

Strategic Planning Team
South Staffordshire Council
Council offices
Wolverhampton Road
Codsall
WV8 1PX

Our Ref: CCB/4203

16th November 2021

Dear Sirs

**4867: SOUTH STAFFORDSHIRE COUNCIL LOCAL PLAN REVIEW PREFERRED
OPTIONS CONSULTATION NOVEMBER 2021**

We have reviewed all the Preferred Options consultation document and the supporting evidence base and we welcome the opportunity to submit comments to the above consultation on behalf of our client Wollaston Properties, T Rissbrook, Staffordshire County Council in respect of site 211 the land north of Manor House Park, Bilbrook which has not been selected as a proposed allocated site.

We set out our responses to the questions posed below.

Question 1:

Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No

Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to.

In regards to the topics covered in the list of documents in Appendix A, yes we agree to the evidence base used to inform the new Local Plan.

Question 2:

(a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP? Yes/No

(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver? Yes/No

Yes, we have reviewed the IDP and have no objections to infrastructure requirements that are set out in the document in connection to Bilbrook.

We understand there is the requirement of a First School to serve Codsall/ Bilbrook; the delivery of a through road from Pendeford Mill Lane to Lane Green Road, Bilbrook; Junction improvements at Wobaston Road/Overstrand Road traffic signals are the most significant which impact on Bilbrook.

Question 3:

a) Have the correct vision and strategic objectives been identified? Yes/No

We do not object to the strategic objectives set out in Table 6 of the plan. It is important to note, not all developments will be able to meet all of the strategic objectives and that should not be found to be a criticism of the development if the proposed scheme remains sustainable and otherwise policy compliant.

b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No

We do not object to the strategic objectives set out in Table 6 of the plan. It is important to note, not all developments will be able to meet all of the strategic objectives and that should not be found to be a criticism of the development if the proposed scheme remains sustainable and otherwise policy compliant.

Question 4:

Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside? Yes/No

If no, please explain how these policies should be amended?

Policy DS1 – Green Belt is similar to both National and the current planning policy for Green Belt.

We welcome the proposal for a separate GB SPD to be prepared which will take into consideration the latest updates in the NPPF published in July 2021.

In both the Green Belt and open countryside again, it is necessary to be in accordance with National Policy however it is also necessary to acknowledge sustainability should be factored into the suitability of sites for future development. A site located on the edge of a built-up area should be considered more favourably than a site located in a more rural area.

In regards to the alterations of both Green Belt and Open Space boundaries our comments will be submitted and discussed in response to Question 7.

We agree with the inclusion of Codsall/ Bilbrook as a tier 1 settlement due to the high sustainability of the settlement and the range of services and facilities which the settlement has to offer.

Question 5:

Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? Yes/No

If no, please explain how this policy should be amended?

Yes, we support the spatial strategy set out in policy DS3: The Spatial Strategy.

We agree Bilbrook has the capacity to accommodate further development and consider the site 211: the land north of Manor House Park should be included as an

allocated site or at least a safeguarded site to assist with meeting the current and future needs of Bilbrook.

As a minimum we consider site 211: the land north of Manor House Park should be identified as safeguarded land for future development.

Question 6:

Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement? Yes/No

If no, please explain how this policy should be amended?

We consider there should be increased emphasis on the safeguarding of sites on the edge of the built-up areas to cater for future development needs.

The proposed new settlement will require a significant level of investment, infrastructure and collaboration between a high number of key players/ stakeholders including land owners, where there is also the potential for there to be more than one; housebuilder; the provision of infrastructure, services and facilities, including employment, education, medical needs and meeting the everyday needs of the new community of the settlement. The creation of a new settlement is a momentous task and despite the new settlement being planned for beyond the Local Plan Review period (beyond 2038), it is important to be realistic in the timeframes in which it will take to deliver a new settlement and therefore there should be the allocation of safeguarded land to cater for future development needs beyond the plan period that can be delivered at a quicker rate and offer an alternative strategy.

Site 211: the land north of Manor House Park, should at the very least be allocated as Safeguarded Land.

Question 7:

a) Do you support the proposed strategic housing allocations in policies SA1-SA4? Yes/No

If no, please explain your reasons for this.

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code? Yes/No

We understand the land east of Bilbrook, is intended to accommodate approximately 848 dwellings, a new first school, on site retail, open space and infrastructure.

There are no principle objections to the proposed strategic allocations, however, there are concerns regarding the delivery of the site.

There is limited information surrounding the costing and delivery of the site. These are fundamental elements of the proposed development and the delivery of the 848 dwellings, primary education and onsite open space with biodiversity improvements proposed.

We understand one of the fundamental elements of the site and why it has been chosen as a strategic allocation is due to the first school and the close proximity of the site to employment areas including I54 and Pendeford Business Park and therefore we consider there should be more details available at this stage for interested parties to consider to make an informed choice in regards to the delivery of the site. Details such as delivery trajectory and all the key funding strands for the site should be considered at this stage due to the significant size of the site and what it is intended to deliver.

Should the site not fulfil the intended obligations or suffer any sent backs and delays there is the potential that The Council would have a significant shortage of land to meet the housing needs of the local plan period.

We therefore consider it is prudent and essential for the Council to allocated safeguarded land that has the ability to come forward to meet the needs of the District.

Site 211 is located within a suitable walking distance from a range of services and facilities available within Bilbrook, and benefits from existing high frequency bus services which pass the site. The site could deliver a significant number of homes early in the plan period in a highly sustainable location.

We support the allocation of site 211 within the Local Plan at least as a Safeguarded site.

Question 8:

**Do you support the proposed housing allocations in Policy SA5? Yes/No
Please reference the site reference number (e.g site 582) for the site you are commenting on in your response.**

We are disappointed to see site 211: Land north of Manor House Park has not been allocated as a residential site in the Local Plan Review.

We have reviewed the Housing Site Selection Topic Paper Appendix 3 - Site Proformas in connection to site 211 and note the known constraints are listed as:

- A large portion of the site is within Flood Zones 2 and 3, with an irregular shaped portion of land measuring approximately 3.1ha of land lying outside the flood zone
- The site could provide access to pedestrian footways into the wider settlement.
- Its development would see the loss of grassland interspersed with well-established tree and shrub planting
- The site is within a mineral safeguarding area

We consider the above require a little further explanation.

We agree part of the site is located within Flood zones 2 and 3 however, the scheme has been designed to take that into consideration and avoid these zones. The site has directed all the built development to the areas of the site which are located within flood zone 1, which is the majority of the site.

We agree the site has access to pedestrian footways into the wider settlement which is an attribute of the site.

As part of the proposed development of the site, the residential development would be adjacent to the existing built-up area with the remainder of the site would be open space within significant improved biodiversity. We therefore consider there would scope as part of the development to ensure an improved ecological environment. The layout has been designed to ensure minimal disruptions and displacement of well-established tree and shrub planting.

Again, similar to my comments above the majority of this region is identified as a mineral safeguarding area and therefore should not be seen as a constraint of the site. There is little or no prospect of the mineral being worked on this site.

The Housing Site Selection Topic Paper then proceeds to state the key positives and negatives in the summary conclusions, which states:

- *Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate')*
- *Similar landscape sensitivity to the majority of land around Bilbrook/Codsall (site is 'moderate')*
- *Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook*

Conclusion

Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, 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, Sites 519, 224, SAD Site 228 and 419a&b.

We consider the Council's own summary fails to identify any significant constraints of the site that would prevent the site being allocated to provide an additional site in Bilbrook.

We accept that the site is unable to accommodate the required Codsall station car parking or required first school for Codsall/Bilbrook, however, this does not render the site unsuitable for accommodating homes in a sustainable location.

The summary continues and concludes with reference to sites safeguarded sites 519 and 419a&b, SAD site 228 and 224 outperforming site 211.

Sites 419a&b and 519 are both sites identified in the Site Allocations Documents as safeguarded land. Although site 519 has been enlarged to include an additional parcel of land to that of the safeguarded site. Site 228 is within the existing development boundary and an existing housing allocation.

Site 224 however, appears to be a new site selection for the Local Plan review and expected to accommodate approximately 85 dwellings and a 30-space car park for Codsall railway station.

We consider site 211 should be allocated alongside the above to provide additional housing in Codsall/Bilbrook as a tier 1 settlement which is intended to accommodate significant percentages of the housing growth with a plethora of services and facilities to meet the needs of current residents and support new residents.

Table 4.4: Impact matrix of site assessments pre-mitigation of the Sustainability Appraisal states the below criterion in which sites are assessed. As can be seen from the extract below, site 211 is compared to all other sites allocated in Codsall/Bilbrook and has the same rating against nearly every criterion except for two. Landscape & Townscape and Economy & Employment.

Site Reference	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
Bilbrook and Codsall												
211	+/-	-	+/-	-	-	-	+	-	-	-	-	-
224	+/-	-	+/-	-	-	-	+	-	-	-	-	+
SAD 228	+/-	+	+/-	-	-	-	+	-	-	++	++	+
419a/b	+/-	+	+/-	-	-	-	+	-	-	-	-	-
519	+/-	-	+/-	-	-	-	+	-	-	-	-	-

Key

Major Negative --	Minor Negative -	Negligible 0	Uncertain +/-	Minor Positive +	Major Positive ++
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In connection to Landscape & Townscape, site 211 is considered to outperform sites 224 and 519 and is on par with sites 228 and 419a&b.

In connection to Economy & Employment, site 211 is considered to be on par with sites 419a&b and 519.

In connection to Economy & Employment paragraph B.2.12.2 of the Sustainability Appraisal states; “*Sites 210, 213, 221, 224, SAD228, 447, 503 and 510 are located in areas with ‘reasonable’ sustainable access to employment opportunities, and therefore, the proposed development at these eight sites would be expected to have a minor positive impact on site end users’ access to employment. Sites **211**, 222, 236, 419a/b, 507, 512, 515, 519, 630a, 630b, 666 and 703 are located in or adjacent to areas with ‘poor’ or ‘unreasonable’ sustainable access to employment opportunities, and therefore, the proposed development at these 12 sites would be expected to have a minor negative impact on site end users’ access to employment.*”.

We do not consider site 211 has poor connectivity to economy & employment. The site is within 2 miles from Owens Trading Estate, Pendeford Business Park and I54 which are all located off Wobaston Road all of which provide a plethora of job opportunities. All of which are accessible by a range of modes of transport including bus stops being

located within a short walk of the site providing regular access to these locations. We therefore consider the site should receive a higher/ better score than minor negative.

There are a plethora of positives connected to the site which have been set out in representations to previous consultations which should be taken into consideration. The site can accommodate approximately 65 dwellings in a highly sustainable location and provide extensive areas of open space that will improve the biodiversity on site but also provide the local community with improved access to areas of green space. There are many benefits that would arise from site 211 Land at Manor House Park being allocated for future development.

The site is available and deliverable. It is an important part of what should be considered in the allocation of sites in the Local Plan Review and to be confident that the housing needed would be delivered in a timely manner. This site is available now and has the ability to be delivered within the first 5 years of the plan period.

With the above taken into consideration we consider site 211 should be allocated for residential development alongside sites 224,228,419a&b and 519 to provide a variety of allocations along for Codsall/Bilbrook or in the very least site 211 should be allocated as safeguarded land for future development for the next Local Plan Review.

Question 11:

**Do you agree with the proposed policy approaches set out in Chapter 6? Yes/No
If no, then please provide details setting out what changes are needed,
referencing the Policy Reference number (e.g HC1 - Housing Mix).**

We understand that the policies set out in chapter 6 are a combination of the adopted Core Strategy and Site Allocation DPD policies as a starting point and as a result of responses received to the 2018 issues and options consultation.

In regards to policy HC1: Housing mix, we understand the need to provide a greater number of 2- and 3-bedroom properties, however, it is also important to note that each development should be assessed on a case by case basis with the merits of each proposal taken into consideration. Also, there is the requirement for the key considerations and characteristics of the site and the area/settlement in which the development is to take place to be considered.

We therefore consider a level of flexibility should be applied to housing mix to ensure diversity and prevent all development looking the same and lacking any distinctiveness.

In connection to policy HC3: Affordable housing, we welcome the introduction of 30% affordable housing which we consider is an improvement on 40% as set out in the existing adopted Local Plan.

With the emphasis on the increase of 2 and 3 bedroomed properties on developments throughout the District in conjunction to the requirement for a contribution to meeting the needs of the District's ageing population in policy HC4- Homes for Older People,

as previously stated, it is important to ensure that there is a level of flexibility and diversity on sites so there is individuality and uniqueness achieved.

Question 12:

a) It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree these are strategic policies? Yes/No

b) Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies? Yes/No

If yes, then please provide details including the Policy Reference (e.g HC1 – Housing Mix)

Yes, we agree policies DS1-DS4 should be strategic policies, despite any comments we made about the detail of the policies above.

Paragraph 21 of the NPPF states, “Plans should make explicit which policies are strategic policies¹⁴. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies”.

With the above taken into consideration, we do not consider policies SA1-SA4 should be included as strategic policies as they are fairly detailed policies which paragraph 21 states this should not include as that should be left to other non-strategic policies.

We would welcome the opportunity to further discuss the site and these representations with officers.

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