 'ecologically

valuable' given its current use. This is supported by technical work undertaken to inform the Vision Document (Appendix A, page 39) which indicates that the site is '*...largely of low ecological value in terms of the habitats and species that it supports...*'. It is therefore important to note that the low value habitats found on the site are there as a result of the soils on the site. Secondly, the SA methodology used to score the site as minor negative in relation to agricultural land is predicated on the mis-conception that all land within grade 3 is 'best and most versatile' (BMV). This is not the case, as only land that is classed as 'Grade 3a' should be considered potentially BMV land⁶. Similarly, whilst the site is noted as being within an area graded Grade 3, no evidence is presented by the Council which shows the site to be of Grade 3a value, and thus classed as BMV land.

6.23 In light of the above, RPS contends that the site should not be scored 'minor negative' under this objective without sufficient evidence to support the Council's claim. RPS notes that the SA methodology only allows for score or 'negative' or 'positive', but does not allow for 'neutral' or 'uncertain' scores under this objective. Furthermore, given the errors identified in the SA methodology highlighted above, RPS suggests that the site cannot be scored with any degree of certainty and so no score should be applied in this case.

SA Objective 8 – Health and Well-Being

6.24 The Council has determined that site 170 would have a 'minor negative' effect in relation to this SA objective. This is because of the following:

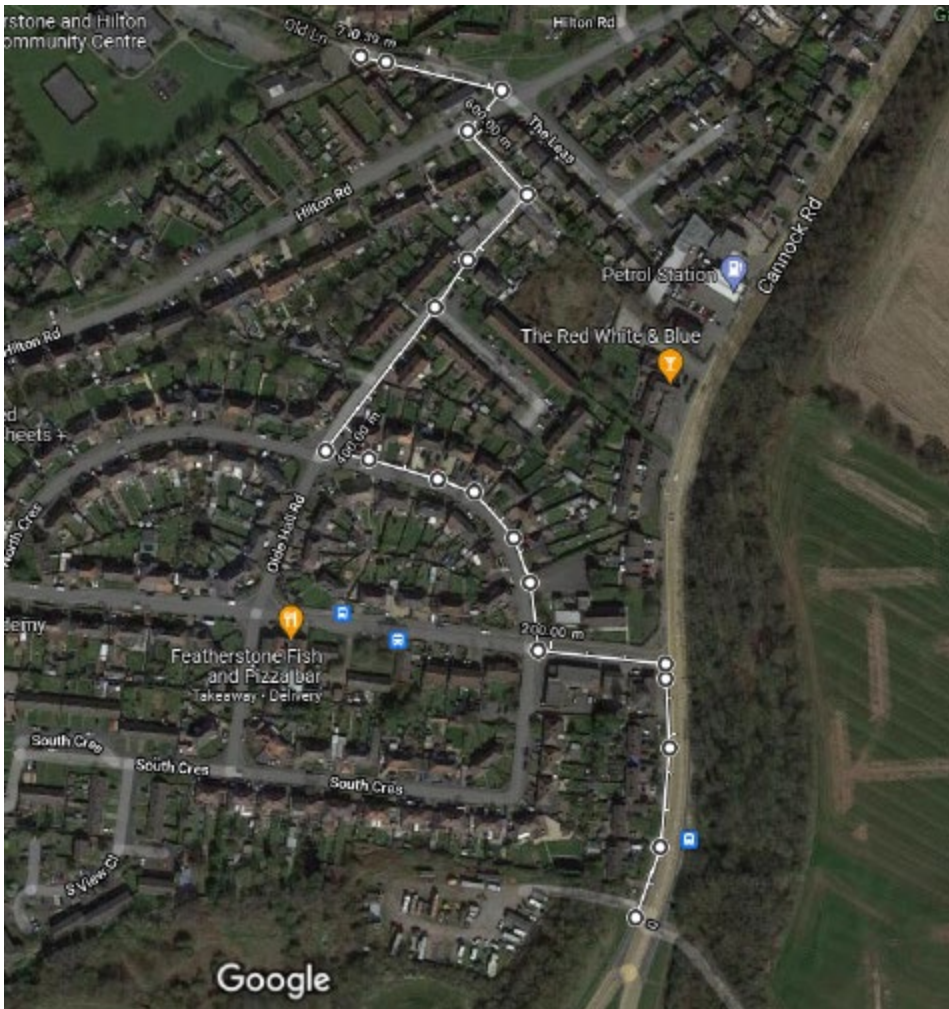
- Air Quality Management Area – site 170 is located over 200 metres from a designated AQMA or main road – 'minor positive' (see B.12.8.4)
- Access to Health Facilities – site 170 is located within the target distance (5km) from the nearest hospital (New Cross); wholly or partially outside the target distance to the GP surgery on Old Lane – 'minor negative' (see B.12.8.);
- Access to leisure facilities – site 170 is located over 1.5 km from the nearest leisure centre – 'minor negative' (B.12.8.3)
- Access to green network (PROW/cycle network)– site 170 is located within 600m of the PROW network – 'minor positive'

6.25 Having reviewed the Council's, RPS disputes the overall score of 'minor negative' assigned to the site. This is because, even when accepting the Council's appraisal under each sub-category above, the conclusion is a finely balanced one, given that two show 'minor negative' and two show 'minor positive' effects. However, RPS disagrees with the findings relating to proximity to health facilities, with particular reference to Featherstone GP Surgery. The Council claims that site 170 is located over 800 metres from the surgery and so would score a 'minor negative'. RPS disputes this, based on the distance measured between the site boundary off the A460 and the entrance to the surgery (using Google maps measurement tool). Using this tool, RPS has calculated the distance to be

⁶ *Guide to assessing development proposals on agricultural land*, Natural England, Updated 5 February 2021, section 4

approximately 710 metres when using available public footpaths. This is shown in extract map below.

Figure 6-1 Proximity of Site 170 to Featherstone GP Surgery



6.26 When the correct distance measure is applied, this would mean the site is located within 5km of the nearest hospital, and within 800m of a GP Surgery or 1.5 km from a leisure centre. The site would therefore score ‘minor positive’ against this aspect of the objective according to the SA methodology (see Box 3.8 of the SAPOP).

6.27 Therefore, under this objective, the site would only score ‘minor negative’ under access to leisure facilities, and ‘minor positive’ under the other three factors. On a fair and reasonable interpretation of the correct findings for this objective, the site should score ‘minor positive’ and not ‘minor negative’. RPS recommends that the SA is adjusted accordingly to reflect the analysis set out above.

SA Objective 10 – Transport and Accessibility

6.28 The Council has determined that site 170 would have a ‘minor negative’ effect in relation to this SA objective. This is for the following reasons, notably:

- Bus stops - site 170 is partially or wholly located outside the target distance of 400m.
- Railways stations - site 170 is partially or wholly located outside the target distance of 2km.

- Local Services (convenience stores) – site 170 is located outside the target distance of 2km.

6.29 RPS disputes the assertion that the site would have a minor negative impact with respect to access to bus stops and local services.

6.30 With regards to bus stops, the Council applies a threshold of 400m or less as the basis for measuring the impact on end users' access to bus services. However, RPS contends that the use of a 400m threshold is unduly restrictive and does not accord with national standards on accessibility, and also is inconsistent with other parts of the evidence which also considers access to services.

6.31 The latest available national guidance on what is an appropriate walking distance (or time period) to local services, including bus services, is set out in Manual for Streets (MfS), published by CLG/Department of Transport in 2007. Whilst slightly dated, it remains the most up to date official position regarding accessibility standards for plan-making purposes. Section 4.4 of MfS provides guidance on what is termed 'walkable neighbourhoods'. MfS defines these as,

"...typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot..."

6.32 The vision document (Appendix A, page 36) submitted alongside these representations highlights the presence of bus services operating in close proximity to the site. These services include bus stops located on the A460 to the east of the site, with other bus stops located on Brookhouse Lane, and also on Turnberry Drive both located to the north within the built-up area of Featherstone. All these services are located within 800 metres from the centre of the site when accessing the stops from the local footpath network.

6.33 Given these services are available within 800 metres from the site, RPS contends that the site supports the delivery of walkable neighbourhoods for local residents, in line with national guidance, and thus promotes sustainable development. However, when applying the Council's SA methodology, this would not be the case.

6.34 Furthermore, the use of a 400m threshold differs from those used by the Council as part of its rural services audit. Specifically, the Rural Services and Facilities Audit (RSFA), which applies a proximity 'range' of between 800 to 2,000m (see paragraph 3.17 of that report). In applying this range, the RSFA makes reference to Manual for Streets (under footnote 4) which the audit considers to be '*...an acceptable walking distance to services and facilities...*'. The use of the 400m threshold is clearly at odds with the Council's own evidence on accessibility standards. The SA provides no justification for the use of such a punitive indicator that is half the distance of the standards defined at a national level.

6.35 For the reasons given above, RPS contends that the SA methodology for this objective is not robust and does not allow sufficient flexibility for those sites that accord with nationally defined access standards, such as those set out in Manual for Streets. RPS contends the SA methodology for this objective is not fit for purpose as a reasonable measure of significant effects.

- 6.36 Consequently, when applying the national standards and those used elsewhere in the Council's evidence base, as a measure of access to local services, site 170 would clearly score 'minor positive'.
- 6.37 RPS also disputes the Council's suggestion that site 170 is located beyond 2km of a convenience store, and thus would score 'minor negative'. This finding again ignores the findings of the RSFA, which identified three convenience stores, all within Featherstone village centre (see Appendix 4, page 5). On this basis, the SA score is incorrect.
- 6.38 Again, when appraised properly, the site would score 'minor positive' in relation to this aspect of the objective.
- 6.39 In summary, when the appraisal of significant effects is revisited and adjustments made in light of the issues and concerns raised above, the only minor negative score under this objective would relate to access to a railway station (though this is likely to equally affect all sites identified at Featherstone). On this basis, RPS contends that site 170 would, in overall terms, have a 'minor positive' impact on access to transport and accessibility. The score for site 170 is therefore wrong, and should be adjusted accordingly.

SA Objective 11 - Education

- 6.40 The Council has determined that site 170 would have a 'minor negative' effect in relation to this SA objective. This is for the following reasons, notably:
- Secondary schools – site 170 is located outside the target distance (1.5km) to the nearest secondary school.
- 6.41 RPS disputes the basis for the criteria identified in the SA methodology, and thus disagrees with a 'minor negative' score applied to site 170 against this objective. The 1.5km threshold applied under this objective equates to a distance of less than one mile (0.9 miles). However, both national⁷ and local⁸ guidance applies a wider distance threshold in measuring appropriate distances between home and school locations. These are based on the use of 3 mile distance for pupils aged 8 and above, which includes pupils who attend secondary school. Site 170 is located approximately 1.7 miles from Moreton School (using Google maps) and so falls within this threshold. On this basis, RPS considers the distance thresholds applied under this SA objective to be arbitrary in nature and are not based on any local assessment of what would constitute an appropriate distance between home and school for children living in South Staffordshire, and in particular those children living in Featherstone.
- 6.42 RPS therefore contends that the minor negative score under this objective is not correct because the basis for it, as set out in the SA methodology, is wholly inconsistent with national advice on measuring accessibility and contradicts the approach taken to assessing access to services applied

⁷ Department of Education, *Home to school travel and transport guidance Statutory guidance for local authorities* July 2014

⁸ Staffordshire County Council *Home to School/College Travel Policy and Guidance* Updated June 2021

elsewhere by the Council. When applying the thresholds in national guidance, site 170 achieves a 'minor positive' score. On that basis, the score for site 170 under this objective should be adjusted to 'minor positive'.

SA Objective 12 – Economy

6.43 The Council has determined that site 170 would have a 'minor negative' effect in relation to this SA objective. This is for the following reasons, notably:

- Site 170 is located in an area with 'unreasonable' sustainable access to employment opportunities (see paragraph B.12.12.1 of the SAPOP)

6.44 RPS disputes this score. The SA methodology (see Box 3.12) defines 'minor negative' as follows:

“Residential-led development proposals that would place site end users in locations with unreasonable or poor access to employment opportunities (the lower half Hansen scores, or adjacent to a village/urban area with Hansen score coverage to some extent) would have a minor negative impact on access to employment opportunities.” (RPS emphasis)

6.45 And for 'minor positive' impacts, this is defined as,

“Residential-led development proposals that would place site end users in locations with good or reasonable access to employment opportunities (the upper half Hansen scores) would have a minor positive impact on access to employment opportunities.” (RPS emphasis)

6.46 In relation to the use of Hansen scores for the appraisal of sites against this objective, the SAPOP (see paragraph 3.12.3) states,

“Hansen scores for public transport access to employment opportunities were used, which measured the number of destinations which could be accessed within 60 minutes journey time.”

6.47 The SAPOP provides very little supporting analysis to justify this score. Nonetheless, it is important to note that the Hansen scoring approach has been applied by the Council in the Rural Services and Facilities Audit (RSFA) of settlements. The RSFA defined Featherstone, and thus site 170, as having 'medium access to employment' (see Appendix 4 and 5 of the RSFA). Based on this finding, it is wholly wrong to suggest that Featherstone, and the site itself, has 'unreasonable' access to local employment opportunities.

6.48 Given that locations with 'good' access to employment would fall within the 'upper quartile Hansen score' (see table on page 7 on the RSFA for the full list of scoring criteria), RPS assumes that those locations with medium access to employment would be deemed as falling within the 'upper half' of the Hansen score. This would seem reasonable given the number of local employers and employment centres within close proximity to Featherstone and to the site, as highlighted in Figure 5.2 of this submission.

6.49 On this basis, RPS contends that the SAPOP has wrongly applied the findings of the RSFA in light of Featherstone's accessibility to local employment. As a result, the SAPOP has wrongly scored the site as being in a location that is within the lower half of the Hansen score and thus has

‘unreasonable’ access to local employment. Accordingly, the Council should identify the correct effect consistent with the SA methodology. The correct score in RPS’ view, as defined in the methodology, is ‘minor positive’.

Summary of RPS appraisal – adjusted scores for Site 170

6.50 Based on the foregoing analysis, RPS has adjusted the SA findings for site 170. This is set out in the table below.

Table 6-2 RPS Sustainability Appraisal – Site 170

Site Reference 170	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Featherstone												
RPS	+/-	+	+/-	0	0		+	+	0	+	+	+
Post-mitigation	+/-	+	+/-	-	-	-	+	-	0	-	-	-
Pre-mitigation	+/-	-	-	-	-	-	+	-	-	-	-	-

6.51 In conclusion, once the proper appraisal has been applied to Site 170, it is clear that the site performs well in terms of its sustainability. The appraisal undertaken by RPS shows that the site performs particularly well in terms of economic and social-related objectives, but also is broadly neutral and / or positive against the range of environmental-related objectives as well.

6.52 The broadly positive outcome in terms of the site’s overall sustainability demonstrates that the site should be given greater consideration by the Council as a potential site allocation prior to issuing the SSLP at the publication stage.

7 RESPONSE ON SITE ASSESSMENT AND SELECTION

7.1 This section provides a response on Council's approach to site assessment and selection, with particular attention given to the assessment of 'Land east of Brookhouse Lane, Featherstone' (site 170), which is under the control of Persimmon Homes.

7.2 RPS notes that the consultation does not include a question on omission sites, and so provides a response to question 8, which is of most relevance to this issue.

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

7.3 Draft Policy SA5 lists the housing allocations identified to meet the district's housing target up to 2038. RPS notes that Land east of Brookhouse Lane, Featherstone' (site 170) has not been proposed for allocation under this policy. Paragraph 5.7 of the Preferred Options Document (POD) explains that the methodology for filtering site options and the assessments of allocated sites and reasonable alternatives can be found in the accompanying Housing Site Assessment Topic Paper. This is actually entitled the 'Housing Site Selection Topic Paper' (HSSTP). RPS provides a response to this document in the rest of this section.

Summary of Council's assessment of site 170

7.4 Paragraph 5.12.7 of the POD provides a summary of the reasons for not allocating any additional land at Featherstone, including site 170. The reasons given highlights site constraints, such as '*unmitigable major negative education effects in the SA*', '*initial highways concerns*' and '*significant heritage concerns*'. As a result, the Council suggest that '*no site is considered to perform so well as to change the Council's preferred spatial housing strategy*'.

7.5 The only constraint of relevance to site 170 highlighted above relates to highways. As explained below, an initial transport strategy prepared by PJA, on behalf of Persimmon Homes, outlines how these concerns can be mitigated in order to facilitate suitable development on the Site.

7.6 Appendix 3 of HSSTP provides the full details of the assessment of site 170. Under the 'summary conclusions' the HSSTP identifies three 'key positives and negatives' for the Site. These are:

- Lesser Green Belt harm than the majority of land around the village (site is 'moderate')
- Lower landscape sensitivity than the majority of land around the village (site is 'low-moderate')
- Highways Authority raise initial concerns with highways capacity in surrounding area

7.7 From this, the Council concludes that:

Conclusion

Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, SAD Site 168 and Site 397."

RPS response to the Council's assessment of site 170

Response on the conclusions

- 7.8 Having reviewed the HSSTP with respect to the sites assessed at Featherstone, including site 170, RPS disputes the conclusions of the Council's site assessment for site 170 and its exclusion from allocation in the POD.
- 7.9 Firstly, it is clear, on the Council's own evidence, that site 170 performs well in terms of Green Belt harm ('moderate') and Landscape sensitivity (low-moderate') compared to the other discounted Green Belt sites assessed at Featherstone. The harms identified in relation to these other sites (sites 169, 172, and 396, and 527 all score 'moderate-high for Green Belt harm) which sets these sites apart from site 170. Only site 169 scores similar for landscape sensitivity compared to site 170.
- 7.10 And secondly, RPS contends the highways concerns raised by the County Highways Authority (CHA) has been over-stated and result in an unduly negative assessment for the Site. The comments raised by the CHA are set out in Appendix 2 of the HSSTP, and as follows:
- "Initial concerns due to A460 capacity issues pre-M54/M6/M6 toll link road and connectivity to wider village"*
- 7.11 As mentioned above, Persimmon Homes commissioned PJA Consulting to undertake an initial transport appraisal of the Site. The details of this appraisal are provided in a Highway Access and Sustainable Transport Note prepared by PJA, dated April 2020, which is appended to this submission (Appendix B). The purpose of the appraisal was to consider the key transport issues and opportunities for the Site. Based on this analysis, a comprehensive transport strategy is presented which demonstrates that:
- Vehicular access to the site is deliverable from Brookhouse Lane;
 - Pedestrian and cycle connections can be provided to enable access to the site by sustainable modes and provide access to existing local facilities in Featherstone;
 - The site is accessible to regular public transport services;
 - The site is well located for travel to the key commuting destinations of Wolverhampton and Cannock and also to Junction 1 of the M54; and
 - A planned improvement scheme to provide a link road between the M54 and M6 will release capacity to accommodate new development.
- 7.12 Based on the initial findings from this appraisal, RPS disputes the CHA's view regarding concerns with the potential for connectivity to be achieved with the wider village and highway capacity in the surrounding area. It is clear that there is potential to deliver a transport strategy that can address the concerns identified by the CHA. RPS does not therefore consider that Site 170 should be discounted on highways grounds.
- 7.13 Based on the foregoing analysis, RPS does not agree with overall conclusions drawn by the Council in relation to site 170 which has resulted in its exclusion from the POD. RPS contends that the

assessment is unduly negative with respect to site 170, in particular with respect to highways concerns. On this basis, RPS suggests greater consideration should be given to the potential for site 170 to accommodate residential development should the Council identify the need for additional housing, in light of our response to question 5 set out in this submission.

Response to the 'site constraints' identified

- 7.14 The HSSTP for the Site includes a number of criteria to which RPS wishes to respond. These are addressed below.

Impact on historic environment

- 7.15 RPS notes that site 170 scores 'amber' with respect to potential for 'indirect' impacts upon the setting of nationally and locally designated heritage assets. This is based on information set out in Appendix 1 of the South Staffordshire Historic Environment Site Assessment 2020 (HESA). This report suggests the site is located 145 metres from a designated asset (Grade II listed Moseley Old Hall) and so any development on the Site would need to ensure its setting is protected. It is noted that this score indicates that there are no significant effects which cannot be mitigated through development on the Site, and thus does not represent a significant constraint that prevents the allocation of the Site for residential development. Nevertheless, the methodology set out in section 3 of the HESA main report does not define how distance is to be applied in defining the setting of heritage assets, and thus the potential impact on those assets. The assessment for site 170 in relation to setting is therefore arbitrary in nature and does not represent a robust assessment.
- 7.16 Furthermore, the illustrative masterplan set out in the Vision Document shows that built development would be significantly set back from the edge of the site, which would increase the 'stand-off' to c. 330 metres, more than double the Council's estimate. This needs to be taken into account by the Council as part of a revised assessment of impact on the historic environment.

Known site constraints

- 7.17 The HSSTP identifies a number of 'known constraints' relating to site 170. The assessment identifies that development on site 170 would appear to remove agricultural field. Whilst this may be so, national policy does not protect agricultural land for its own sake, and therefore loss of agricultural land is not a reason to preclude development on the Site and, therefore, should not be defined as being a constraint.
- 7.18 The HSSTP flags that the Site is located within a Minerals Safeguarding Area (MSA) and Coal Authority High Risk Area. Whilst these designations cover the Site, they do not of themselves preclude development from coming forward on the Site or prevent the Site from being allocated for residential development, given the MSA also covers the two allocated sites at Featherstone (site 168 and 397).
- 7.19 The HSSTP also highlights the presence of a 'large area of TPOs (Tree Preservation Order) 'in the centre of the site'. However, a simple review of aerial photographs clearly show the centre of the

Site as being open, consistent with its agricultural use. It is therefore disputed whether this is justifiable constraint applicable to the Site.

7.20 The HSSTP also highlights the need for a Flood Risk Assessment (FRA) as part of any future planning application. This is standard practice in line with national policy and does not preclude the allocation of the Site for residential development.

7.21 With regards to highways constraints, RPS has provided a response on this elsewhere in this submission.

7.22 Based on the foregoing analysis, whilst some constraints may impact on the Site, none of them preclude residential development on the Site, nor do they prevent the Site from being allocated in the local plan for residential use.

Site 'opportunities'

7.23 The HSSTP also identifies a number of opportunities that can be achieved on the Site. These are summarised as follows:

- Large site offers good permeability providing a greater opportunity for good scheme design.
- Opportunity to integrate site design with adjacent to area of open space.
- Adjacent to existing residential areas along northern boundary.
- Clearly defined boundaries including M54 to south and residential development to north.

7.24 The Vision Document, including the illustrative masterplan, for the Site (set out in Figure 1.1 of this submission) demonstrates how these opportunities can be achieved on the Site, particularly with respect to integrating the site into the village along its southern boundary. RPS therefore recommend that the Vision Document and illustrative masterplan are given greater consideration by the Council in the context of increasing the amount of land identified for development in the local plan.

7.25 Based on the analysis on the site assessment process set out above, RPS does not agree with overall conclusions drawn by the Council in relation to site 170 which has resulted in its exclusion from the POD. RPS contends that the assessment is unduly negative with respect to site 170, in particular with respect to highways concerns. Similarly, whilst some constraints may exist, none of them preclude residential development on the Site, nor do they prevent the Site from being allocated in the local plan for residential use.

7.26 On this basis, RPS suggests greater consideration should be given to the potential for site 170 to accommodate residential development should the Council identify the need for additional housing, in light of our response to question 5 set out in this submission

8 RESPONSE TO THE GREEN BELT (POLICY DS1)

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

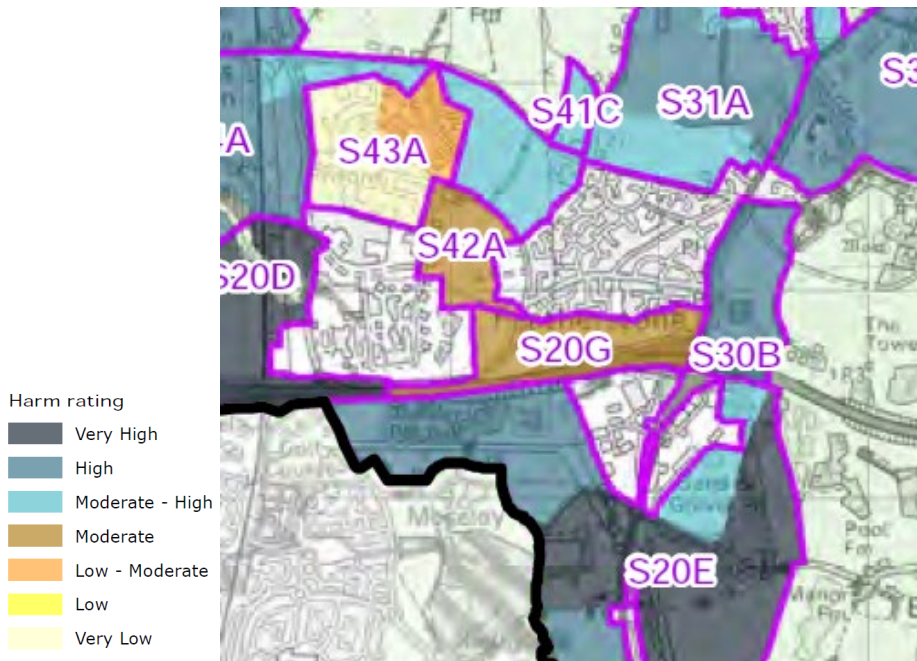
Exceptional Circumstances

- 8.1 Policy DS1 (Green Belt) proposes a number of boundary changes to the adopted Green Belt in the District to accommodate development allocations set out in Policies SA1, SA2, SA3, SA5, and SA7.
- 8.2 As part of the development strategy, paragraph 4.3 recognises that the release of Green Belt land is justified due to the limited potential to allocate land on brownfield sites and land located outside the Green Belt. In this context, in order to meet the future development needs of the District, Green Belt release is inevitable. RPS therefore agrees with the Council that the lack of other viable options to meeting the growth needs of the District, as well as helping neighbouring authorities in the Black Country to addressing their unmet housing need, are exceptional circumstances that justify the approach being taken in Green Belt as set out in Policy DS1.
- 8.3 Nonetheless, RPS considers that the Council can, and should, go further than its current proposals for altering the Green Belt. Representations set out elsewhere in this submission argue that the housing needs of the District could be higher than suggested by the Council, and that the contribution (currently 4,000 dwellings) towards the unmet needs across the wider-HMA should be revisited in light of the recent proposals published in August 2021 by the Black Country Authorities as part of its local plan review, which has established a scale level of unmet need far greater than previous estimates suggested when the 4,000 contribution was originally consulted by the Council on in 2018.
- 8.4 In this context, RPS suggest that additional land should be considered for release from the Green Belt in the District. As explained below, RPS contend that Land east of Brookhouse Lane (site 170) is an appropriate site to be released for this purpose.

Justification for releasing site 170

- 8.5 The commentary on the Green Belt considerations relevant to site 170 set out here is drawn from analysis set out in section 5 of the Vision Document appended to this submission.
- 8.6 The Council continues to rely on the Green Belt Study (GBS) 2019, prepared by LUC. The evidence is split into two parts; stage 1 and stage 2. In stage 1 of the GBS, the Site forms part of 'Parcel S20' which is a large tract of land between Wolverhampton, Walsall and Cheslyn Hay comprising 1,221 hectares of land. Parcels assessed in the study vary greatly in size, with several under 4 hectares in size i.e. smaller than the Site. In this scenario, the assessment of Parcel S20 against the Green Belt Purposes has limited value for the Site in terms of its contribution to the Green Belt.
- 8.7 Stage 2 of the Study sub-divides the parcels into smaller units and the Site is located within 'Parcel S20G' (see Figure 8.1 below).

Figure 8-1 South Staffordshire Green Belt Study 2019 – extract showing Parcel S20G



8.8 The Council's analysis for the sub-parcel states:

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

8.9 According to the Council's evidence, sub-Parcel S20G scores 'moderate' in terms of Green Belt harm should development take place on the parcel. The first point of note is that Appendix 3 of the GBS defines 'moderate' harm solely in relation to the sub-Parcel (within which site 170 form a part) but does not assess the harm specific to site 170. This is significant because sub-Parcel SG20, at 35.4 hectares (see Table 7.1 of the Appendix 3 of the GBS), is over twice the area of site (17.1 hectares according to Table 7.2 of the GBS), and is clearly much more closely related to the edge of the existing settlement than the larger sub-Parcel. However, the GBS applies the same 'moderate' harm to site 170 as it has to the sub-Parcel, despite the differences between the sub-Parcel and the Site.

8.10 Furthermore, the GBS does not take into account the emerging proposals for the Site set out in the illustrative masterplan in the Vision Document, which shows that a significant proportion of the Site will remain open and undeveloped as part of development. Notably, section 6 (page 38) of the document shows a net developable area of 4.86 hectares, which represents just 28% of the gross site area (17.1 hectares), or just 13.7% of the sub-Parcel. This represents a significant gap in the

Council's evidence base that should be revisited through an update to the GBS 2019 assessment to reflect the known assumptions relating to the Site highlighted here.

8.11 A site-specific Green Belt assessment has been undertaken on behalf of Persimmon Homes by Pleydell Smithyman Ltd (PSL) against the five purposes of Green Belt identified in paragraph 138 of the NPPF, set out in section 5 of the Vision Document (page 30-31). In summary,

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

- The Site would be well related to the existing settlement of Featherstone to the north. The Site is bounded to the west by East Road/ Featherstone Lane and to the west by Junction 1 of the M54 and the A460 which both represent strong defensible boundaries. The proposed spine road and associated planting would represent a **strong defensible and permanent Green Belt boundary**, which would not lead to unrestricted sprawl into the countryside.

Purpose 2: To prevent neighbouring towns merging into one another

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

Purpose 3: To assist in safeguarding the countryside from encroachment

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

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

- There are no historic towns to consider in this assessment.

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

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

8.12 This analysis demonstrates that the Site has a lower harm rating than that suggested by the Council. A lower harm rating would indicate that the release of the Site would not undermine the purposes of the wider Green Belt in this location. On this basis, exceptional circumstances exist to justify the

release of site 170 should it be required to meet the development requirements proposed in the local plan. As argued in this submission, RPS contend that additional growth is likely to be needed in the District, and that site 170 represents an appropriate location to accommodate this growth.

- 8.13 However, if the release of the Site from the Green Belt and allocation in the local plan for residential development is not deemed appropriate in this round of plan-making, then consideration should be given to safeguarding its release in future plans. This is considered briefly below.

Potential for safeguarding of the Site (Alternative approach)

- 8.14 Policy SA5 identifies two sites for allocation at Featherstone. One of these is Site 397 'Land adjacent to Brinsford Lodge, Brookhouse Lane. This site was identified as a 'Safeguarded Allocated Site' in the Site Allocations Document under Policy SAD3 of that plan. Site 397 was therefore previously part of the Green Belt before it was safeguarded.
- 8.15 However, once this site is allocated in the new local plan, there will be no other safeguarded residential sites identified at Featherstone. RPS contend that, in the context of an ever decreasing supply of non-Green Belt brownfield land, in order to provide for an orderly release of land to meet future needs beyond the new plan period (to 2038) the Council should take the opportunity to identify safeguarded land to replace site 397. The evidence presented in this submission shows that site 170 would cause the least harm to the wider Green Belt than any other Green Belt site option considered at Featherstone through this round of plan-making for the District.
- 8.16 On this basis, RPS contend that it would be logical to identify site 170 for safeguarding in this local plan ahead of the other site options at Featherstone.

9 RESPONSE TO THE INFRASTRUCTURE DELIVERY PLAN

Question 2:

(a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP?

(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?

9.1 The Council has published alongside the POD an updated version of the Infrastructure Delivery Plan (IDP), dated September 2021. Paragraph 1.1 of the IDP states that: *“The purpose of this Infrastructure Delivery Plan (IDP) is to identify what is needed to deliver planned growth sustainably, effectively and at the right time in South Staffordshire.”*

9.2 RPS has reviewed the content of the latest iteration of the IDP, and wishes to make the following observations, set out below.

Current Provision

Social infrastructure

9.3 Chapter 4 of the IDP lists the range of infrastructure in the District by different category (physical, social, and green). Under the section covering ‘health’ infrastructure, the IDP states (at page 10):

“All Tier 1 and 2 villages have GP practices. However, higher order health needs of residents, such as hospitals, are provided through facilities in neighbouring towns and cities.”

9.4 RPS wishes to point out that settlements outside Tier 1 and 2 also provide access for local people to health facilities, notably at Featherstone (which is identified as a Tier 3 settlement). Featherstone Family Health Centre, located off Old Lane, provides a range of healthcare services and clinics for patients, currently including two doctors, nurse, midwife, physiotherapist and podiatrist. Paragraph 1.3 of the IDP reiterates that the preferred strategy of the local plan is ‘infrastructure-led’ and that this strategy seeks to promote growth in locations that can, amongst other things, maximise existing infrastructure provision. It is important, therefore, that the IDP properly reflects the provision of infrastructure available within specific settlements, in this case in Featherstone, and does not overlook opportunities to support and maximise the future viability of infrastructure where it exists.

9.5 On this basis, RPS recommends that the Council amends the IDP to reflect this point and ensures that all potential opportunities to maximise that infrastructure are explored through the IDP process.

Infrastructure-led strategy

9.6 Chapter 5 of the IDP provides a commentary on emerging infrastructure opportunities and progress made to date on engagement with infrastructure providers.

Emerging infrastructure opportunities

- 9.7 Paragraphs 5.6-5.16 make reference to ten specific pieces of infrastructure that the Council claim: *"...will require further exploration as the plan progresses and will need to be subject to site specific viability assessment to confirm deliverability..."* (paragraph 5.6)"
- 9.8 Three of these are of relevance to this submission because they are to be delivered in close proximity to Featherstone settlement, in the vicinity of the Lane east of Brookhouse Lane site being promoted by Persimmon Homes. These are:
- Opportunities to develop new primary education facilities at the Cross Green urban extension.
 - Delivery of road option 7 to serve ROF Featherstone Strategic Employment site.
 - Brinsford Strategic rail-based Park and Ride.
- 9.9 The IDP (at paragraph 5.20) also refers to the emerging proposals for the M54/M6/M6 Toll/A460 link road, which will (in part) address highway capacity issues along the A460.
- 9.10 All these infrastructure projects represent significant opportunities to support future growth in and around Featherstone settlement, which the Council should be giving greater consideration to in terms of the overall provision of housing growth currently assigned to Featherstone. In line with comments set out earlier in this submission, taking into account such opportunities to support greater levels of growth at Featherstone would offer a more 'balanced' approach to the distribution of growth, rather than basing growth on the current provision of local facilities.

Work to date with infrastructure providers

- 9.11 The IDP provides a summary table (at Appendix A of the IDP) of the updated engagement with infrastructure and service providers, including the status of scheduled infrastructure projects and the scope of known deficiencies.
- 9.12 RPS notes that, in relation to proposals for the ROF Featherstone road scheme and for the Brinsford rail park and ride, neither scheme has any approved design, funding and business case in place at this time. RPS further notes that the schedule in the IDP makes no specific to the provision of a new primary school at the Cross Green strategic allocation.
- 9.13 These projects are critical to ensuring that the wider proposals for the Cross Green strategic allocation and the employment allocation at ROF Featherstone will deliver sustainable development in this part of the District. However, it is unclear at present how these pieces of major infrastructure will be delivered, nor is it clear what the timescale for their delivery will be. Given the local plan is at the draft stage, RPS would have expected more clarity on these projects to enable a view to be taken on their overall deliverability now, which will form a key part of the test of soundness once the plan is finally submitted for examination. Without sufficient clarification being provided, it will be difficult to determine that these proposals are deliverable and thus soundly-based.

- 9.14 In light of this uncertainty, RPS would recommend that greater consideration is given to identifying additional sites in the local plan to act as ‘contingency’ should the strategic allocations not come forward as anticipated, as well as to help safeguard land to meet longer-term needs. RPS consider this to be a logical and proportionate response to the current lack of clarity on the specific delivery timing and funding aspects of these infrastructure projects that are so important to delivering the wider proposals at, or in close proximity to, Featherstone. An ideal option to address these issues would be to give consideration to identifying Land East of Brookhouse Lane, Featherstone in the local plan.

10 CONCLUSIONS

10.1 These representations have been prepared on behalf of Persimmon Homes, with respect to their interests in the 'Land East of Brookhouse Lane, Featherstone' (site ref.170). The submission provides a response to a number of questions posed by the Council, with a particular focus on the development strategy, Sustainability Appraisal, and Infrastructure Delivery Plan, as well some aspects of the evidence base that supports the Preferred Options Document (POD).

10.2 Set out below is a summary of the conclusions drawn from the representations:

- It is acknowledged that the POD plans to accommodate all the local housing needs of South Staffordshire (c. 4,880 dwellings) as well as makes a contribution towards the unmet housing need from the wider housing market area (4,000 dwellings). However, the POD also plans to significantly over-allocate land for employment growth, but this does not appear to have been considered in determining the local housing need figure for the District. RPS recommends that the Council should assess the potential housing-related growth implications of an above-trend employment growth strategy, to ensure that sufficient homes are provided to meet that employment growth and so as not to encourage unsustainable commuting patterns.
- Related to this, it is acknowledged that the Council's development strategy is predicated on two broad factors. The first factor is based on distributing growth according to a settlements position in settlement hierarchy, which in turn is guided by the provision of local services in those settlements. The second factor is based on utilising the findings of the Strategic Growth Strategy prepared by GL Hearn in 2018, which identified a number of 'strategic locations' for growth in District, which have been taken forward in the POD. The representations here raise concerns that this two-pronged approach, whilst understood in principle, is under-estimating the growth potential at certain settlements, notably Featherstone, which offers the opportunity to balance the provision of housing in close proximity to locations (either new or existing) identified for employment growth. This would ensure that growth in homes and jobs can be delivered in a more 'balanced' way that can help to reduce the level of out-commuting, which the Council acknowledges is an issue (see paragraph 6.20 of the POD) and thus deliver more sustainable patterns of development in the District.
- In terms of the Sustainability Appraisal (SA), RPS has identified a number of issues in the findings of the appraisal with respect to Land East of Brookhouse Lane site. RPS considers that the Site performs better than is suggested by the Council and therefore underplays the potential of the Site in sustainability terms. These issue should be addressed as part of the next iteration of the SA.
- In relation to the site assessment and selection process applied to the Site, this submission has shown that, whilst some constraints may impact on the Site, none of them preclude residential development on the Site, nor do they prevent the Site from being allocated in the

local plan for residential use. On this basis, RPS does not agree with overall conclusions drawn by the Council in relation to site 170 which has resulted in its exclusion from the POD. RPS contends that the assessment is unduly negative with respect to site 170, in particular with respect to highways concerns. Similarly, whilst some constraints may impact on the Site, none of them preclude residential development on the Site, nor do they prevent the Site from being allocated in the local plan for residential use.

- Consequently, greater consideration should be given to the potential for site 170 to accommodate residential development should the Council identify the need for additional housing.
- With respect to Green Belt, RPS agrees with the Council that the lack of other viable options to meeting the growth needs of the District, as well as helping neighbouring authorities in the Black Country to addressing their unmet housing need, are exceptional circumstances that justify the approach being taken in Green Belt as set out in Policy DS1.
- Nonetheless, as argued in this submission, RPS considers that the Council can, and should, go further than its current proposals for altering the Green Belt, including giving greater consideration to the Land East of Brookhouse Lane (site 170). This submission has shown that releasing this Site would not cause significant harm to the wider purpose of the Green Belt in this part of the District.
- Alternatively, if it is not deemed appropriate to release the Site in this plan review, then consideration should be given to safeguarding the Site for release through the next review of the Local Plan.
- With respect to infrastructure delivery, this submission has identified a number of uncertainties regarding the delivery of certain pieces of infrastructure critical to overall delivery of the new Local Plan. In light of this uncertainty, RPS would recommend that greater consideration is given to identifying additional sites in the local plan to act as 'contingency' should the strategic allocations not come forward as anticipated, as well as to help safeguard land to meet longer-term needs. RPS consider this to be a logical and proportionate response to the current lack of clarity on the specific delivery timing and funding aspects of these infrastructure projects that are so important to delivering the wider proposals at, or in close proximity to, Featherstone. An ideal option to address these issues is the Land East of Brookhouse Lane, Featherstone being promoted by Persimmon Homes.

10.3 Persimmon Homes would welcome further engagement with the Council as the plan review moves forward, in light of the representations set out here.

Appendix A - Vision Document: Land East of Brookhouse Lane, Featherstone, January 2021



Land at Brookhouse Lane, Featherstone

Development Vision

January 2021





Persimmon Homes West Midlands
Wilkinson House
Stafford Park 1
Telford
TF3 3BD

www.persimmonhomes.com
01902 624343

Contact:
Alastair Stewart
alastair.stewart@persimmonhomes.com



RPS | Consulting UK & Ireland
321 Bradford Street
Birmingham, West Midlands,
B5 6ET



Figures

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

Contents

Executive Summary

1. Introduction.....	7
2. The Site and Surrounding Area.....	11
3. Site History.....	17
4. Planning Policy.....	21
5. Landscape and Green Belt Review.....	27
6. Is the Site Sustainable?.....	33
7. The Vision for the Site.....	43
8. Conclusions.....	49

Appendices

Appendix 1: Previous Appeal Decision

Appendix 2: Illustrative Masterplan

Appendix 3: Site Access Plan

Appendix 4: Landscape and Visual Appraisal and Green Belt Assessment (PSL Ltd)

Appendix 5: Preliminary Ecology Report (PSL Ltd)

Appendix 6: PJA Highway Access and Sustainable Transport Note



KEY:

- | | | | | |
|----------------------------|---|----------------------------------|--------------------------------------|--------------------------------|
| Site Boundary | Other uses, Commercial/Educational | Existing planting | Naturalistic play areas | Potential footpath/cycle route |
| Green space | Proposed residential Blocks | New planting | Potential MUGA (Multi Use Game Area) | Potential footpath route |
| Surrounding developed land | Potential residential buildings frontages | Watercourse and Attenuation pond | Wildflower Meadows | Vehicle access |

Document prepared by Pleydell Smithyman LTD.
 Reference: S:\M19.141 Brookhouse Lane, Featherstone\
 Models_Graphics\M19.141.M.002B Illustrative Masterplan

Figure 1: Illustrative Masterplan

Executive Summary

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

In summary:

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

1

1. Introduction



Figure 2: Aerial view of the site

1. Introduction

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

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

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

opportunity to meet with Officers from South Staffordshire Council in advance of that consultation.

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

This document:

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

2

2. The Site and Surrounding Area

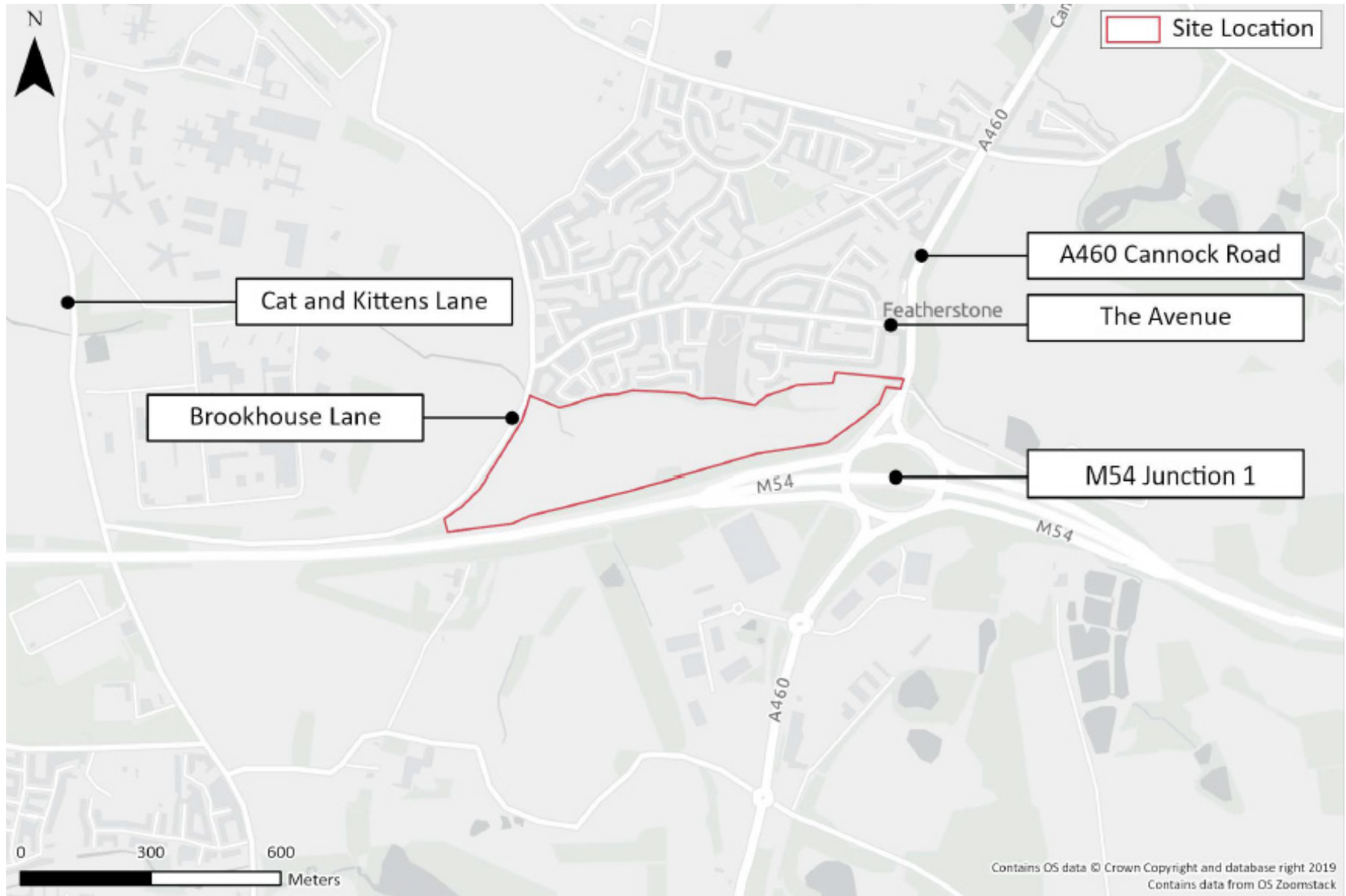


Figure 3: Strategic Site Location Plan

2. The Site and Surrounding Area

Site Context and Location

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

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

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

The Site and Surroundings

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

The full length of the southern boundary adjoins the M54 and M54 slip-road and comprises a belt of woodland planting, typically 40m in depth,

that has been planted on an earth embankment several metres above the carriageway and Site. The embankment and planting also follows the eastern boundary of the Site.

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



Figure 4: View of the site from the M54 Motorway



Figure 5: View towards northern site boundary



Figure 6: View from Brookhouse Lane



Figure 7: View from Brookhouse Lane



Figure 8: Embankment to Eastern boundary of the site



Figure 9: Existing dwellings to the North of the Site

3

3. Site History



3. The Site History

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

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

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

In reference to landscape impact the SoS agreed with the Inspector (at ¶27) that the site is very well contained within firmly defined boundaries and that the scheme would not have a materially harmful effect on the

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

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

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

4

4. Planning Policy

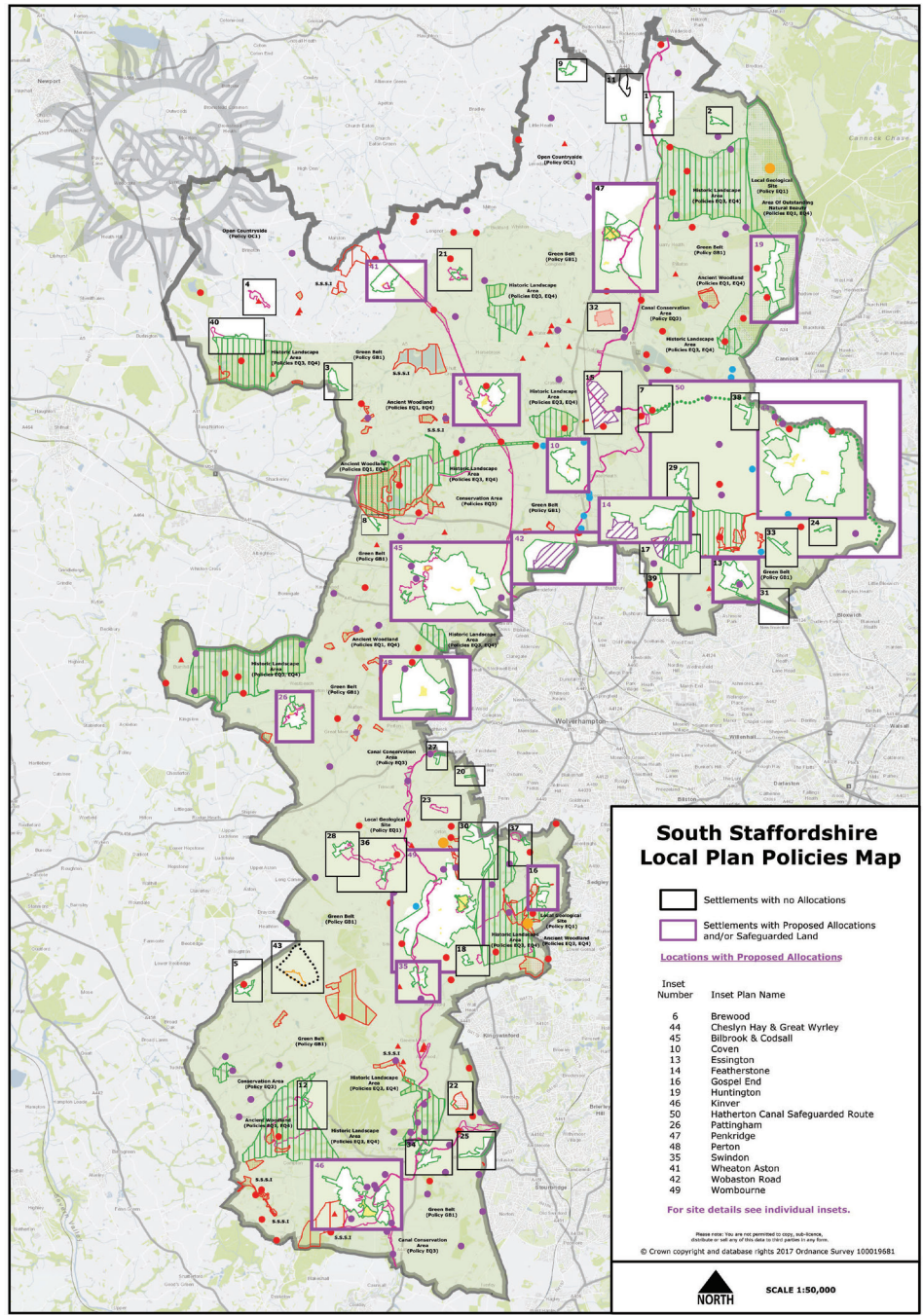


Figure 10: Local Plan Policies Map (District)

4. Planning Policy

Adopted Development Plan

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

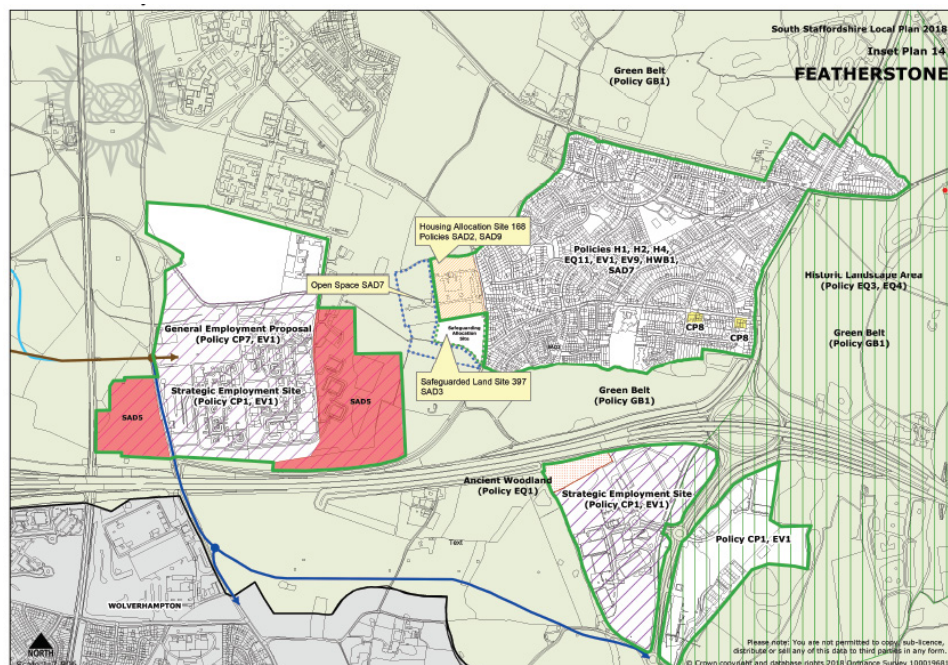


Figure 11: Local Plan Policies Map (Featherstone Inset)

The site is within the Green Belt and adjoins the southern edge of the village of Featherstone, which is designated as a Local Service Village in the Core Strategy. Within these villages limited development

will be supported 'where it meets local needs, whilst recognising the constraints that impact upon the District'.

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

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

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

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

Local Plan Review

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

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

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

The 'Spatial Housing Strategy & Infrastructure Delivery' document considers responses to the Issues and Options consultation, and the locally prepared evidence base, including Green Belt and Landscape Studies, and contains seven Spatial Housing Options. These options include keeping Green Belt release to a minimum and utilising Green Belt land where development would be least harmful. They also

consider locating development in villages with the highest affordability issues, and where there were higher levels of local need. The options also consider those areas highlighted in the Greater Birmingham Housing Market Area Growth Study.

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



4. Planning Policy

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

National Planning Policy

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

The ‘Spatial Housing Strategy & Infrastructure Delivery’ document states that the new Local Plan will deliver 8,845 new homes over the plan period and that only 3,861 dwellings can be provided without any further release of Open Countryside and Green Belt land. Almost all Spatial Options (including the Council’s preferred option) will involve the release of Green Belt land.

It is clear that the Council concludes that the exceptional circumstances that should exist to justify changes to Green Belt boundaries, as set out in ¶137, are in place and that the Local Plan Review will need to amend the Green Belt boundary within South Staffordshire to accommodate the housing need for the district, and a proportion of the unmet need in the wider region.

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

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

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

5

5. Landscape and Green Belt Review

5. Landscape and Green Belt Review

Site Context and Location

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

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

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

The Landscape Sensitivity Review prepared by South Staffordshire Council in 2015 identified the Site as having a Low sensitivity to new housing, noting that all other land surrounding the settlement of Featherstone was rated at a Medium or High sensitivity. The study

states that the Site is “Well-screened from M54 by well-vegetated embankment. Urban influences form settlement edge and therefore relates well to the urban area. Development would be a logical extension to the settlement”.

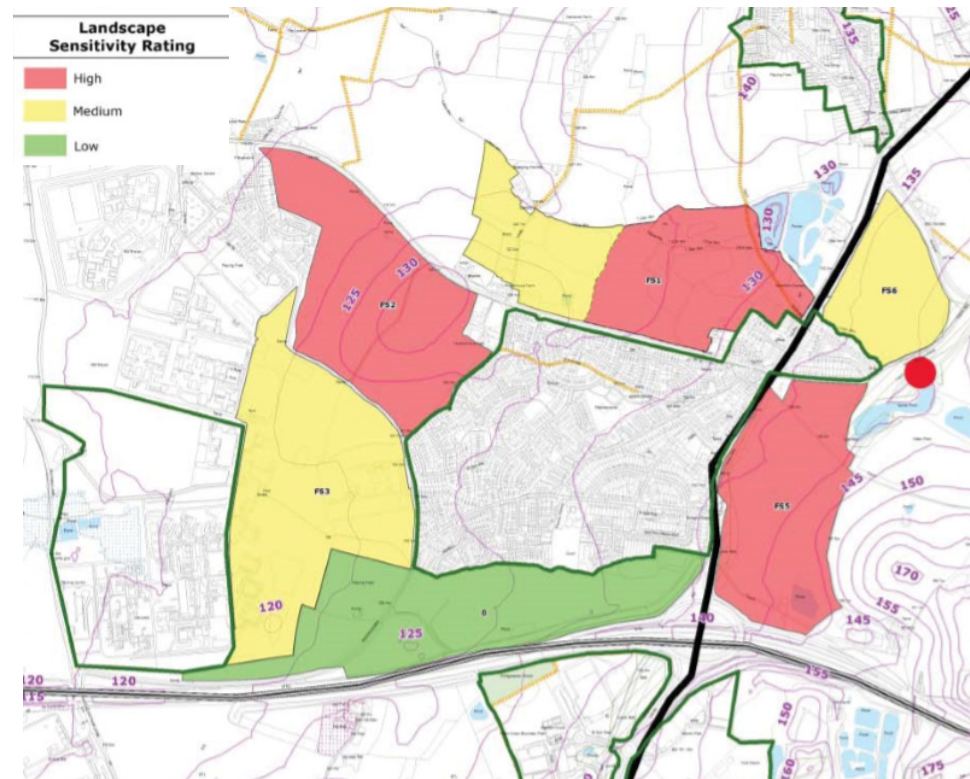


Figure 12: 2015 Landscape Sensitivity Review extract

As part of the evidence base for the Local Plan Review an updated Landscape Sensitivity Assessment was published in 2019. The Site forms part of Parcel SL51, which also includes land beyond the Site boundary, most notably to the west of Brookhouse Lane.

The Site is assessed as having a Low-Moderate landscape sensitivity (see Plate 4). The landscape sensitivity judgement for the parcel states: *'The landscape is considered to have a low-moderate overall sensitivity to residential and/or employment development due to its weak natural character and visual enclosure and the significantly impact of its proximity to modern large scale development'*

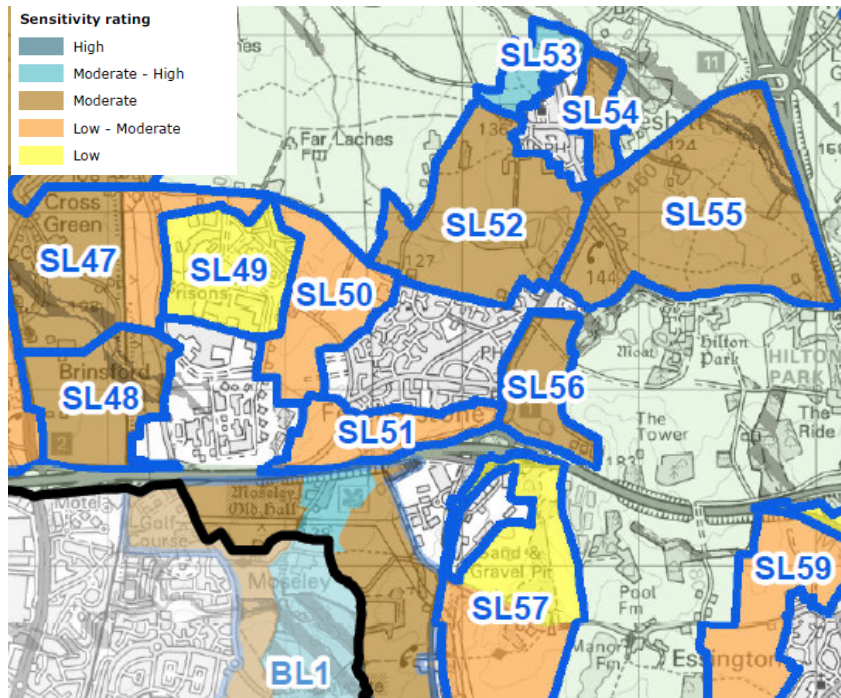


Figure 13: 2019 Landscape Sensitivity Assessment extract

A Landscape and Visual Appraisal has been undertaken by Pleydell Smithyman to consider the landscape impact of the development of the site and this concludes that the overall rating for the Site should be Low and not Low-Moderate which accords with the Landscape Sensitivity

Review undertaken by South Staffordshire Council in 2015.

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

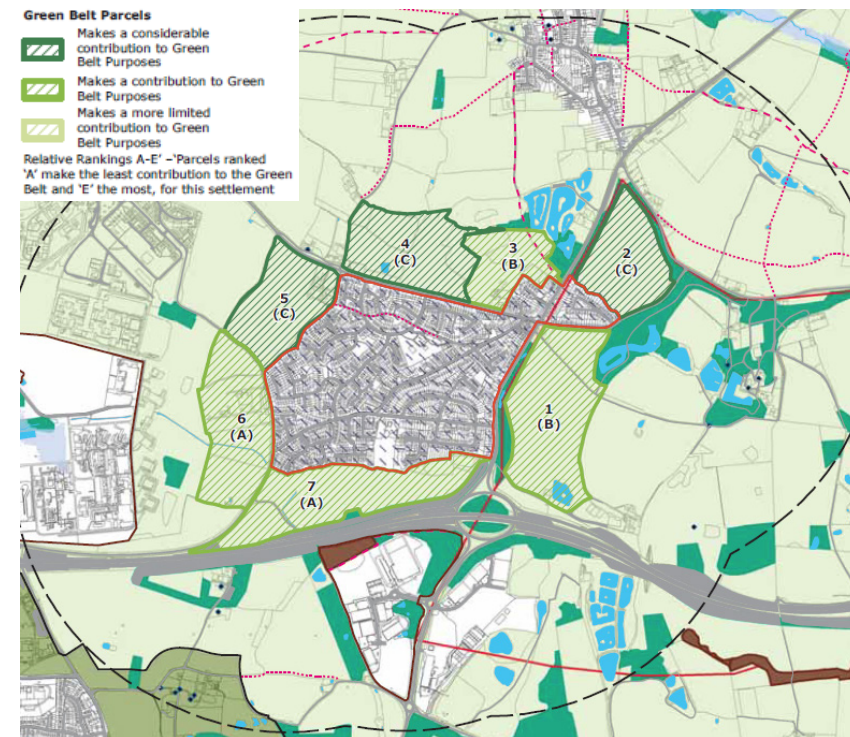


Figure 14: Partial Green Belt Review Method Statement extract

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

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

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

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

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

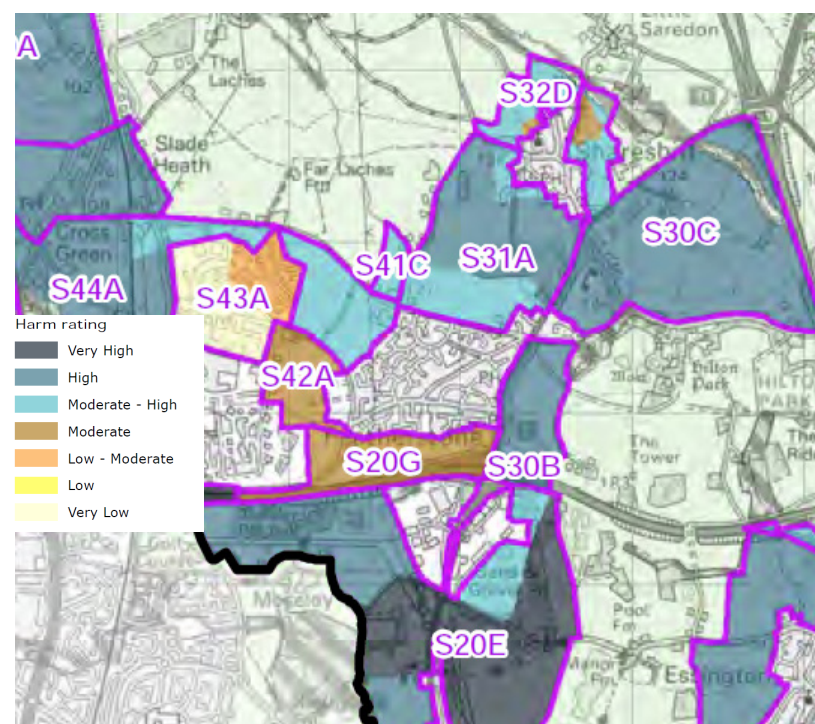


Figure 15: 2019 Green Belt Study extract

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

¶133 of the NPPF states that the essential character of Green Belts is their openness and their permanence, with the fundamental aim of preventing urban sprawl and ¶134 sets out the five purposes which Green Belt should serve. The PSL LVA and Green Belt Assessment

undertakes a detailed assessment of the site against those five purposes that can be summarised as follows:

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

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

Purpose 2: To prevent neighbouring towns merging into one another

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

Purpose 3: To assist in safeguarding the countryside from encroachment

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

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

There are no historic towns to consider in this assessment.

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

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

Accessibility Improvements

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

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

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

6

6. Is the Site Sustainable?



Figure 16: Local Facilities Plan

6. Is the Site Sustainable?

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

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

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

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

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

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

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

Technical Assessments

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

Transport and Access

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

South of the site, the road becomes more rural in nature, and the speed limit increases to the national speed limit (60mph).

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

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

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

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

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

The nearest railway stations to the site are Wolverhampton (approximately 8.1km) and Landywood (approximately 7.1km). Landywood Railway Station is served by two trains per hour (Monday

to Saturday) in each direction between Birmingham New Street and Rugeley Trent Valley. Wolverhampton Railway Station is served by regular services to a range of local, regional, and national destinations. The station can be accessed by the number 70 bus service from the site.



Figure 17: Public Transport Provision Plan

- The site benefits from being near the strategic road network, and key routes towards Wolverhampton and Cannock,
- Safe and suitable vehicular access to the site can be delivered from Brookhouse Lane, without the need for third party land,
- A pedestrian and cycle access strategy will maximise links to existing local facilities in Featherstone,

- The site can be made even more accessible by public transport through diversion of an existing bus service, or provision of additional pedestrian and cycle links onto Brookhouse Lane and A460 Cannock Road, and
- The proposals to provide a direct link between M54 and M6 will reduce traffic levels on the A460 within the vicinity of the site. This will provide a more attractive walking and cycling route for residents, alter the route of existing local bus services, and also change the likely trip distribution for the development traffic to access Wolverhampton and the wider strategic road network.

Landscape and Visual Impact

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

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

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

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

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

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

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

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

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

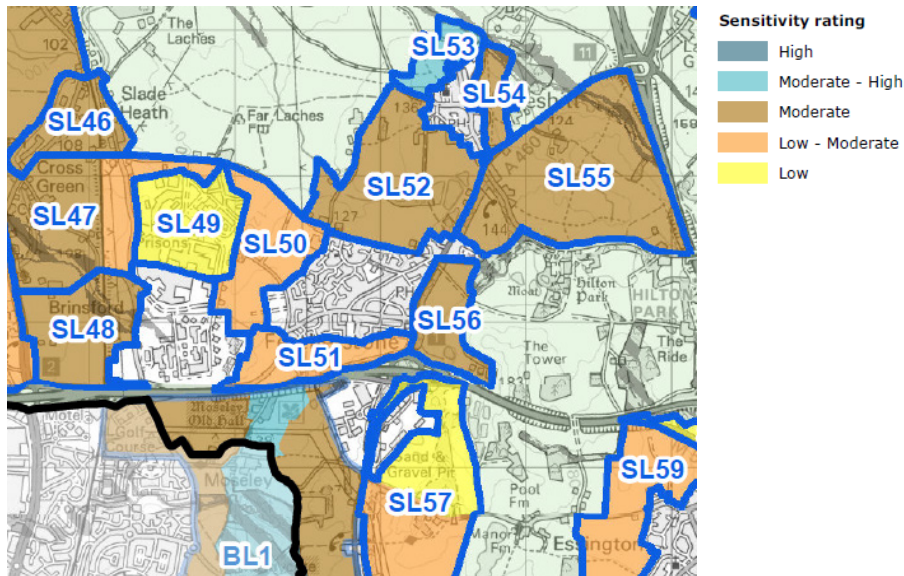


Figure 18: Landscape Sensitivity Plan

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

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

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

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

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

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

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

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

Ecology

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

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

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

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

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

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

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

Flood Risk

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

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

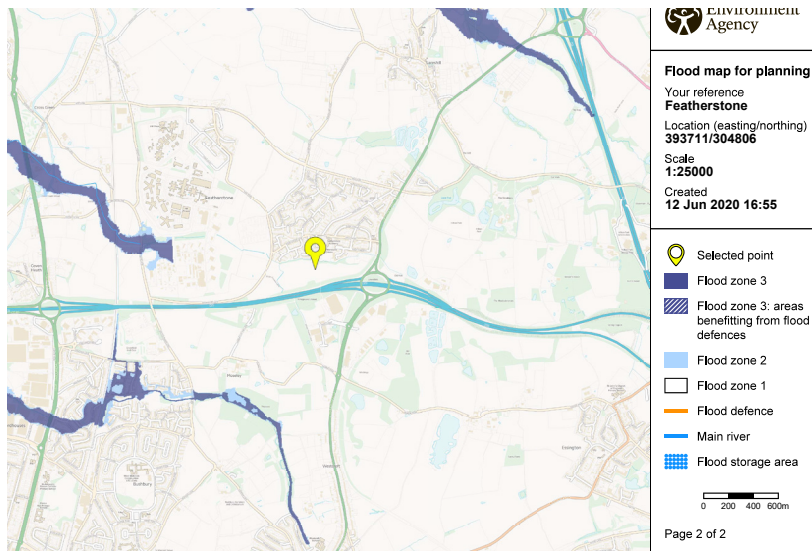


Figure 19: EA Flood Risk Plan

Noise

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

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

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



7

7. What is the Vision?



7. What is the Vision?

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

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

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

Approach

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

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

Site Constraints and Opportunities

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

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

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

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

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

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



Illustrative Masterplan

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

Access

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

Layout

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

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

Scale and Design

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

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

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

Landscape and Drainage

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

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

Phasing / delivery timings

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



8. Conclusion



8. Conclusion

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

Available now

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

Suitable

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

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

Achievable

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

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

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



 **Persimmon**
Together, we make a home.

Appendix B - Highway Access and Sustainable Transport Note prepared by PJA, dated April 2020

Persimmon Homes West Midlands
Brookhouse Lane, Featherstone
Highway Access and Sustainable Transport Note

April 2020

Project Code: 04832

DRAFT

DRAFT



Version Control and Approval

Version	Date	Main Contributor	Issued by	Approved by
A – Draft for Client	20 April 2020	JO	JW	CS

Prepared for

Alastair Stewart

Persimmon Homes West Midlands

DRAFT

DRAFT



Contents

Section	Page
I Introduction	I
1.1 Overview	1
1.2 Report Purpose and Structure	1
2 Baseline Conditions	3
2.1 Local Facilities	3
2.2 Local Highway Network	4
2.3 Sustainable Transport	5
3 Transport Strategy	9
3.1 Constraints and Opportunities	9
3.2 Vehicular Access	9
3.3 Pedestrian/Cycle Access	9
3.4 Public Transport Strategy	11
3.5 Highway Infrastructure	12
4 Summary	13



Appendices

Appendix A	M54 to M6 Link – General Arrangement Plans.....	15
Appendix B	Cycle Map.....	16
Appendix C	Trip Generation, Distribution and Assignment Assessment.....	17
Appendix D	Site Access Drawing.....	22
Appendix E	TRICS outputs - residential.....	23

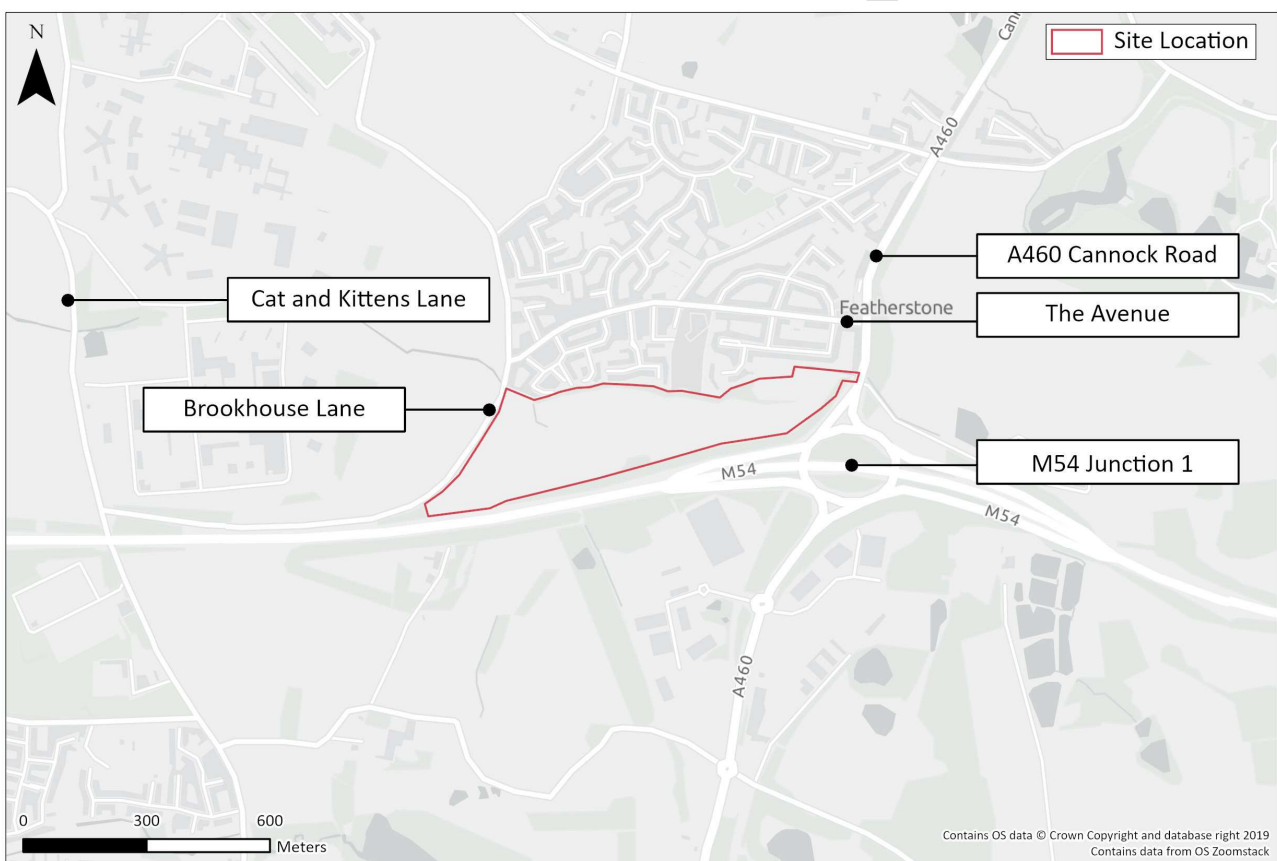
DRAFT

I Introduction

I.1 Overview

- 1.1.1 PJA have been commissioned by Persimmon Homes West Midlands to provide transport services in relation to promotion of a site on Brookhouse Lane, Featherstone to the review of the South Staffordshire Local Plan. The site can accommodate 150 dwellings and is shown in Figure 1-1.

Figure 1-1: Site Location



I.2 Report Purpose

- 1.2.1 This desktop appraisal considers the key transport issues and opportunities. Based on this analysis, a comprehensive transport strategy is presented which demonstrates that:

- Vehicular access to the site is deliverable from Brookhouse Lane;
- Pedestrian and cycle connections can be provided to enable access to the site by sustainable modes and provide access to existing local facilities in Featherstone;
- The site is accessible to regular public transport services;



- The site is well located for travel to the key commuting destinations of Wolverhampton and Cannock and also to Junction 1 of the M54; and
- A planned improvement scheme to provide a link road between the M54 and M6 will release capacity to accommodate new development.

DRAFT

2 Baseline Conditions

2.1 Local Facilities

2.1.1 Figure 2-1 shows the location of the nearest local facilities in terms of retail, education, open space, and health.

Figure 2-1: Local Facilities (education, health, and retail)



2.1.2 There are a number of local facilities in the locality of the proposed development. Using a point on Brookhouse Lane at the north-western extent of the site boundary and on A460 to the north-eastern extent of the site boundary as a starting point, Table 2-1 summarises the walking and cycling distances to these facilities (stating the shortest distance). It should be noted that this does not account for the distance walked within the site to reach the access point.

**Table 2-1: Access to Local Facilities**

Type	Name	Distance from site access point	Approximate walking journey time (minutes)	Approximate cycling journey time ¹ (minutes)
Healthcare	Featherstone Family Health Centre	750m (A460 Cannock Road)	9 minutes	4 minutes
Retail	Featherstone Post Office/Convenience Store	150m (A460 Cannock Road)	2 minutes	1 minute
	Costcutter	300m (A460 Cannock Road)	4 minutes	1 minute
	Londis	350m (A460 Cannock Road)	4 minutes	1 minute
Education	Featherstone Academy	550m (Brookhouse Lane / A460 Cannock Road)	7 minutes	2 minutes

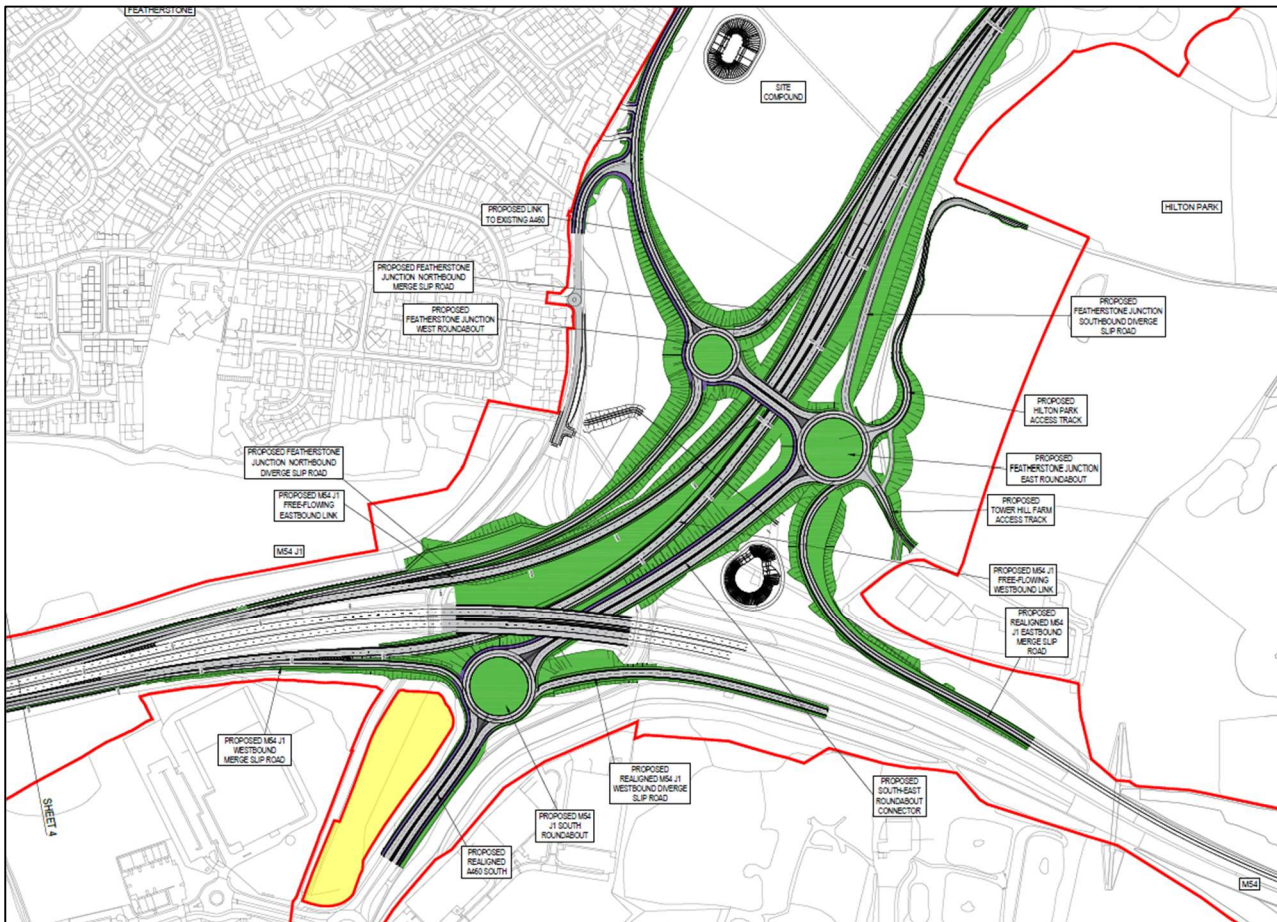
2.2 Local Highway Network

- 2.2.1 The site, presented in Figure 1-1 is bounded by Brookhouse Lane to the west, A460 to the east, M54 to the south, and existing residential properties to the north.
- 2.2.2 Brookhouse Lane is a single carriageway road which runs east-west providing access to surrounding residential areas, local facilities and A460 to the east. Between its junctions with East Lane and The Avenue, Brookhouse Lane has a speed limit of 30mph, with traffic calming in the form of speed cushions outside Featherstone Academy. South of the site, the road becomes more rural in nature, and the speed limit increases to the national speed limit (60mph).
- 2.2.3 A460 is a single carriageway road which runs north-south to the east of the development site. To the south, it provides access towards Wolverhampton and M54 Junction 1, and to the north, it provides access to Cannock. Within the vicinity of the site it has a speed limit of 30mph. The A460 is currently the only direct link between M54 and M6. As a result, it experiences high traffic volumes and severe congestion during network peak periods.
- 2.2.4 The M54 runs parallel to the southern site boundary, providing access to the M6 to the east and Telford to the west. Highways England have identified a scheme to provide an improved link road between M54 junction 1 and M6 junction 11. A Development Consent Order (DCO) for the preferred scheme was submitted to the Planning Inspectorate on 30 January 2020, with a decision anticipated in 2021 with completion of the scheme in 2024². General arrangement plans for the areas surrounding the site are provided in Figure 2-2, with full drawings provided in **Appendix A**.

¹ A cycling speed of 4.4m/s has been taken from the Sustrans Information Sheet FF11 or 'Cycle Friendly Employers' Information Sheet' and states that "a five mile journey can be comfortably cycled by an adult in 30 minutes".

² <https://highwaysengland.co.uk/projects/m54-to-m6-link-road>

Figure 2-2: M54 junction 1 and M6 junction 11 proposals



2.2.5 The scheme would re-route the A460 within the vicinity of the site, stopping up the A460 south of its junction with The Avenue. As a result of the scheme there would be a significant reduction in traffic volumes on the A460, reducing congestion and making it a more attractive route for pedestrians and cyclists.

2.3 Sustainable Transport

Walking and Cycling

2.3.1 Brookhouse Lane, A460 Cannock Road, The Avenue and Hilton Road provide footways on at least one side of the carriageway. There is no footway or crossing facilities provided along the site frontage onto Brookhouse Lane. The roads are subject to 30mph speed limits and street lighting is provided.



2.3.2 Based on the South Staffordshire Cycle Map³, Brookhouse Lane and East Road both form advisory cycle routes, as part of a network of local routes between surrounding settlements such as Snareshill, Cheslyn Hay, Great Wyrley and Coven as well providing connections towards Cannock to the north, and Wolverhampton to the south. To the south of the site, a shared footway/cycleway is provided on the eastbound side of Brookhouse Lane until the junction with Cat and Kitten Lane. A copy of this map is provided in **Appendix B**.

Public Transport

Bus

2.3.3 Figure 2-3 shows the nearest bus stops to the development site and the routes serving these stops. Table 2-2 provides a summary of these services. The number 67 bus service routes along Brookhouse Lane but does not stop in the vicinity of the site .

2.3.4 The 70 bus route provides an hourly service between Cannock and Wolverhampton. The M54 – M6 link road scheme is likely to require a diversion of this route although details of any changes have yet to be confirmed.

DRAFT

³ <https://www.staffordshire.gov.uk/Transport/cycling/Documents/Cycling-in-South-Staffordshire-Issue-4.pdf>

Figure 2-3: Public transport provision

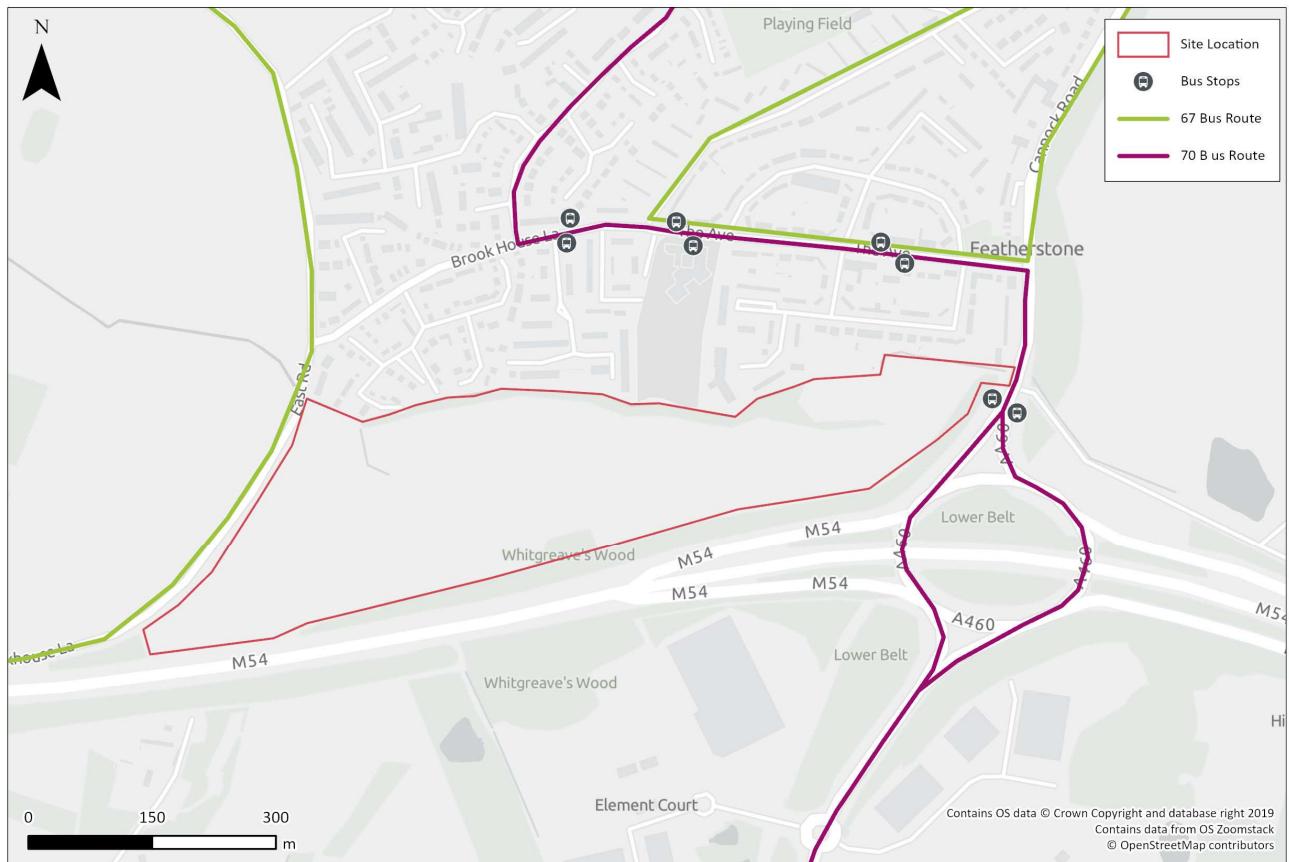


Table 2-2: Bus Service Provision

Service	Route	Operator	Direction	Weekday Service			Saturday Service		
				First	Last	Frequency	First	Last	Frequency
67	Cannock to Wolverhampton Via Dunstall, Low Hill and Featherstone	Select Bus Services	Towards Wolverhampton	09:11	16:55	Every 1- 2 hours	No service		
			Towards Cannock	08:10	14:41				
70	Cannock to Wolverhampton Via Longford, Cheslyn Hay and Featherstone	Arriva	Towards Wolverhampton	08:08	18:13	Hourly	08:08	18:13	Hourly
			Towards Cannock	08:04	18:02		08:04	18:02	
71A	Cannock to Wolverhampton Via Longford, Cheslyn Hay, Featherstone, Essington and Wednesfield	Arriva	Towards Wolverhampton	15:42		One service per day in each direction (School Days Only)	No service		
			Towards Cannock	08:15					



Rail

- 2.3.5 The nearest railway stations to the site are Wolverhampton (approximately 8.1km) and Landywood (approximately 7.1km).
- 2.3.6 Landywood Railway Station is served by two trains per hour (Monday to Saturday) in each direction between Birmingham New Street and Rugeley Trent Valley. No cycle parking is available at the station. A free car park with 26 spaces is available at the station.
- 2.3.7 Wolverhampton Railway Station is served by regular services to a range of local, regional, and national destinations. The station provides 86 cycle parking spaces and 832 car parking spaces and can be accessed by the number 70 bus service from the site.

DRAFT

3 Transport Strategy

3.1 Constraints and Opportunities

3.1.1 A comprehensive transport strategy has been developed based on the baseline conditions and the following key opportunities:

- The Highways England scheme to provide a direct link between M54 and M6 is likely to reduce traffic levels, congestion, and delay on the local highway network during peak periods and will also create a more attractive environment for pedestrians and cyclists on A460 Cannock Road;
- The site is within convenient walking and cycling distance of local facilities in Featherstone; and
- There are a number of bus routes operating within close proximity of the site, providing an opportunity for diversion of existing services or creation of new services to accommodate existing demand.

3.1.2 The development transport strategy has also been prepared with regard to the following constraints;

- The lack of footway or crossing facilities on Brookhouse Lane along the site frontage; and
- Congestion on the A460 corridor.

3.2 Vehicular Access

3.2.1 The vehicle access strategy has been prepared based on an initial assessment of trip generation, distribution and assignment, details of which are provided in **Appendix C**. Census data demonstrates that the majority of trips to/from the site would travel towards Wolverhampton and Cannock.

3.2.2 Access to the site would be provided from a priority junction onto Brookhouse Lane as shown in Drawing 04832-SK-0001-P01 contained within **Appendix D**. This junction can achieve required visibility splays based on posted speed limits (30mph).

3.2.3 It is recommended that observed speed data (85th percentile) is collected prior to submission of a planning application for the site, to inform visibility splays. The speeds in this location may be greater than the posted speed limit (30mph), however as the road is relatively straight and flat in nature, no issues with providing required visibility splays for higher measured speeds are foreseen. The site's extensive frontage onto Brookhouse Lane provides flexibility to accommodate any changes to the access design and longer visibility splays if required.

3.3 Pedestrian/Cycle Access

3.3.1 There are multiple opportunities to maximise access to the site for pedestrians and cyclists. Opportunities are summarised in Figure 3-1, and as follows:



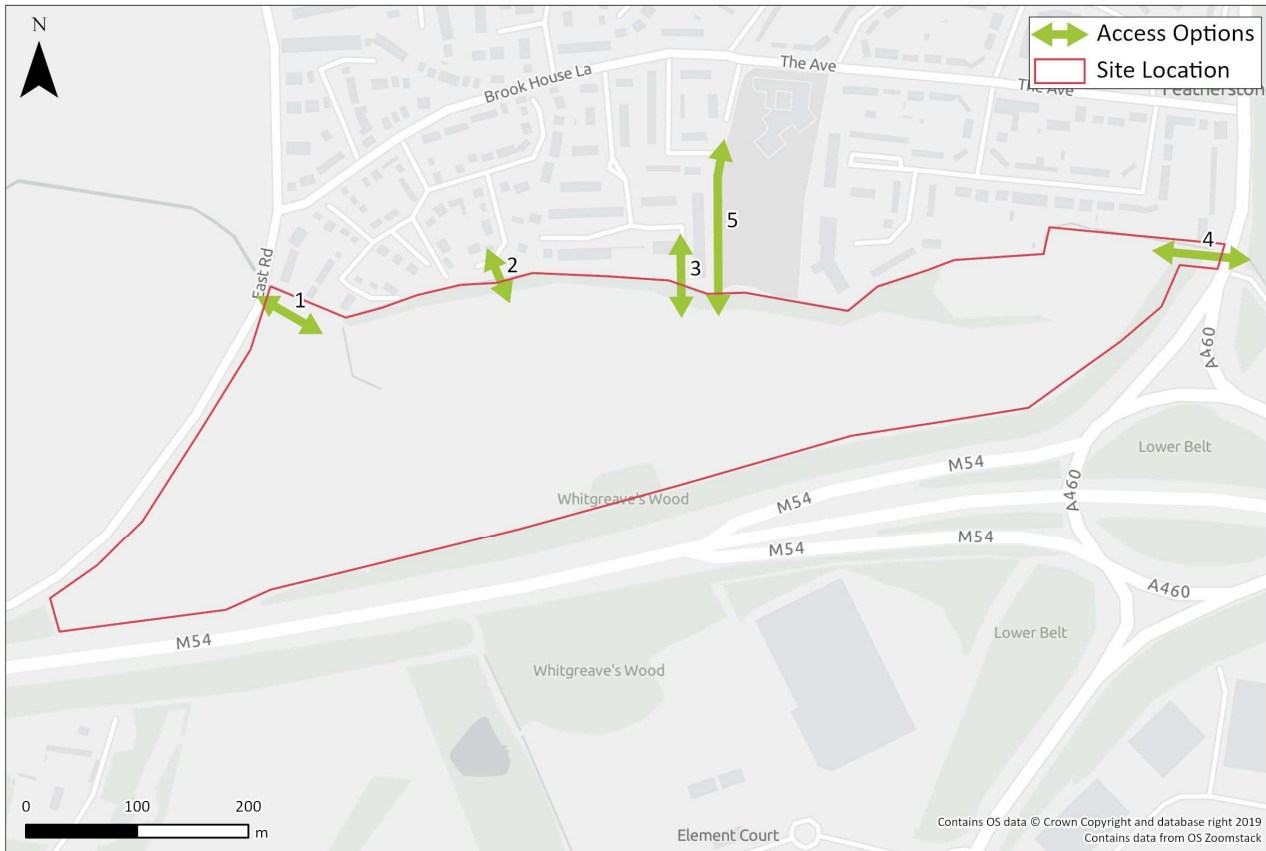
- **Option 1** – Extension of existing footway on Brookhouse Lane into the site, either within the site boundary, or adjacent to carriageway;
- **Option 2** – Provision of a link for pedestrians and cyclists onto Whilmot Close;
- **Option 3** – Provision of a link for pedestrians and cyclists onto Brookhouse Close;
- **Option 4** - Provision of a link for pedestrians and cyclists onto A460 Cannock Road; and
- **Option 5** – Provision of a link for pedestrians and cyclists onto Whitgreave Avenue adjacent to school playing fields.

3.3.2 At a minimum, it is recommended that Option 1 and 4 are provided. Provision of at least one of option 2, 3 or 5 would improve accessibility to local facilities in the centre of Featherstone. However, the feasibility of providing these links would be dependent on land ownership and the extent of land within the highway boundary. Providing a pedestrian access adjacent to the vehicular site access, and extension of the existing footway along the frontage of the site may result in loss or translocation of the existing hedgerow along Brookhouse Lane.

3.3.3 Options 1 and 4 are wholly deliverable within control of the landowner. In the event that the other options could not be provided, the site would remain within acceptable walking and cycling distance of local facilities.

DRAFT

Figure 3-1: Access options for pedestrians and cyclists



3.4 Public Transport Strategy

3.4.1 It is considered that there are two options to improve access to/from the site by public transport:

- **Option 1** – Re-route existing services through the site; and
- **Option 2** – Maximise pedestrian access to existing bus stops.

Option 1

3.4.2 One option to improve access by public transport is to re-route existing bus services through the site.

3.4.3 The number 70 bus service provides the most regular and frequent bus service within the vicinity of the site, however, only 7-8 minutes of layover time is provided at either end of the route. The Highways England scheme to provide a direct link between M54 and M6, once completed, is likely to considerably reduce congestion on a large proportion of this bus route, therefore reducing journey times during peak periods. This could provide some additional time within the existing timetable to extend the loop of this bus route through Featherstone, to include routing through the site. This would either require a loop within the site, or a bus only link onto the A460 on the eastern



boundary of the site. It is considered that the extension of this route would only be feasible once the M54/M6 works had been completed, and further discussion with SCC and the bus operator would be required.

Option 2

3.4.4 A second option to improve access by public transport is to provide high quality pedestrian routes to existing bus stops. The Highways England scheme to provide a direct link between M54 and M6 is likely to result in the existing stops on A460 Cannock Road being re-located. Therefore, it is considered that routes to the existing bus stops on Brookhouse Road and The Avenue should be maximised.

3.4.5 The approximate distance from access point (1) and (2), shown in Figure 3-1, to the nearest bus stop is approximately 410m, for (3) and (4) it is approximately 250m and it is approximately 300m for access point (5) It is therefore considered that in terms of facilitating access to public transport either access point 3,4 or 5 is provided to ensure that the majority of the development is within 400m of an existing bus stop with a regular service. As previously mentioned, the feasibility of providing these links would be dependent on land ownership and the extent of land within the highway boundary.

Summary

3.4.6 It is considered that option 1, to re-route existing bus services through the site would be the preferential option to maximise use of public transport by residents. Further discussion with SCC and public transport operators would be required to assess the feasibility of this.

3.5 Highway Infrastructure

3.5.1 The A460 is currently the only direct link between M54 and M6. It is understood that as a result it experiences high traffic volumes and severe congestion during network peak periods within the vicinity of the site. The Highways England scheme to provide a direct link between M54 junction 1 and M6 junction 11, re-routing the A460 within the vicinity of the site, is forecast to significantly relieve congestion on this corridor during peak periods and provide headroom to accommodate new development.

3.5.2 This is also likely to affect the distribution of traffic from the development, encouraging more vehicles travelling towards Wolverhampton to use the A460 rather than Cat and Kittens Lane. Vehicles from the development travelling on the M6 north are also likely to use M54 junction 1 and the direct link road, rather than M6 Junction 11.



4 Summary

4.1.1 PJA have been commissioned by Persimmon Homes West Midlands to provide transport services in relation to promotion of a site on Brookhouse Lane, Featherstone to the South Staffordshire Local Plan Review.

4.1.2 This appraisal demonstrates that the proposed site allocation is suitable for development as part of a comprehensive masterplan in that:

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



DRAFT

Appendix A M54 to M6 Link – General Arrangement Plans

DRAFT



Appendix B Cycle Map

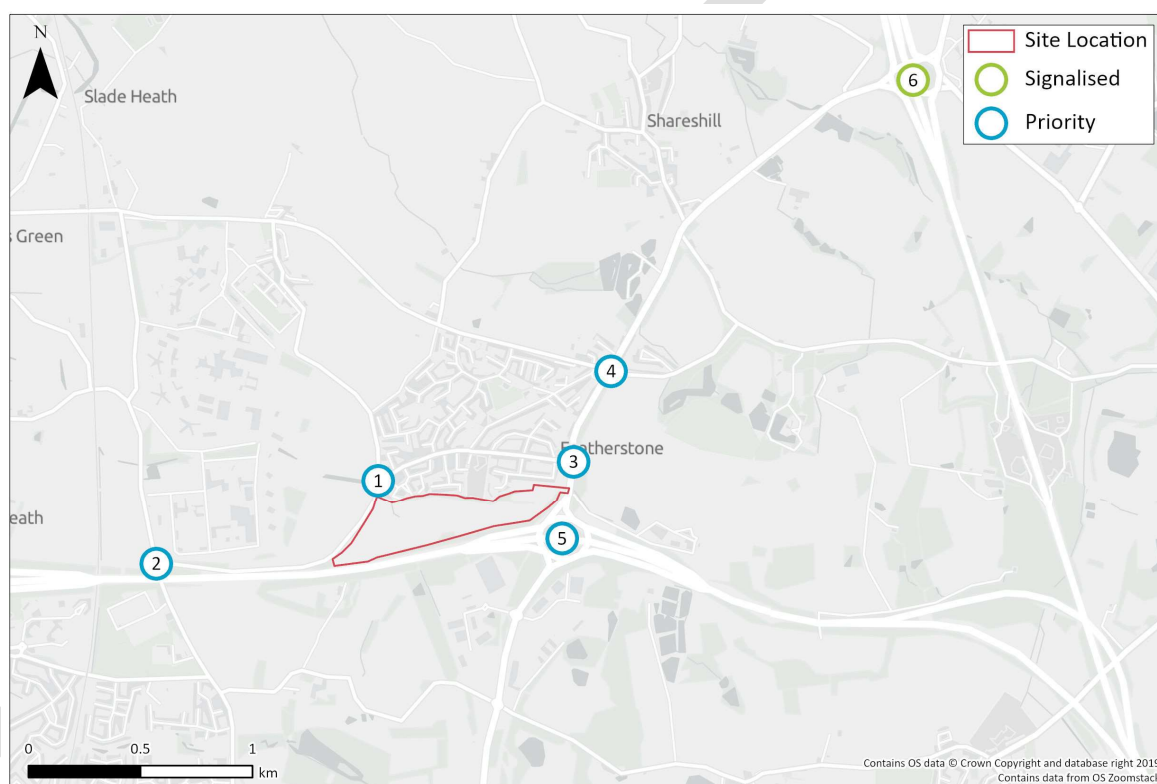
DRAFT

Appendix C Trip Generation, Distribution and Assignment Assessment

Introduction

4.1.3 This section of the report sets out the likely vehicle trip generation, distribution, and assignment for the site, as well as the impact this may have on the local highway network. The study area for the assessment is shown in Figure 4-1.

Figure 4-1: Study Area



Trip Generation

4.1.4 To calculate the travel demand for the site, person trip rates have been extracted from the TRICs database (v7.7.1). The following criteria were applied to the TRICs category “Residential – Houses Privately Owned”:

- **Site Location** – Sites in Greater London, Scotland, Wales, Republic of Ireland, and Northern Ireland have been excluded;
- **Survey Day** – Only surveys carried out Monday to Friday have been included;
- **Survey Date** – Only the most recent survey has been included for each site;



- **Size** – Sites between 5 and 300 dwellings have been included; and
- **Location** – Only sites classified as Neighbourhood Centre have been included.

4.1.5 The resultant person trip rate per dwelling and person trip generation for 150 dwellings is presented in Table 4-1. The full outputs are provided in **Appendix E**.

Table 4-1: Person Trip Generation

	Weekday AM Peak (08:00 – 09:00)			Weekday PM Peak (17:00 -18:00)		
	Arrivals	Departures	Two-Way	Arrivals	Departures	Two-Way
Person Trip Rate (per dwelling)	0.197	0.556	0.753	0.456	0.185	0.641
Person Trip Generation*	30	83	113	68	28	96

**Numbers in table have been rounded*

4.1.6 To calculate the vehicle trip generation, multi-modal trip purpose data has been extracted from TEMPro (v7.2b) for the Middle Super Output Area (MSOA) that the majority of the site is within (South Staffordshire 006). South Staffordshire 006 MSOA includes the western half of the village of Featherstone as well as adjacent villages of Coven, Coven Heath, Four Ashes and Shareshill. It is considered that for the purposes of this assessment it provides a robust basis for assessment.

4.1.7 The mode share data for home based trips extracted from TEMPro for South Staffordshire 006 is presented in Table 4-2.

Table 4-2: TEMPro Mode Share Data (Home Based Trips) - South Staffordshire 006

Mode	Weekday AM Peak		Weekday PM Peak	
	Origin	Destination	Origin	Destination
Walk	12%	11%	10%	11%
Cycle	2%	2%	2%	2%
Car Driver	55%	63%	63%	59%
Car Passenger	23%	20%	21%	23%
Bus & Coach	6%	4%	3%	4%
Rail & Underground	2%	0%	1%	2%
Total	100%	100%	100%	100%

4.1.8 Table 4-3 presents the resultant vehicle trip generation when the mode share set out in Table 4-2 is applied to the person trip generation in Table 4-1. This shows that the site is forecast to generate 65 two-way vehicle trips in the AM peak and 58 two-way vehicle trips in the PM peak. Given that the site is located within the village of Featherstone, it is likely that a number of trips to local facilities would be self-contained within the village. At planning application stage, trip generation may need to be considered through assessment of a local donor site in Featherstone, and the methodology agreed with SCC as highway authority.

Table 4-3: Vehicle Trip Generation

	Weekday AM Peak (08:00 – 09:00)			Weekday PM Peak (17:00 -18:00)		
	Arrivals	Departures	Two-Way	Arrivals	Departures	Two-Way
Person Trip Rate (per dwelling)	0.197	0.556	0.753	0.456	0.185	0.641
Person Trip Generation*	30	83	113	68	28	96
Vehicle Trip Generation*	19	46	65	40	17	58

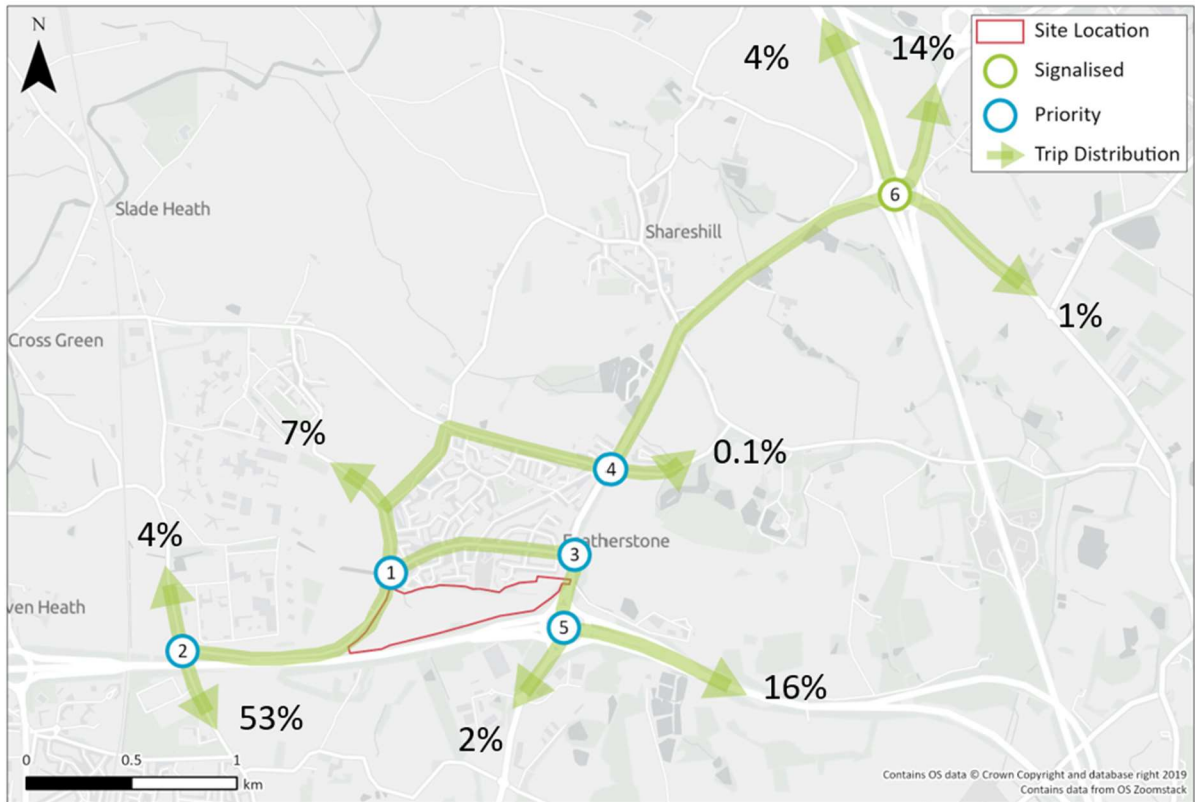
**Numbers in table have been rounded*

Trip Distribution and Assignment

- 4.1.9 The distribution of development traffic is based on 2011 census journey to work data for the MSOA in which the site is located, South Staffordshire 006. South Staffordshire 006 MSOA includes the western half of the village of Featherstone as well as adjacent villages of Coven, Coven Heath, Four Ashes and Shareshill. It is therefore considered that this provides a suitable representation of the likely travel patterns of the development site.
- 4.1.10 The assignment of the development trips onto the local highway network has been calculated using online routing software for a journey during peak periods (typical Wednesday at 08:30am). Development trips were assigned based on the journey from the proposed site access (Brookhouse Lane) to the centre point of each MSOA. The resultant trip assignment is shown in Figure 4-2.



Figure 4-2: Trip Assignment



4.1.11 The distribution provides the routes onto which the trip generation will be assigned. The trip assignment for the weekday AM and PM peak periods through key junctions in the study area is presented in Table 4-4. The location of these junctions is shown in Figure 4-1.

Table 4-4: Vehicle Trip Assignment - Key Junctions

Junction		Junction Form	Two-Way Vehicle Trip Generation	
			Weekday AM Peak	Weekday PM Peak
1	Brookhouse Lane / East Road	Priority	28	27
2	Brookhouse Lane / Cat and Kittens Lane	Priority	37	33
3	The Avenue / A460 Cannock Road	Priority	11	10
4	New Road / A460 Cannock Road / Dark Lane	Signalised Crossroads	12	11
5	M54 Junction 1 / A460	Roundabout	11	10
6	M6 Junction 11 / A460 / A462	Signalised Roundabout	12	10

4.1.12 Table 4-4 shows that the junction through which the development will add the most trips is the Brookhouse Lane / Cat and Kittens Lane junction. It is forecast that 37 two-way trips will be added through this junction in the AM peak and 33 two-way trips in the PM peak. This equates to less than one vehicle per minute. It is likely that due to congestion on the A460 during peak periods, vehicles would use this route to access Wolverhampton and surrounding areas rather than A460. A minimal



level of trips are forecast to route through junctions 3 to 6, with up to 12 two-way trips in each peak period.

DRAFT



Appendix D Site Access Drawing

DRAFT

Appendix E TRICS outputs - residential

DRAFT



DRAFT