

# Land at Wollaston Road / Bridgnorth Road

Representation to South Staffordshire's Local Plan Review –  
Preferred Options Consultation

On behalf of Balfour Beatty Group

December 2021

# Contents

- Introduction.....1
  - Overview.....1
  - The Site.....1
- Preferred Options – Chapter 3.....2
- Preferred Options – Chapter 4.....3
- Preferred Options – Chapter 5.....4
- Preferred Options – Chapter 6.....6
- Appendix A – Location Plan.....8

# Introduction

## Overview

1. This is a submission to the South Staffordshire Local Plan Review – Preferred Options Consultation, which is open for public consultation until **Monday 13<sup>th</sup> December 2021**.
2. This document follows on from previous submissions (made by CBRE Ltd on behalf of Balfour Beatty Group). Previous representations have been made to the following consultations:
  - Emerging Local Plan at Issues and Options Stage (November 2018);
  - Strategic Housing and Economic Land Availability Assessment (SHELAA) (November 2018); and
  - Spatial Housing Strategy (December 2019).
3. A Pre-Application enquiry relating to the potential for residential proposals at the site was conducted in 2020.
4. The remainder of this document provides an overview of the site and our comments in response to the questions raised in the South Staffordshire Preferred Options Consultation Document.

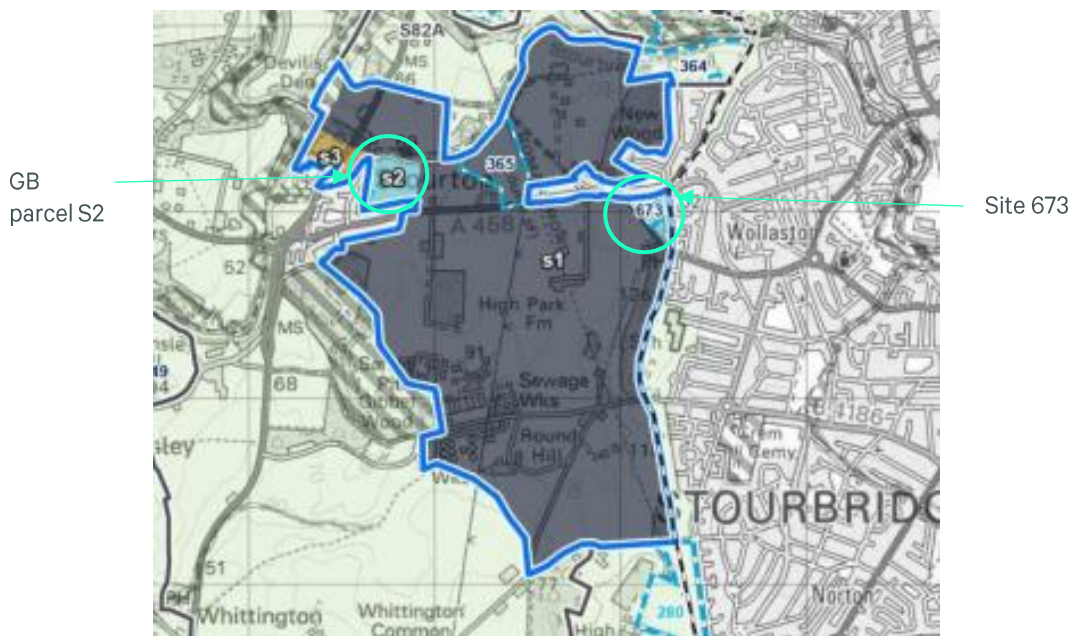
## The Site

5. The site is located adjacent to the settlement of New Wood, and to the west of Wollaston village. It is bound by Wollaston Road and Bridgnorth Road. It measures approximately 3.43 acres (1.39 ha) and has previously been used for agricultural and equestrian uses, however, it has not been used for such uses for some time and is currently low grade unused land. This land is currently designated as Green Belt. A site plan is included at **Appendix A** for reference.
6. It is considered that the site is suitable for residential development (in the region of 30 dwellings), with number, type and tenure to be determined at a later stage.
7. The site is included in South Staffordshire's Strategic Housing and Employment Land Availability Assessment (SHELAA) (reference: 673) published in 2021 and is included in other Local Plan Evidence Base documents, including South Staffordshire's Green Belt Study (2019).

# Preferred Options – Chapter 3

**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.**

8. No. The Green Belt Review 2019 is inaccurate.
9. The Green Belt Review, published in 2019, provides an assessment of the contribution of parcels of land across South Staffordshire to the Green Belt. The site, promoted on behalf of CBRE between Bridgnorth Road and Wollaston Road (ref: 673), is located within parcel S82B of the Green Belt Review 2019.
10. Whilst the whole area of parcel S82B is assessed within the document as having a Moderate – High contribution to the Green Belt, the Stage 2 assessments break the parcels down further. On page 801 of the Green Belt Review, it identifies the site (ref: 673) as within S82Bs2. This is incorrect, parcel S82Bs2 is located approximately 1.4km to the west of site 673 and not connected on any of its boundaries, as highlighted on the plan below.



Source: Green Belt Study 2019, page 802

11. It is therefore unclear how the site (ref: 673) scores in the Green Belt assessment as the description included at page 801 references boundaries and locations not associated with the site. We consider that it is not appropriate to group these sites together for assessment as the context for each parcel is different.
12. In previous representations made to the emerging Local Plan we provided an assessment of our client's sites contribution to the Green Belt's five purposes, as defined in the NPPF. It was considered that in overall terms our client's site does not significantly contribute towards the purpose of including land within the Green Belt, due to existing development adjacent to two of the sites' three sides, distance to neighbouring towns and existence of the A458 Bridgnorth Road as a defensible barrier to the sites boundary. Thus the development

of the site would not encroach into the countryside or encourage neighbouring towns to merge with each other, with the Bridgnorth Road providing the defensible boundary to prevent the unrestricted sprawl of large built-up areas.

13. This assessment should be revisited as a matter of urgency to accurately inform the site selection, particularly to justify site allocations, as currently the assessment is flawed and not justified.

## Preferred Options – Chapter 4

### Question 5 – Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038?

14. The Preferred Options Consultation document (paragraph 4.10) identifies that there is still a need to deliver the strategic growth levels recommended in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Strategic Growth Study, in order to ensure that emerging and existing shortfalls from the conurbation are addressed in a genuinely sustainable manner. Consequently, South Staffordshire are proposing a 4,000 dwelling contribution towards the unmet needs of the GBBCHMA. The Black Country is identified as having a shortfall of 28,239 homes<sup>1</sup> across the emerging Black Country Plan period (2018-2039).
15. As outlined within the Preferred Options consultation document, Local Planning Authorities have a legal duty to cooperate with neighbouring authorities and it is evident that unmet housing need across the GBBCHMA is a key cross boundary issue that will need to be addressed with neighbouring authorities (including South Staffordshire's role in meeting a proportion of the shortfall) through plan preparation. Greater consideration should be given throughout the Local Plan in relation to sites of varying sizes adjacent to neighbouring towns and cities to assist in meeting housing need.
16. There are spatial planning advantages of allocating sites adjacent to neighbouring authorities' boundaries to maximise the presence of existing infrastructure and ensure sustainable development, in accordance with Paragraph 11 of the NPPF, to meet the housing shortfall in these authorities. Furthermore, it is worth noting that the Black Country Housing Market Assessment Final Report, published in March 2021, alongside consultation on the Draft Black Country Plan, outlined that those commuting into the Black Country for work were most likely to live in Birmingham or South Staffordshire (para 1.15). Additionally, the Housing Market Assessment identifies that the Black Country's most established linkages are those with the neighbouring Councils immediately to the west and east of the housing market area, notably South Staffordshire and Birmingham, thus reinforcing the importance of sites adjacent to neighbouring towns and cities in the role of economic prosperity.
17. Land at Wollaston Road, (ref: 673), whilst located within the authority boundary of South Staffordshire, adjoins the existing urban settlement of Wollaston, which is located within the Authority boundary of Dudley. Wollaston is identified in the Draft Black Country Plan's Strategy as a District and Local Centre, where current policy outlines that new development should be of a scale and nature to serve the centre and its catchment.

---

<sup>1</sup> Paragraph 3.21 of Black Country Plan Regulation 18 Consultation Document (August 2021)

Consequently, it would be appropriate for development at this site to contribute to meeting the wider 28,239 dwelling shortfall across the GBBCHMA as identified in the emerging Black Country Plan Consultation Document (August 2021).

18. Whilst Policies SA2, SA3 and SA5 do include a number of sites adjacent to neighbouring towns and cities, these number only in the region of 3,000 dwellings and are all large sites which will typically take longer to assemble and deliver than smaller sites i.e. only the first phase of a larger site could be completed in 5-years, whereas a smaller site could be completed and occupied within the same timescales. As a consequence, fewer sites will come forward in the near future to benefit the wider HMA and to significantly boost housing supply. We recommend that in addition to existing larger allocations, which are needed to unlock longer term housing requirements at land adjacent to neighbouring towns and cities, that consideration be given to the allocation of smaller sites adjacent to neighbouring towns and cities to provide earlier cross-authority benefit in meeting cross-boundary housing needs and in boosting significantly the supply of homes, in accordance with Paragraph 60 of the NPPF.
19. Additional smaller site allocations adjacent to existing towns and cities should be included within the spatial strategy, including our Client's site (ref: 673).

## Preferred Options – Chapter 5

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

20. It is important that a range of site sizes are brought forward in Policy SA5, noting particularly the importance of Green Belt release and those smaller sites which can bring forward development in shorter timescales than their larger counterparts, thus significantly boosting the supply of homes in accordance with paragraph 60 of the NPPF. We consider the distribution of allocated sites to be unequal and that the distribution does not fully reflect the importance of sites which are adjacent to neighbouring towns and cities and how they can contribute to the needs of South Staffordshire and neighbouring authorities.
21. The Preferred Options Housing Site Selection Topic Paper (September 2021) (SSP) identifies the following sites to be carried forward as allocations within the emerging South Staffordshire Local Plan. The below sites are all identified as being located adjacent to neighbouring towns and cities:
  - Land at Cross Green (Northern Edge of the Black Country) (minimum delivery approx. 1,200 dwellings) (emerging allocation in Policy SA2 of emerging Local Plan Consultation document)
  - Land off Linthouse Lane, Wednesfield (Northern Edge of the Black Country) (minimum delivery approx. 1,200 dwellings across plan period) (emerging allocation in Policy SA3 of emerging Local Plan Consultation document)
  - Land off Langley Road (Western Edge of the Black Country) (minimum delivery 390 dwellings) (ref: 582) (emerging allocation in Policy SA5 of emerging Local Plan Consultation document)
  - Land at Weeping Cross (Southern Edge of Stafford) (minimum delivery 168 dwellings) (ref: 036c) (emerging allocation in Policy SA5 of emerging Local Plan Consultation document)
22. The SSP identifies that the Land North of Langley Road site (ref: 582) is:
  - In an area of lower Green Belt harm than the majority of other land adjacent to the Black Country;
  - Of similar landscape sensitivity to other land in the vicinity; and

- Raises a major positive effect against the Education criteria in the Sustainability Appraisal (SA), reflecting its close proximity to facilities in the Black Country urban area.
23. Our client's site at Wollaston Road is identified as being within a similar area of Green Belt harm (although this should be reassessed in line with our comments to question 1) and of similar landscape sensitivity as Land North of Langley Road (Policy SA5, ref: 582). This is further emphasised in the Green Belt Study (2019), which notes that Langley Road (ref: 582) and Land at Wollaston Road (ref: 673) and their surrounds are rated moderate to high in regard to impact on Green Belt, were the sites to be released. However, as per our response to Question 1 it is apparent that Site 673 has been incorrectly assessed in the Green Belt Study and the approach to site selection is therefore flawed, as the descriptions and references on page 801 to boundaries and locations are not accurately associated with the site. Consequently, this assessment must be revisited to justifiably and correctly inform site selection as it is our assertion that the Wollaston Road site (ref: 673) is better positioned in Green Belt terms than has been assessed, and would be appropriate for inclusion as an allocation within the emerging Plan.
24. The explanatory text at paragraph 5.25.8. of the SSP identifies that Site 673 is adjacent to the Dudley Metropolitan Borough, which has a lower level of unmet need than other authorities within the HMA, such as Wolverhampton. Consequently, the SSP notes that those sites which border authorities with greater housing need should be prioritised over sites which borders authorities with lower housing need. We consider this to be a flawed approach to the allocation of sites and would draw attention to the legal duty to cooperate with neighbouring authorities that South Staffordshire are required to comply with and note that meeting unmet housing need across the entirety of the GBBCHMA as a whole is a key cross boundary issue that will need to be continually addressed across all neighbouring authorities. All authorities within the HMA have a role in meeting a proportion of the housing shortfall through plan preparation and suitable allocations. This is not in the best interest of cross-authority co-operation and neglects to consider the overall focus of co-operation, sustainable development and economic growth which will arise from growth and housing contributions in suitable and sustainable locations across the entirety of the HMA, not just within specific authority boundaries.
25. Both Land off Langley Road and Land at Weeping Cross sites (ref: 036c and 582) are adjacent to neighbouring towns and cities and are allocated under Policy SA5 for a significant number of dwellings (namely 390 dwellings and 168 dwellings). Chapter 5 (delivering a sufficient supply of homes) of the NPPF 2021 identifies that it is important that a sufficient amount and variety of land can come forward where and when it is needed, with land with permission developed without unnecessary delay in order to boost significantly housing delivery and address housing shortfall in the short-term. It is recognised that larger sized development sites, such as those referenced above, are not likely to deliver until at least the mid-2020s due to these sites taking longer to assemble and develop than smaller sites i.e. only the first phase of a larger site could be completed in 5-years whereas a smaller site could be completed and occupied within the same timescale. Having a balanced portfolio of housing sites capable of delivery across the entirety of the Plan period is an important consideration.
26. Whilst Policy SA5 does include a number of smaller sites, it does not provide for a range of smaller sites at land adjacent to neighbouring towns and cities, thus resulting in fewer sites coming forward at these cross-boundary areas in the early years of the plan period to benefit the wider HMA. We would recommend that in addition to existing larger allocations, which are needed to unlock longer term housing requirements at land adjacent to neighbouring towns and cities, that consideration be given to the allocation of smaller sites adjacent to neighbouring towns and cities to provide earlier cross-authority benefit in meeting cross-boundary housing needs.

# Preferred Options – Chapter 6

**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).**

## Policy HC1 (Housing Mix)

27. As we set out in the response to the Issues and Options consultation in 2018, it is important that a housing mix policy is sufficiently flexible to respond to market fluctuations and demands and that Option A of that consultation would achieve this. We note that the Preferred Options consultation document proposes a policy which is a combination of Options A and B from the 2018 consultation. It is disappointing that the proposed policy is prescriptive and does not refer to the proposed housing of a development site to be informed by the latest SHMA or other evidence base documents enabling flexibility to reflect local needs and demands at different times during the plan period.

28. We suggest that the policy should require consultation of appropriate evidence based documents such as Market Housing Reports and also consider market demand. Prescribing a specific mix may have negative implications on housing delivery, if market demand does not coincide with policy at a particular time. The following wording could be used for policy HC1:

*“Developments of ten homes or more should provide a range of house types and sizes that will meet the accommodation needs of both existing and future residents, in line with the most recently available information, such as:*

- *The South Staffordshire HMA 2021 (or any subsequent revision); or*
- *Detailed Local Housing Market Assessments (where applicable); or*
- *Current and future demographic profiles; or*
- *Locality and ability of the site to accommodate a mix of housing; or*
- *Market signals and local housing market trends.”*

29. A housing mix policy should encourage applicants to demonstrate why the proposed mix on a site is appropriate considering up to date South Staffordshire evidence base documents and market knowledge. NPPF paragraph 62 suggests that the size, type and tenure of housing needed should be reflected in policy. We consider that in the context of South Staffordshire, reference to the evidence base is appropriate to address housing mix, as is the approach taken in other Local Plans in the West Midlands.

## Policy HC2 (Housing Density)

30. Whilst increasing densities of development is a logical way to increase housing supply, local character and context must also be taken into consideration. Through the site selection process, the density capability of the site should be assessed using available information at that stage to ensure that those chosen can deliver an appropriate number of dwellings. It is our view that a policy which is flexible would be beneficial for both allocated and unallocated sites. For example, if seeking a 35dph as standard on development sites, the proposed policy should also make provision for applicants to put balanced proposals forward which



demonstrate how they have taken into account the specific site character and context of the site whilst also encouraging as high a density as possible.

#### Policy HC3 (Affordable Housing)

31. We consider that the policy should specify how exceptional circumstances for offsite, and/or reduced, Affordable Housing provision is to be evidenced and negotiated i.e. through a viability assessment, during the planning process. Furthermore, the Policy should specify whether smaller sites will require Affordable Housing contributions or if they are exempt. A threshold figure should be provided in relation to the sizes of sites and their requirement for Affordable Housing. It is worth noting that in viability terms it is generally more difficult to accommodate on-site affordable housing on smaller development sites, as such any adopted policy should reflect this, and allow for flexibility in provision where it is not viable for on-site provision to be had.

#### Policies HC4 (Homes for Older People) and Policy HC5 (Specialist Housing Schemes)

32. In accordance with the NPPF's emphasis on a range of size, types and tenures of housing needed for different community groups, including older people, people with disabilities and students, we support the provision of a range of housing and the policies which contribute to this.
33. We would request that Policy HC4 clarify where exemptions are to be made to the requirement for Affordable Housing. For example, specifying that Housing Developments which provide specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students) are exempt to the requirement to provide Affordable Housing, as is specified in the NPPF (paragraph 65) and also Paragraph 2.7.10 of the Viability Study (2021) which forms part of the emerging Local Plan's evidence base.
34. In regard to Policy HC5 we would request that the number of units for Specialist Housing be published and for the identification of any potential sites which would be able to accommodate demand also be included.

# Appendix A – Location Plan



**Promap**  
LANDMARK INFORMATION GROUP

Delivered by **©2021 CBRE, INC.** All rights reserved.  
License number 10002443. Pictorial - 0.1129