

**SOUTH STAFFORDSHIRE COUNCIL LOCAL PLAN PREFERRED OPTIONS CONSULTATION**  
Representations on behalf of Vistry Group  
November 2021

**INTRODUCTION**

1. These representations to the South Staffordshire Council Local Plan Preferred Options Consultation Document (November 2021) and relevant supporting documents have been prepared by Rapleys on behalf of Vistry Group ('Vistry'). They seek to advance the case for the allocation of Land South of Pendeford Hall Lane, Bilbrook as an urban extension within the emerging Local Plan, and are structured as follows:
  - Proposals for Land South of Pendeford Hall Lane, Bilbrook
  - Response to the Preferred Options Consultation Document - focussing on specific questions

**PROPOSALS FOR LAND SOUTH OF PENDEFORD HALL LANE, BILBROOK**

2. The Land South of Pendeford Hall Lane, Bilbrook ('the Site') comprises six agricultural fields on the northern edge of Bilbrook. It is bound by Pendeford Hall Lane to the north, Watery Lane to the west and by the Staffordshire Union Canal to the east. The southern boundary is formed by a mature tree belt and sections of hedgerow, which run alongside the course of Moat Brook; a tributary of the River Penk. A Site Location Plan is enclosed at **Appendix 1**.
3. The proposals for Land South of Pendeford Hall Lane:
  - Around 1,200 Mixed tenure dwellings
  - Associated social and community infrastructure, including 1 no. 2 form entry primary school and a local centre/transport hub.
  - Associated green infrastructure including the provision of LEAP's, NEAP's, a MUGA, sports pitches, allotments, allotments, a community orchard and a new wildlife area.
4. A Vision Document which describes the proposals and how they have been developed is included at **Appendix 2**.

**RESPONSE TO THE PREFERRED OPTIONS CONSULTATION DOCUMENT**

5. Our responses to various questions in Preferred Options Document are set out below. All comments are intended to be constructive and are made with the intention of ensuring that the Local Plan is found 'sound' in the context of the tests of soundness set out at paragraph 35 of the National Planning Policy Framework ('NPPF').

**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.**

6. The importance of a robust evidence base is set out in the NPPF. At paragraph 31 it states:

*"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."*
7. This is reflected in the inclusion of 'Justified' as one of the four tests of soundness that must be met for a plan to be found sound. The NPPF definition of 'Justified' is:

*"an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence"*

8. In respect of the above requirements, it should be noted that Vistry has no issue with the scope of the evidence base or the types of documents that have been prepared. However, a number of the key documents have significant flaws which mean that the strategy and policies proposed in the Preferred Options Consultation Document are not justified. These flaws need to be addressed and the strategy and policies amended accordingly to ensure that the Local Plan can be found sound at examination. The documents and the flaws that have been identified are set out below.

**Duty to Cooperate Topic Paper (November 2021)**

9. Paragraph 24 of the NPPF states:

*"Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries."*

10. One of the key strategic matters where the cooperation between authorities is essential is unmet housing need. Paragraph 11(b) of the NPPF states:

*"strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>6</sup>"*

11. The related footnote (6) refers to paragraph 27 of the NPPF which states:

*"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 planning guidance, and be made publicly available throughout the plan-making process to provide transparency"*

12. South Staffordshire Council ('the Council') acknowledge the issue of unmet need is central to the emerging Local Plan as district falls within the Greater Birmingham that Housing Market Area<sup>1</sup> ('GBHMA') which contains two development plan areas (Birmingham City and the Black Country<sup>2</sup>) with significant unmet housing needs. While there is currently no formal agreement on the exact level of unmet need across the GBHMA as a whole the emerging evidence indicates that is substantial. For example:

- The Birmingham Plan adopted in January 2017 advised that the City has unmet need of 37,900 dwellings.
- The GBHMA Strategic Growth Study (February 2018) commissioned by the fourteen GBHMA authorities concluded that unmet need for the HMA was around 28,000 dwellings for the period to 2031, and around 61,000 dwellings for the period to 2036.
- The Draft Black Country Plan that was published for consultation in July 2021 identified that for the four constituent authorities alone there would be an unmet need of 28,239 dwellings for the period up to 2039.

13. In its Issues and Options Paper that was published for consultation in October 2018 the Council acknowledged the Staffordshire would likely need to accommodate some of the unmet need from authorities within the HMA and set out five growth policy options. They comprised:

<sup>1</sup> The GBHMA comprises Cannock Chase District Council, Wolverhampton City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Metropolitan Borough Council, Tamworth Borough Council, Birmingham City Council, South Staffordshire District Council, North Warwickshire District Council, Redditch Borough Council, Lichfield District Council, Bromsgrove District Council, Solihull Metropolitan Borough Council and Stratford on Avon District Council.

<sup>2</sup> The Black Country Authorities comprise Dudley, Sandwell, Walsall and the City of Wolverhampton.

- Option A: No contribution towards unmet needs within the GBHMA.
- Option B: A contribution of 1,900 dwellings towards unmet needs within the GBHMA.
- Option C: A contribution of 4,000 dwellings towards unmet needs within the GBHMA.
- Option D: A contribution of 12,000 dwellings towards unmet needs within the GBHMA.
- Option E: A contribution of 20,000 dwellings towards unmet needs within the GBHMA.

14. The contributions proposed in options C to E were approximately based on the findings of the GBHMA Strategic Growth Study (February 2018) which identified three areas of search within South Staffordshire that could potentially help to address unmet need within the HMA, namely:

- North of Wolverhampton / i54: An Employment-led Strategic Development of between 1,500 and 7,500 dwellings.
- North of Penkridge: An Urban Extension of between 1,500 and 7,500 dwellings.
- To the north of Codsall/Bilbrook: An area for the proportionate dispersal of between 500 and 2,500 dwellings.

15. Option C was based on the three areas delivering towards the lower end of their potential capacities, while Option E was based on the three areas delivering towards the upper end of their potential capacities. In the Issues and Options Paper, the Council identified Option C (a 4,000 dwelling contribution) as its preferred level of future growth (the minimum capacity of the three combined areas of search). This level of contribution has been carried forward to the Preferred Options Consultation Document. This is confirmed at paragraphs 5.5 and 5.6 of the Duty to Cooperate Paper (November 2021) which states (section underlined for emphasis):

*“To date the Council has used the GBHMA Strategic Growth Study recommendations as the basis for its contributions to unmet GBHMA housing needs, seeking to ensure the emerging housing target is proportionate to the findings of that study. It has also repeatedly communicated its use of the study in setting its housing target to other authorities in the GBHMA since the Issues and Options consultation in 2018, including as recently as June 2021 correspondence with all neighbouring and GBHMA authorities. This has been done to allow the opportunity for other authorities to interrogate the Council’s position and to offer comments on how the approach may be refined or altered.*”

*To date there has been broad support for South Staffordshire’s housing target from many local authorities across the GBHMA, including from both Birmingham and the Black Country. Whilst not all local authorities in this area are adopting the same approach as South Staffordshire in addressing the GBHMA Strategic Growth Study’s recommendations, no Duty to Cooperate body has yet suggested the use of an alternative GBHMA-wide evidence base to replace this study. To address this the Council will continue to engage with other local authorities through the Duty to Co-operate to ensure these strategic growth locations are delivered through local plans or are offset by more sustainable alternative site proposals that may arise through the local plan preparation process. The District Council has also indicated to Birmingham City Council earlier this year that there may be a need for an update to this study in response to increased development pressures that could emerge from the Birmingham Development Plan review and will continue to be an active participant in any cross-boundary evidence to address this issue, as and when the opportunity emerges.”*

16. While it is commendable that the Council is proposing to accommodate an element of the unmet GBHMA need it is important to highlight that the level collaboration with the other GBHMA authorities to-date falls well short of the requirements of the Duty to Cooperate as set out in both the NPPF and Planning Policy Guidance (‘PPG’). As set out above paragraph 27 of the NPPF requires a Statement(s) of Common Ground (SOCG) to be agreed with neighbouring authorities to be produced and made publicly available throughout the plan-making process. In contrast, it is clear from the Duty to Cooperate Paper that no SOCG’s have been prepared and that some of the authorities within the GBHMA are taking a different approach in respect of unmet need. As such there is no certainty that the level of contribution proposed by the Council is sufficient.

17. This matter needs to be addressed in a comprehensive manner through the preparation of a SOCG, signed by all GBHMA authorities, which confirms both the level of unmet need in the HMA and how it is to be apportioned. Until a SOCG is in place it is premature for the Council to set out the preferred options for their emerging Local

Plan as there is no certainty that the quantum of housing for which they are planning is sufficient. Should the Council decide to continue with the plan-making process regardless, it will undoubtedly be found unsound on the basis that it has not been ‘positively prepared’, which paragraph 35 a) of the NPPF defines as (underlined for emphasis):

*“providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development”*

### **South Staffordshire Housing Market Assessment (May 2021)**

18. These comments on the Strategic Housing Market Assessment (SHMA) are limited to the Section 4 (Overall Housing Need) and relate to the following:

1. The calculation made using the Standard Methodology for Assessing Local Housing Need
2. The section on ‘Addressing Housing Need from outside South Staffordshire

19. In respect of the first point the minimum housing requirement for the District is calculated using the Standard Methodology for Assessing Local Housing Need (‘Standard Method’) at section 4 of the report. Despite being published in May 2021 the calculation uses an out-of-date affordability ratio (updated ratios were published in March 2021). This results in an incorrect annual minimum housing requirement of 254 dwellings per annum. It is acknowledged that the issue appears to have been identified by the Council as the Preferred Options Consultation Document actually refers to the correct annual minimum housing requirement of 243 dwellings per annum. However, the SHMA needs to be updated to address this error and ensure that it is robust.

20. In respect of the second point the SHMA acknowledges that, in accordance with the NPPF and PPG, an uplift is required to address unmet housing need arising in the GBHMA. However, at paragraph 4.17 it simply advises that:

*“As discussed in Chapter 1 (paragraph 1.3), the Council is intending to help meet the unmet housing need arising in the Greater Birmingham Housing Market Area and is preparing to provide 4,000 new homes over the plan period to do this.”*

21. There is no explanation as to how the 4,000 dwelling figure was reached or whether it is considered to be robust. In this respect para 010 (Reference ID: 2a-010-20201216) of the PPG states that uplifts may be required where:

*“an authority agrees to take on unmet need from neighbouring authorities, as set out in a statement of common ground”*

22. As set out above there is no SOCG in place with the GBHMA authorities, while the 4,000 dwelling figure represents the minimum capacity of the three combined areas of search identified by the GBHMA Strategic Growth Study (February 2018). As such there is no certainty that the level of contribution proposed by the Council is sufficient to meet the unmet need. To rectify this deficiency the authorities within the GBHMA need to prepare a SOCG which confirms both the level of unmet need in the HMA and how it is to be apportioned.

### **Infrastructure Delivery Plan (September 2021)**

23. The Infrastructure Delivery Plan (‘IDP’) has been prepared on the basis of the quantum of development proposed in the Preferred Options Consultation Document. However, as set out above in respect of the Duty to Cooperate Paper and the SHMA there is considerable uncertainty regarding the overall housing requirement that can only be resolved through the preparation of SOCG between the GBHMA authorities. The IDP will therefore need to be reviewed once the overall housing requirement for the District has been agreed.

24. Notwithstanding the above it is noted that the IDP states the following in respect of highways and transport:

*"The Council has maintained an ongoing dialogue with officers from Staffordshire County Council (SCC) to discuss concerns around highway capacity and congestion, EV charging and opportunities for active travel. In September 2018 discussions revealed that there were currently very limited highways modelling available for South Staffordshire."* (paragraph 5.20)

*"In June 2019, officers also met with Highways England (HE) to discuss the evidence base that is needed to assess the impact on the Strategic Road Network, for which they are responsible. HE revealed that traffic modelling will be required for the northern part of the district around the A449/M54 corridors. Similar to appraising the local network, the scope of this work is dependent on the site-specific locations of planned strategic development. SCC have been working closely with HE to determine a proportionate approach that ensures impact on the Strategic Road Network are considered through the plan and can inform the highway infrastructure improvements that are needed to support development. The approach agreed, was to use a version HE's M54 - M6 SATURN model that was developed for the M54/M6 link road DCO. In June 2021 a methodology for its use was agreed between HE and SCC that would forecast routes taken by traffic generated from the proposed South Staffordshire allocation sites and the estimated quantity of traffic within the periods modelled. Engagement with City of Wolverhampton Council has taken place in developing the approach, with the output being advice to identify distribution of trips from new development to junctions in the surrounding (including cross boundary) in order to identify which specific junctions will require upgrades/mitigation as a result of the new development. This information will then be shared with the promoters of the preferred sites to ensure these junctions are scoped into their Transport Assessments (TAs) and will identify the required mitigation (to be agreed with HE/SCC). These highway improvements will then need to 'plug in' to the Council's Local Plan Viability Study as essential development costs."* (paragraph 5.22)

25. The above text indicates that the Council's preferred options have been developed without regard to highways modelling, which is either minimal (local highway network) or in the process of being prepared (strategic highway network). This is not only a risky approach (the modelling may identify the need for significant and costly improvements), but also contrary to PPG which states the following at paragraph 059 (Reference ID: 61-059-20190315) which states:

*"At an early stage in the plan-making process strategic policy-making authorities will need to work alongside infrastructure providers, service delivery organisations, other strategic bodies such as Local Enterprise Partnerships, developers, landowners and site promoters. A collaborative approach is expected to be taken to identifying infrastructure deficits and requirements, and opportunities for addressing them. In doing so they will need to:*

- assess the quality and capacity of infrastructure, and its ability to meet forecast demands. Where deficiencies are identified, policies should set out how those deficiencies will be addressed; and*
- take account of the need for strategic infrastructure, including nationally significant infrastructure, within their areas."*

26. As set out above, issues relating to Duty to Cooperate and overall housing requirement need to be addressed in a comprehensive manner through the preparation of a SOCG, signed by all GBHMA authorities, which confirms both the level of unmet need in the HMA and how it is to be apportioned. Due to the number of authorities involved this is a task that is likely to take some time and require the plan-making process to be paused. It is strongly recommended that the Council use this time to undertake the modelling that is required so that, when the overall housing requirement is confirmed, they are in a position to properly assess the impact of the development that is required to do so. Failure to undertake the modelling will likely result in the Local Plan being found unsound on the basis that it is not 'justified' (i.e. based on proportionate evidence).

### **South Staffordshire Green Belt Study - Stage 1 and 2 Report (July 2019)**

27. The primary concern with the Green Belt Study relates to the assessment of land to the north of Bilbrook. Below are extracts from Appendix 3 of the Study which assign a harm rating to parcels of land in the event that they

were released for development. For the purposes of clarity, a red line has been added to the plans to highlight the boundary of the Land South of Pendeford Hall Lane, Bilbrook.

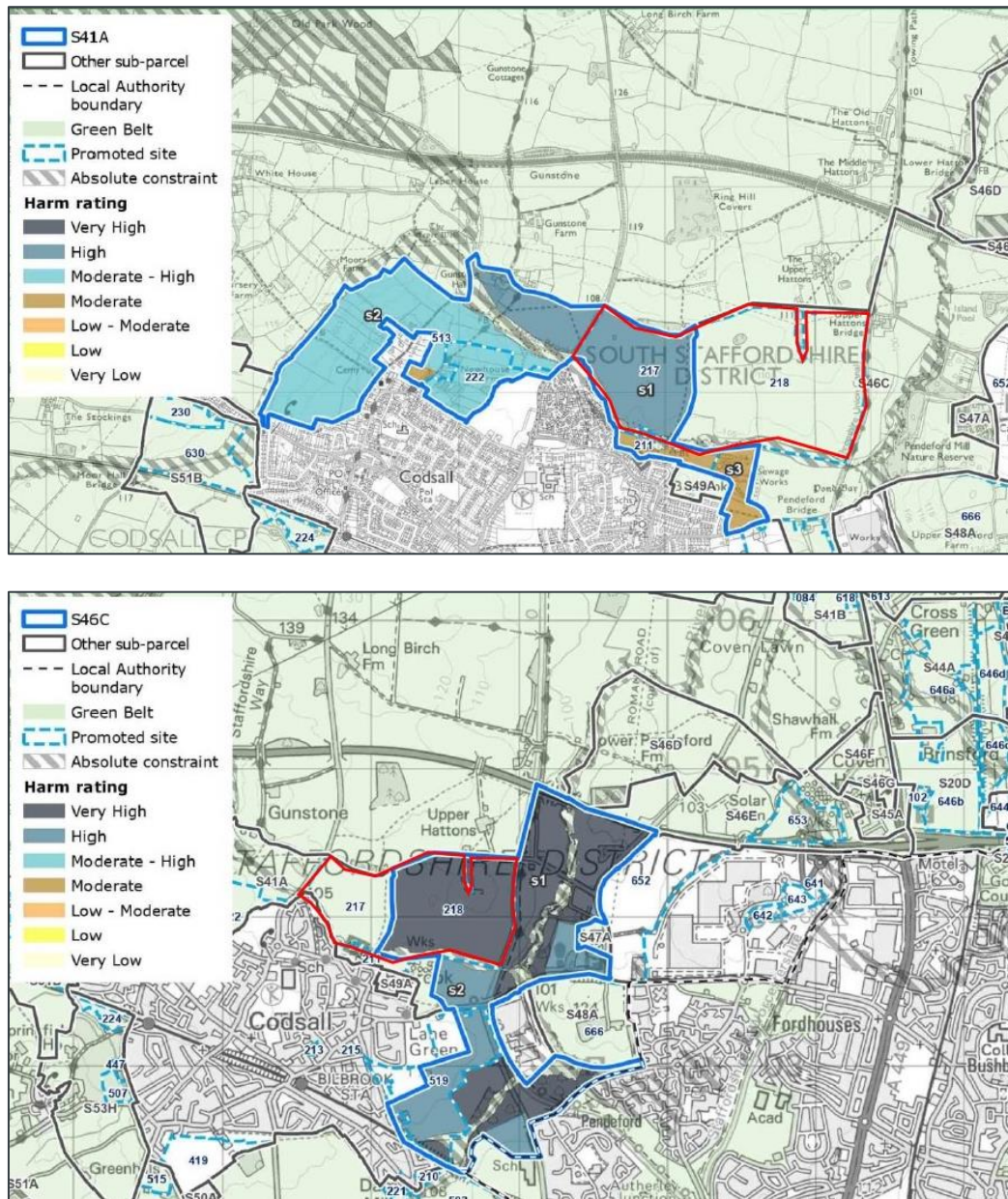


Figure 1: Map Extracts from the South Staffordshire Green Belt Study - Stage 1 and 2 Report (July 2019)

28. The plans show that the western half of the site is assigned a harm rating of ‘High’, while the eastern half of the site is assigned a harm rating of ‘Very High’. In contrast, the majority of the land directly to east of the settlement, which forms the gap between Bilbrook and Wolverhampton is only assigned a rating of ‘High’. This seems illogical, but it may be that the ‘Very High’ rating for the eastern part of the site is due to it being considered alongside the land to the east of the Staffordshire Union Canal.
29. On the basis of the above it is strongly recommended that the Study is reviewed and that the Stage 2 Assessments are amended to consider specific sites rather than wider parcels of land. To aid this process the tables below contain an initial assessment of the Land South of Pendeford Hall Lane against the criteria set out in the methodology section of the Study.

### Step 1: Consider Stage 1 contribution ratings in more depth

Purpose	Commentary	Score
1. Check the unrestricted sprawl of large built-up area	The site lies to the north of Bilbrook, while the Wolverhampton and the West Midlands conurbation lies to the south-east of the settlement.	Weak / No Contribution
2. Prevent neighbouring towns from merging	There are no settlements to the north of Bilbrook for some distance. The eastern boundary of the site is formed by the Staffordshire Union Canal, beyond which lies the Pendeford Mill Nature Reserve and the River Penk.	Weak / No Contribution
3. Assist in safeguarding the countryside from encroachment	The land has the characteristics of open countryside.	Strong Contribution
4. Preserve the setting and special character of historic towns	The Study notes that no towns within the District were identified as being historic.	Weak / No Contribution
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land	The Study notes that all areas of Green Belt perform strongly against this purpose.	Strong Contribution

### Step 2: Assess potential impact of release on the integrity of the remaining Green Belt

Criteria	Commentary
1. Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?	No. The site lies to the north of Bilbrook, while the Wolverhampton and the West Midlands conurbation lies to the south-east of the settlement.
2. How strong would the remaining settlement gap be if the Green Belt land were released? In order to answer this question consideration must be given to the size of the gap, the role of constraints and the location of separating and connecting features.	<p>The settlement gaps to the north and east would remain strong.</p> <p>Wolverhampton (to the east): The eastern boundary of the site is formed by the Staffordshire Union Canal. The Pendeford Mill Nature Reserve and the River Penk fall between Bilbrook and the edge of the city.</p> <p>Brewood (to the north): The northern boundary of the site is approximately 3.8km from Brewood.</p>

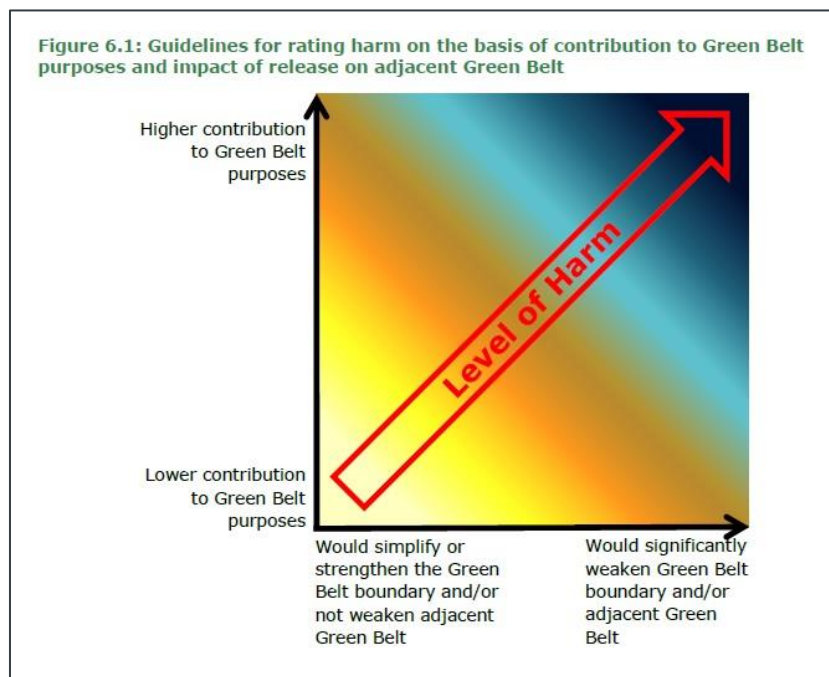
Criteria	Commentary
3. Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside? Unless detailed development proposals are being considered the urbanising influence of future development is difficult to judge, so it is assumed that land beyond a new boundary that currently makes a significant contribution to Purpose 3 will continue to make a significant contribution to Purpose 3.	A masterplan for the site is included in the Vision Document at <b>Appendix 2</b> . The northern boundary of the site is formed by Pendeford Hall Lane and could be reinforced with new landscaping to ensure that the land to the north remains rural in character.

**Step 3: Assess overall Green Belt harm**

30. The methodology for assessing harm is set out in Chapter 6 of the Study and uses the following scale:

- Very High Harm
- High Harm
- Moderate-High Harm
- Moderate Harm
- Low-Moderate Harm
- Low Harm
- Very Low Harm

31. Figure 6.1 of the Study is reproduced below and provides an illustration on how to rate the level of harm that would be caused by release of an area of Green Belt.



**Figure 2: Extract from the South Staffordshire Green Belt Study - Stage 1 and 2 Report (July 2019)**

32. The tables above conclude that Land South of Pendeford Hall Lane strongly serves two of the Green Belt purposes, but that its release for development would not impact the integrity of the remaining Green Belt. On this basis it is considered that releasing the site for development would result in ‘Moderate-High’ Harm. This



conclusion is supported by the findings of the GBHMA Strategic Growth Study (February 2018) which, when identifying land to the north of 'Codsall / Bilbrook' as an area of search for the proportionate dispersal of between 500 and 2,500 dwellings, stated:

*"There would be a limited likely significant strategic effect in this location, being part of edge-of-conurbation development, which is generally well contained. There are containment (and local separation) issues to the east of Codsall (as both opportunities and challenges) which would have to be considered as part of any detailed local assessment."* (paragraph 8.121)

### Strategic Housing & Economic Land Availability Assessment 2021

33. The primary concern with Strategic Housing & Economic Land Availability Assessment 2021 (SHELAA) relates to the assessment of Land South of Pendeford Hall Lane. The site is split into two parcels, with the western parcel given the reference 217 and the eastern parcel given the reference 218. An assessment of both parcels is included at Appendix 3 of the SHELAA and concludes that they are 'Not Suitable' on the following basis:

*"The site is disassociated from Bilbrook village development boundary and separated from settlement by a defensible boundary (Brook), and no pedestrian access to village has been demonstrated by site owner. Part of site within Flood Zone 3. Reduced area of 22.8ha reflects this. PRoW runs through site. Site modelled at 32 dwellings per hectare."* (Site 217)

*"The site is disassociated from Bilbrook village development boundary. Part of site within Flood Zone 3. Reduced area of 51.96ha ha reflects this. Site modelled at 32 dwellings per hectare."* (Site 217)

34. The definition of what is meant by 'disassociated from a village development boundary' is set out in footnote 6 on page 14 of the SHELAA. It states:

*"A site is considered disassociated from a village development boundary when it is not directly adjacent to it. On a case-by-case basis, it may be appropriate to consider a site not directly adjoining a development boundary as a 'potentially suitable' extension to a village/urban area where the site is a short distance from the host settlement and a legible and safe pedestrian route and means of access to the host settlement can be demonstrated by the site promoter."*

35. In respect of the above the following should be noted:

- It is acknowledged that the Land South of Pendeford Hall Lane is not directly adjacent to the currently adopted development boundary. However, as can be seen from the SHELAA Map Extract at **Appendix 3**, the south-western boundary of the site runs parallel to the current development boundary and is only separated by a matter of metres. This is a similar position to the Sites 224 and 419, both of which were not discounted on that basis and which are proposed allocations in the Preferred Options Document.
- The footnote on page 14 of the SHELAA confirm that as site that is within a short distance from the host settlement could be considered where *"a legible and safe pedestrian route and means of access to the host settlement can be demonstrated by the site promoter"*. As acknowledged in the assessment for Site 217 a Public Right of Way (PROW) runs through the site and provides a connection to the village (the plan at **Appendix 4** shows the exact route). Further information is included in the Vision Document at **Appendix 2** which highlights that:
  - There is scope for a range of improvements to the PROW, including a new wider bridge over Moat Brook incorporating level access, increasing the width of the footpath, the provision of low-level lighting and improvements to surfacing.
  - A new pedestrian footway would be provided along the eastern side of Watery Lane. This would provide a safe pedestrian route between the main site access and the village.

36. On the basis of the above, it is clear that the Land South of Pendeford Hall Lane has been unjustifiably dismissed as 'Not Suitable' which has, in turn, excluded it from consideration as a potential allocation in the Housing Site

Selection Topic Paper and other subsequent evidence base documents (discussed further below). This needs to be rectified as a matter of urgency to ensure that the evidence base underpinning the emerging Local Plan is robust and considers reasonable alternatives. Failure to address this error would inevitably result in the Local Plan being found unsound on the basis that it is not ‘justified’, one of the four tests of soundness set out in the NPPF.

### Housing Site Selection Topic Paper (September 2021)

37. The Housing Site Selection Topic Paper summarises which sites are proposed for housing in the Preferred Options Consultation Document and which are not, and includes summary reasons for the decisions that have been made. The sites shortlisted for assessment in the Topic Paper are those deemed to be ‘Suitable’ or ‘Potentially Suitable’ in the SHELAA. However, as set out above:
- The SHELAA incorrectly applied its own site assessment criteria when considering the Land South of Pendeford Hall Lane, resulting the site being deemed ‘Not Suitable’ for development and excluding it from consideration.
  - A proper application of the site assessment criteria, in combination with the information provided in the Vision Document at **Appendix 2**, confirms that the Land South of Pendeford Hall Lane is ‘Potentially Suitable’ for development.
38. On the basis of the above, the Housing Topic Paper needs to be amended to include consideration of the Land South of Pendeford Hall Lane. When undertaking this assessment, the following should be noted:
- The Topic Paper seeks to identify the number of sites required to deliver the housing requirement set out in the Preferred Options Consultation Document. However, as set out earlier in these representations the evidence underpinning the proposed housing requirement is not robust, specifically the level of unmet need that the District will deliver on behalf of the GBHMA. The main issue being the absence of a SOCG, signed by all GBHMA authorities, which confirms both the level of unmet need in the HMA and how it is to be apportioned. At present the Preferred Options Consultation Document only plans for a contribution of 4,000 dwellings which represents **the minimum** capacity of the three combined areas of search identified by the GBHMA Strategic Growth Study (February 2018).
  - As noted in both the Preferred Options Document, the Housing Site Selection Topic Paper and the Rural Services and Facilities Audit 2021 ‘Codsall / Bilbrook’ is a top tier settlement within the District. It has a wide range of convenience stores and local services and facilities, including a number of schools. It also has two railway stations and is within close proximity to both the i54 employment area and the Owens Trading Estate. As such it is identified as a suitable location for significant housing growth.
  - The GBHMA Strategic Growth Study (February 2018) identified land to the north of ‘Codsall / Bilbrook’ as an area of search for the proportionate dispersal of between 500 and 2,500 dwellings. It concluded:
 

*“There would be a limited likely significant strategic effect in this location, being part of edge-of-conurbation development which is generally well contained. There are containment (and local separation) issues to the east of Codsall (as both opportunities and challenges) which would have to be considered as part of any detailed local assessment.”* (paragraph 8.121)
  - The assessment of the Land South of Pendeford Hall Lane in the South Staffordshire Green Belt Study - Stage 1 and 2 Report (July 2019) is significantly flawed (see paragraphs 28 to 33 above). As such the level of harm that would result from development of the site should be reduced to ‘Moderate-High’.
  - A detailed account of the potential ‘Site Opportunities’ is set out in the Vision Document at **Appendix 2**. In addition to the delivery of approximately 1,200 homes the proposals include 1 no. 2 form entry primary school and a local centre/transport hub, as well as the provision of LEAP’s, NEAP’s, a MUGA, sports pitches, allotments, allotments, a community orchard and a new wildlife area.

**Sustainability Appraisal of the South Staffordshire Local Plan Review - Preferred Options Plan (August 2021)**

39. The Sustainability Appraisal has been prepared by Lepus Consulting on behalf of the Council. Paragraph E7 of the Sustainability Appraisal states:

*"The purpose of this report is to appraise the sustainability performance of all potential site allocations for housing, employment and Gypsy, Travellers and Travelling Showpersons (GTTS) pitches (called 'reasonable alternatives' in Sustainability Appraisal) put forward in the Preferred Options Plan. The reasonable alternatives are assessed in relation to each objective in the SA Framework. The SA process informs the Council's evaluation of site and policy choices, amongst other factors, and seeks to improve the sustainability of the emerging Local Plan."*

40. Vistry has no objection to the manner in which the proposed allocations and 'reasonable alternatives' put forward by the Council have been assessed. However, as set out earlier in these representations there are significant flaws with a number of key documents in the evidence base that underpin the strategy and policies that are contained in the Preferred Options Consultation. For the purposes of the Sustainability Appraisal the key issues are:

1. The evidence underpinning proposed housing requirement is not robust, specifically the level of unmet need that the District will deliver on behalf of the GBHMA. As such there is no certainty that the level of growth and number of allocations proposed in the Preferred Options Consultation Document is sufficient.
2. The 'reasonable alternatives' considered in the Sustainability Appraisal are taken from the Housing Site Selection Topic Paper, which in turn was informed by the SHELAA. However, as set out above SHELAA has incorrectly applied its own site assessment criteria in respect of at least one site, resulting in it being deemed 'Not Suitable' for development and excluding it from consideration in both the Housing Site Selection Topic Paper and Sustainability Appraisal.

41. The above issues mean that the Sustainability Appraisal has not been able to consider all reasonable alternatives, a requirement of the NPPF, PPG and the Environmental Assessment of Plans and Programmes Regulations 2004. This can be resolved by re-rerunning the Sustainability Appraisal once both the Preferred Options Consultation Document and associated evidence base have been amended.

**QUESTION 2:**

**(A) DO YOU AGREE THAT THE CORRECT INFRASTRUCTURE TO BE DELIVERED ALONGSIDE PROPOSED SITE ALLOCATIONS BEEN IDENTIFIED IN THE IDP? YES/NO**

42. As set out above in respect of the IDP, it is noted that that the Council's preferred options have been developed without regard to highways modelling, which is either minimal (local highway network) or in the process of being prepared (strategic highway network). Until the modelling is complete it is not possible to confirm whether or not the highway infrastructure that is proposed to support the allocation is sufficient.

**(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**

43. The Vision Document for Land South of Pendeford Hall Lane, Bilbrook, at **Appendix 2**, describes the proposals in detail and confirms the infrastructure that would be delivered as part of the proposed development. This includes include 1 no. 2 form entry primary school and a local centre/transport hub, as well as the provision of LEAP's, NEAP's, a MUGA, sports pitches, allotments, allotments, a community orchard and a new wildlife area.

**QUESTION 3:**

**A) HAVE THE CORRECT VISION AND STRATEGIC OBJECTIVES BEEN IDENTIFIED? YES/NO**

44. The vision is extremely vague and does not refer to anything that is specific to South Staffordshire. This is demonstrated by the fact that ‘South Staffordshire’ could be replaced by the name of any other rural authority and the vision would be relevant to that area without the need for any further amendments. An area specific vision should refer to existing problems and state that they will have been resolved, and to existing successes and state that they will have been built upon. For example, reference should be made to role that the District will have played in helping to deliver housing on behalf of the wider GBHMA.

**B) DO YOU AGREE THAT THE DRAFT POLICIES (CHAPTERS 4 AND 5) AND THE POLICY DIRECTIONS (CHAPTER 6) WILL DELIVER THESE OBJECTIVES? YES/NO**

45. No. There are significant flaws with a number of key documents in the evidence base that underpins the overall housing requirement and the spatial strategy set out in chapter 4 and 5 of the Preferred Options Consultation. The key issues are:

1. The requirements of the Duty to Cooperate as set out in the NPPF and PPG have not been met. As a result, there is no certainty that the level of unmet need that the District proposes to deliver on behalf of the GBHMA is sufficient or that enough sites have been allocated.
2. The SHELAA has incorrectly applied its own site assessment criteria in respect of at least one site, resulting in it being deemed ‘Not Suitable’ for development and excluding it from consideration in the Housing Site Selection Topic Paper which identified the allocations that are proposed in the Preferred Options Consultation Document. As such there has not been a proper consideration of ‘reasonable alternative’, a requirement of the NPPF, PPG and the Environmental Assessment of Plans and Programmes Regulations 2004.

46. The first issue needs to be addressed in a comprehensive manner through the preparation of a SOCG, signed by all GBHMA authorities, which confirms both the level of unmet need in the HMA and how it is to be apportioned. Once this has been established a revised Preferred Options Document can be brought forward for consultation.

47. It is appreciated that agreeing a SOCG between the fourteen GBHMA authorities is likely to take some time and will require the plan-making process to be paused. However, the time can be used productively to address the flaws that have been identified in respect of a number of the key evidence base documents (see response to question 1).

48. To resolve the second issue, a review of the 2021 SHELAA needs to be undertaken to establish whether any other sites have been incorrectly deemed to be ‘Not Suitable’ for development. Once the review has been completed, and the housing requirement robustly established through a GBHMA-wide SOCG, an amended version of the Housing Site Selection Topic Paper will need to be prepared. Key points for consideration during that exercise include:

- ‘Codsall / Bilbrook’ is a top tier settlement within the District. It has a wide range of convenience stores and local services and facilities, including a number of schools. It also has two railway stations and is within close proximity to both the i54 employment area and the Owens Trading Estate. As such it is identified as a suitable location for significant housing growth.
- The GBHMA Strategic Growth Study (February 2018) identified land to the north of ‘Codsall / Bilbrook’ as an area of search for the proportionate dispersal of between 500 and 2,500 dwellings. It concluded:

*“There would be a limited likely significant strategic effect in this location, being part of edge-of-conurbation development which is generally well contained. There are containment (and local separation) issues to the east of Codsall (as both opportunities and challenges) which would have to be considered as part of any detailed local assessment.” (paragraph 8.121)*

- The proposals for the Land South of Pendeford Hall Lane, Bilbrook are set out in detail in the Vision Document at **Appendix 2**. In addition to the delivery of approximately 1,200 homes the proposals include 1 no. 2 form entry primary school and a local centre/transport hub, as well as the provision of LEAP's, NEAP's, a MUGA, sports pitches, allotments, allotments, a community orchard and a new wildlife area.

**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?**

49. Vistry welcome the recognition in Policy DS1 that Green Belt boundaries will need to be altered to accommodate the development allocations that are required within the District.

**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?**

50. No. Please see our response to Question 3(B).

**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?**

51. These representations focus on questions of particular relevance to the overall housing requirement and the proposed spatial strategy. Vistry reserve the right to comment on other matters, such as this, at future consultation stages.

**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.**

52. No. Please see our response to Question 3(B).

**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**

53. These representations focus on questions of particular relevance to the overall housing requirement and the proposed spatial strategy. Vistry reserve the right to comment on other matters, such as this, at future consultation stages.

**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.**

54. These representations focus on questions of particular relevance to the overall housing requirement and the proposed spatial strategy. Vistry reserve the right to comment on other matters, such as this, at future consultation stages.

**QUESTION 9:**

**A) DO YOU SUPPORT THE PROPOSED PITCH ALLOCATIONS IN POLICY SA6? YES/NO  
PLEASE REFERENCE THE SITE REFERENCE NUMBER (E.G SS001) FOR THE SITE YOU ARE COMMENTING ON IN YOUR RESPONSE.**

55. These representations focus on questions of particular relevance to the overall housing requirement and the proposed spatial strategy. Vistry reserve the right to comment on other matters, such as this, at future consultation stages.

**B) IS THERE ANOTHER OPTION FOR MEETING OUR GYPSY AND TRAVELLER NEEDS, INCLUDING ANY ALTERNATIVE SITE SUGGESTIONS THAT COULD BE CONSIDERED? YES/NO  
PLEASE PROVIDE DETAILS, INCLUDING A PLAN FOR NEW SITE SUGGESTIONS**

56. These representations focus on questions of particular relevance to the overall housing requirement and the proposed spatial strategy. Vistry reserve the right to comment on other matters, such as this, at future consultation stages.

**QUESTION 10:**

**DO YOU SUPPORT THE PROPOSED ALLOCATION IN POLICY SA7? YES/NO**

57. These representations focus on questions of particular relevance to the overall housing requirement and the proposed spatial strategy. Vistry reserve the right to comment on other matters, such as this, at future consultation stages.

**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).**

58. These representations focus on questions of particular relevance to the overall housing requirement and the proposed spatial strategy. Vistry reserve the right to comment on other matters, such as this, at future consultation stages.

**QUESTION 12:**

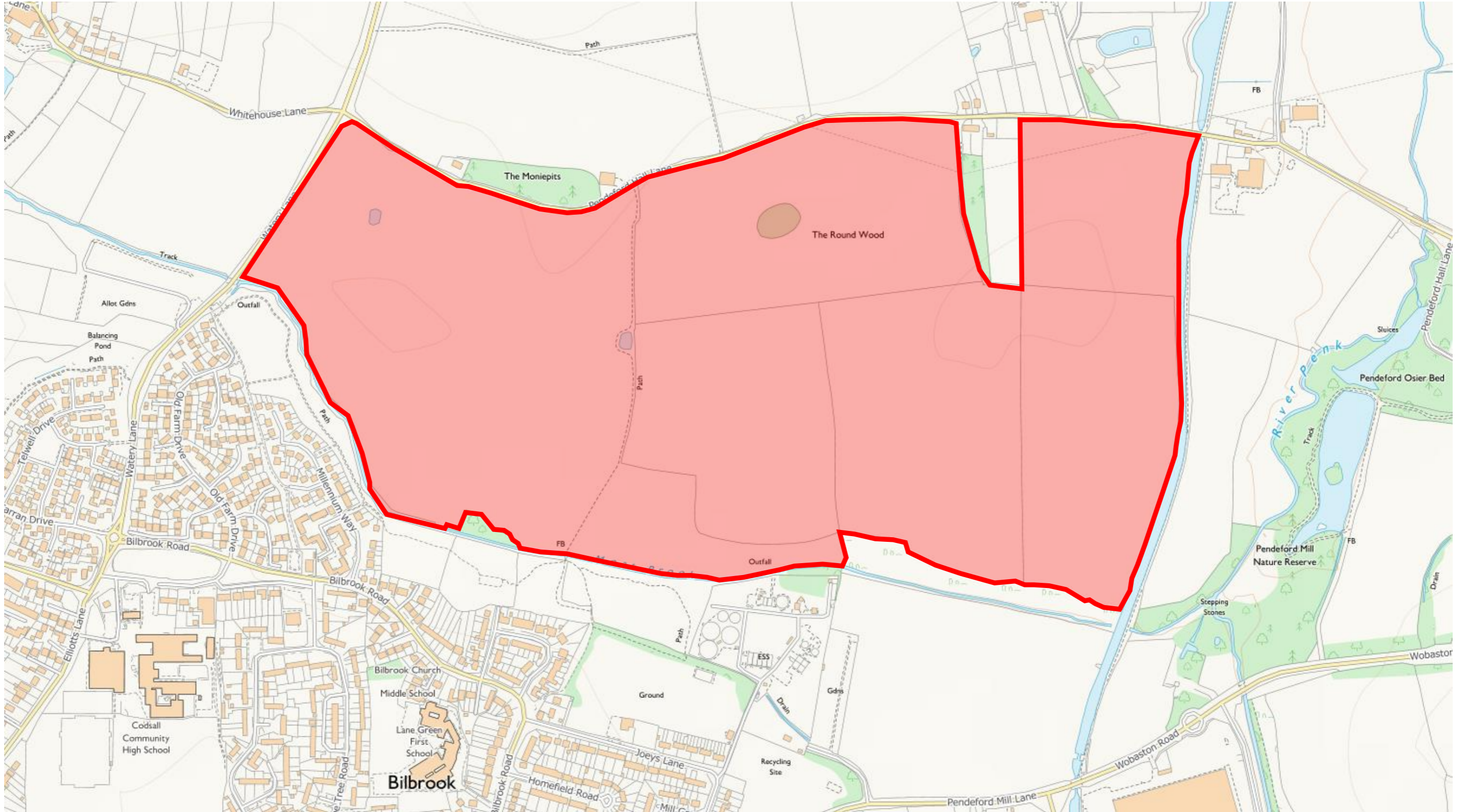
**A) IT IS PROPOSED THAT THE FULLY DRAFTED POLICIES IN THIS DOCUMENT (POLICIES DS1-DS4 AND SA1-SA7) ARE ALL STRATEGIC POLICIES REQUIRED BY PARAGRAPH 21 OF THE NPPF. DO YOU AGREE THESE ARE STRATEGIC POLICIES? YES/NO**

59. These representations focus on questions of particular relevance to the overall housing requirement and the proposed spatial strategy. Vistry reserve the right to comment on other matters, such as this, at future consultation stages.

**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)**

60. These representations focus on questions of particular relevance to the overall housing requirement and the proposed spatial strategy. Vistry reserve the right to comment on other matters, such as this, at future consultation stages.

## APPENDIX 1: SITE LOCATION PLAN





## APPENDIX 2: VISION DOCUMENT

LAND SOUTH OF PENDEFORD  
HALL LANE, BILBROOK

# VISION DOCUMENT

Vistry Group



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# VISION STATEMENT

The Site at South of Pendeford Hall Lane will provide a well-designed, distinctive neighbourhood where people will want to live, work and play.

An accessible landscape framework will connect places and spaces, and incorporate new sports and recreation provision, whilst delivering more than 10% biodiversity net gain on-site.

The new neighbourhood will be centred around a new 2 form entry primary school and local centre. The local centre will incorporate a Mobility Hub, which will provide a more convenient, comfortable, and safer environment to access a range of sustainable transport modes.

The new neighbourhood will stand the test of time, meeting the needs of current and future generations.

# 01. INTRODUCTION

## 1.1 DOCUMENT OVERVIEW

This Vision Document has been prepared on behalf of Vistry Group. It promotes the potential development of Land South of Pendeford Hall Lane, Bilbrook (the Site).

The Vision Document is split into two parts. The first part introduces Vistry Group, providing information on their track record, company ethos and approach to delivering truly sustainable new communities. The second part of the Vision Document demonstrates how the Site could be brought forward as a comprehensively planned new community to deliver a high quality, exciting and sustainable new residential development of around 1,200 homes, one new primary school, a local centre, a Mobility Hub and a connected and accessible network of public open spaces.

Specifically, the second part of the Vision Document does this by setting out:

- **An understanding of the Site and its local context;**
- **A summary of current Site assessment undertaken to date; and**
- **The emerging key design principles and concept masterplan.**

# 02. PLANNING POLICY

## 2.1 PLANNING POLICY CONTEXT

In planning policy terms, the Site lies beyond the existing defined settlement boundary, in the Green Belt. Green Belt boundaries can only be altered in exceptional circumstances where justified, through the preparation or updating of local plans. South Staffordshire is in the process of updating its 2012 adopted Core Strategy, which contains broad policies for steering and shaping development as well as defining areas where development should be limited upto 2028. The emerging local plan will identify development to be delivered between 2018 and 2037 and will inevitably include a review of the green belt boundaries as part of that process.

Vistry has already responded to the first part of that review process, bringing the Site to the attention of the Council through representations to the 'Spatial Housing Strategy and Infrastructure Delivery' consultation in October 2019.

This document produced by the Vistry team provides further detail in relation to the Site and accompanies representations being made to the next stage of the review process, the 'Preferred Options' Regulation 18 consultation which runs from 1 November to 13 December 2021.

# 03. VISTRY GROUP

## 3.1 WHO WE ARE

Vistry Group was formed in January 2020 following the successful acquisition of Linden Homes and the Galliford Try Partnerships & Regeneration businesses by Bovis Homes Group PLC.

With developments from Northumberland to Cornwall and Cheshire to Norfolk, Vistry is one of the top five housebuilders in the UK by volume. As one of the country's leading housebuilders, Vistry has an established reputation for quality that runs through their homes' design, build, specification and customer service.



Meridian Water, Enfield



Winchester Village, Winchester



Public open space



White Rock, Paignton

### 3.2 WHAT WE DO

DEVELOPING  
SUSTAINABLE  
NEW HOMES AND  
COMMUNITIES  
ACROSS ALL  
SECTORS OF THE UK  
HOUSING MARKET



### 3.3 A PARTNER YOU CAN TRUST





### 3.4 TRACK RECORD AND DELIVERY



The Gateway, Bexhill, East Sussex (1,050 homes)



Steadings, Essington (231 homes)



Stanton Cross, Wellingborough (3,500 homes)



Fletcher's Rise, Wombourne (90 homes)



The Pavillions, Kenilworth

# 04. SUSTAINABILITY

## 4.1 SUSTAINABILITY STRATEGY

Vistry Group’s purpose is to deliver sustainable homes and communities across all sectors of the UK housing market.

Key to this purpose is a successful and ambitious sustainability strategy.

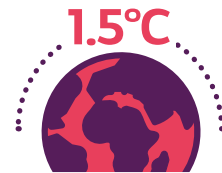
Our strategy launched in 2021 and is focussed on three priority areas of People, Operations and Homes & Communities.

It includes a commitment to setting carbon reduction targets consistent with reduction required to keep warming at 1.5°C and the development of a roadmap to deliver net zero carbon homes.

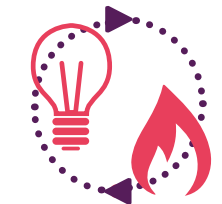
## 4.2 OUR OPERATIONS

### Climate Change

The targets covering greenhouse gas emissions from company operations are consistent with reduction required to keep warming at 1.5°C.



100% of electricity used in our offices and sites is from renewable sources.



Responsibility for climate related issues resides with Executive Leadership Team (ELT) and our COO is the executive sponsor and chairs the quarterly Group’s Sustainability Forum.



We recognise that key to success in meeting the sustainability challenges we face as a society and industry is collaboration, and to facilitate this we have become members of the UK Green Building Council, as well as corporate members of the Institute for Environmental Management and Assessment.

We continue to be gold members of the Supply Chain Sustainability School and members of the Future Homes Task Force.

## 4.3 WASTE & RESOURCES

We identify, manage and mitigate all environmental impacts through our ISO 14001 certified management system.



Waste Recycling data for 2020 resulted in an annual total of 95% recycling rate.



Procurement of only FSC/PEFC certified timber, and supporting schemes such as the National Community Wood Recycling Project, where in 2020, 686 tonnes of our timber waste was re-used.



Our ultimate priority for 2021 is to achieve a 5% reduction in waste intensity tonnes/unit whilst retaining recycling rate of over 95%.



## 4.4 OUR HOMES AND COMMUNITIES

### Placemaking

Our approach to placemaking is designed to improve people's quality of life and support our customers health and wellbeing.

Providing our customers with access to high quality amenities that support local economies is a key consideration when selecting and designing our sites and in addition to section 106 and community infrastructure contributions.



Twigworth Green, Twigworth



Netherhall Park, Great Barr

Our master planning approach aims to provide a clear hierarchy of public, private, and semi-private spaces that encourage neighbours to interact with each other and build strong communities.



The Green, Winchester Village

### Nature

Our approach to development design focusses on the principles of Green Infrastructure (GI)- networks of multifunctional green space which includes parks, open spaces, playing fields, woodlands, street trees, allotments, private gardens, sustainable drainage systems and soils.

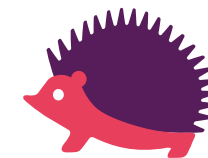
Ahead of a 10% biodiversity net gain being mandated by the emerging Environment Bill, we are seeking to assess and future-proof our schemes.



We are in partnership with the British Hedgehog Preservation Society and have formed a new partnership with the Bat Conservation Trust, to help protect these important species.



Vistry Partnerships are now business supporters of the Bumblebee Conservation Trust (BBCT). The aim of this sponsorship is to ensure our sites across the country are helping to support bumblebees and other wildlife with our planting.



## Future Homes Standard

We are currently developing the 2025 housetype range to meet the new Part L and Future Homes Standard (FHS).

We are piloting the construction of zero carbon homes on a site with Vistry Partnerships West Midlands (Europa Way Triangle, Warwick).

We are conducting extensive reviews of renewable technologies and products to ensure we offer the most technically robust solution which is right for our customers.



Unwrapped home, Emmbrook Place

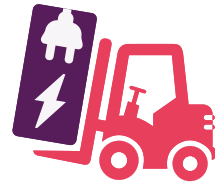


The Future Homes Standard;  
Proposed changes to Part L



Building upon its fabric-first approach, Vistry currently aims to: make its entire build process as efficient as possible;

- reduce energy demand within its homes;
- decarbonise the heating of homes;
- facilitate the use of electric vehicles;
- and provide green infrastructure at the forefront of its developments.



## 4.5 AFFORDABLE HOUSING & PLANNING OBLIGATIONS

# Vistry Partnerships

We work collaboratively with local authorities and registered providers (RPs) to provide affordable housing across a range of different tenure types.

Planning obligation spend in 2020 was £50.5m which contributes to the needs of the communities we build in.



Vistry Partnerships is the leading private sector provider of affordable housing creating 1,306 affordable homes during 2020, our product range includes one-bedroom apartments through to larger five-bedroom family homes.



# 05. A SUSTAINABLE LOCATION

## 5.1 A SUSTAINABLE SETTLEMENT

Bilbrook is one of the largest settlements in South Staffordshire and is designated as a “Main Service Village” in the adopted South Staffordshire Council Core Strategy (December 2012). The built-up area of Bilbrook is contiguous with the wider urban area of Codsall which bounds Bilbrook to the south and west. Codsall is also designated a Main Service Village in the South Staffordshire Core Strategy.

The Council’s draft Preferred Options plan (September 2021) sets out that Bilbrook/Codsall should be a focus for “significant housing growth”, together with a mix of other uses, including a new first school, local retail and strategic green infrastructure. This is in recognition of the recommendations for proportionate dispersal around Codsall/Bilbrook in the Greater Birmingham HMA Strategic Growth Study and the greater level of services and facilities in Bilbrook/Codsall, including two railway stations, which are located on the Shrewsbury to Wolverhampton line.

The Bilbrook/Codsall area has a range of convenience stores and local services and facilities, which are primarily focussed around the Pendeford Mill Lane area in Bilbrook, and the Station Road and Wolverhampton Road areas in Codsall. The area also has a number of schools, which include Bilbrook Middle School and Codsall Community High School, which are located approximately 1km and 2km respectively from the centre of the Site.

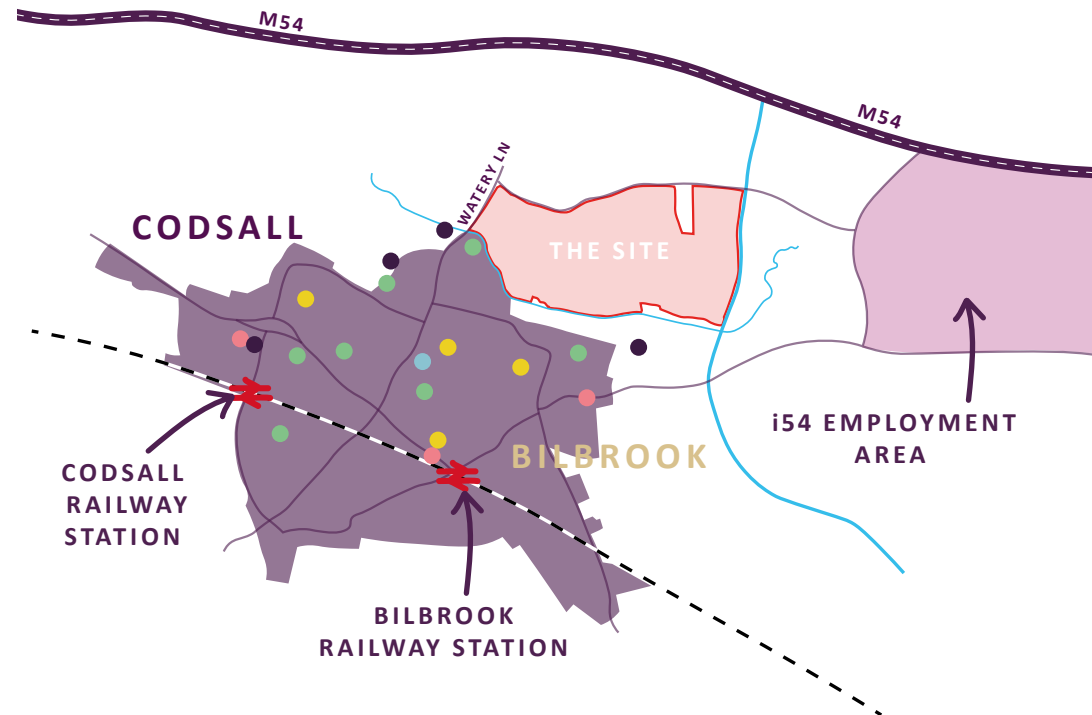
There are a large number of employment opportunities in the local area, which include the i54 employment area and Owens Trading Estate, both of which are located just to the east of the Bilbrook/Codsall area. Part of the i54 employment area is home to the Jaguar Land Rover’s Engine Manufacturing Centre, a particularly important local employer.

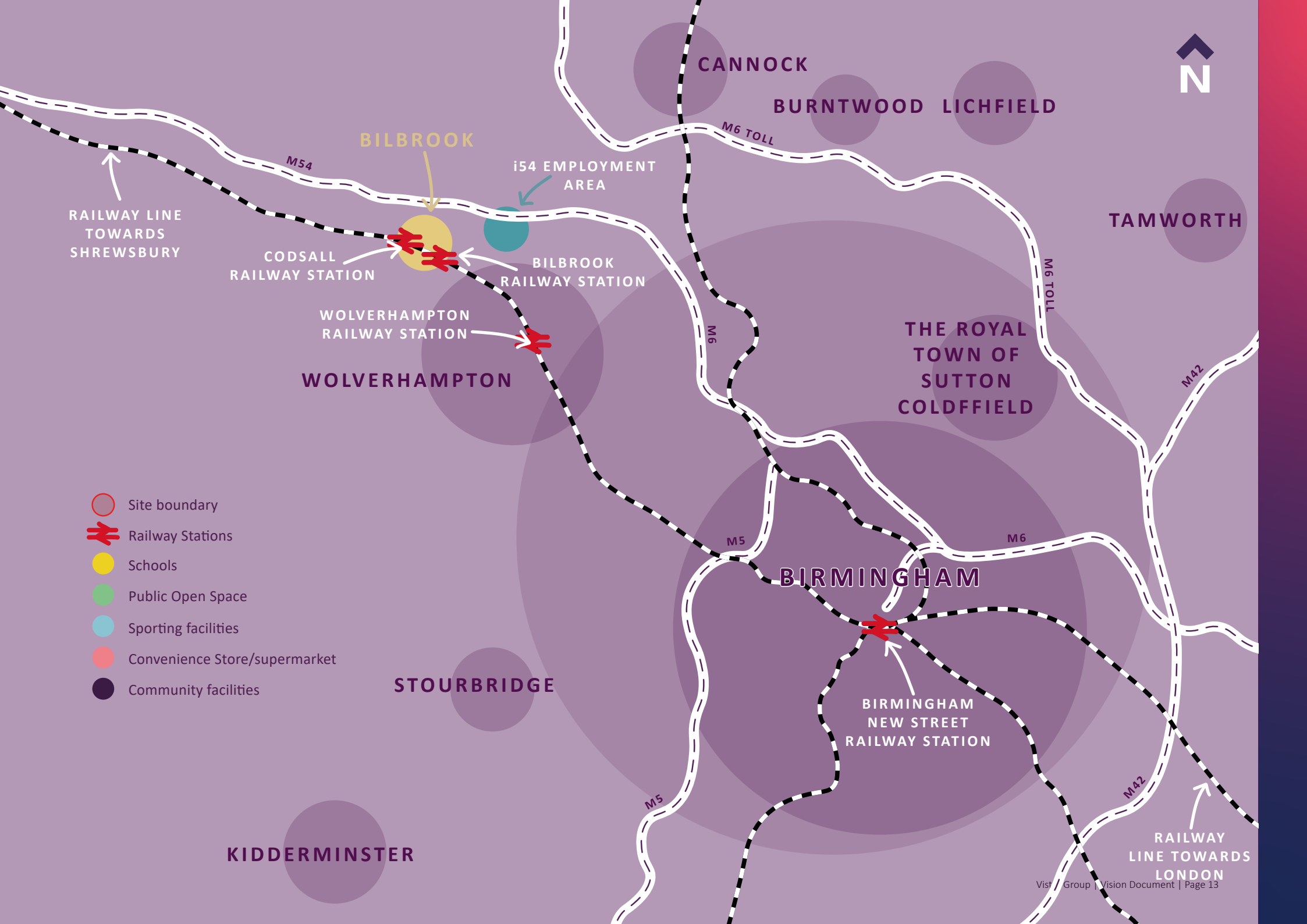
The aforementioned railway stations at Bilbrook and Codsall are typically served by hourly services 7 days a week in both directions between Birmingham New Street and Shrewsbury via Wolverhampton, with some extra trains at peak times on weekdays. Bilbrook railway station is located approximately 1.5km from the centre of the Site.

The Site has good access to the wider highway network and public transport links, and offers a sustainable and accessible location for housing growth.



View looking south across the Site, from the Public Footpath.





CANNOCK  
BURNTWOOD LICHFIELD

TAMWORTH

BILBROOK

i54 EMPLOYMENT AREA

RAILWAY LINE TOWARDS SHREWSBURY

CODSALL RAILWAY STATION

BILBROOK RAILWAY STATION

WOLVERHAMPTON RAILWAY STATION

WOLVERHAMPTON

THE ROYAL TOWN OF SUTTON COLDFIELD

-  Site boundary
-  Railway Stations
-  Schools
-  Public Open Space
-  Sporting facilities
-  Convenience Store/supermarket
-  Community facilities

STOURBRIDGE

BIRMINGHAM

BIRMINGHAM NEW STREET RAILWAY STATION

KIDDERMINSTER

RAILWAY LINE TOWARDS LONDON

## 5.2 THE SITE

The Site lies on the northern edge of Bilbrook. It is separated from the existing settlement by the mature woodland that runs along Moat Brook. It comprises six fields, five of which are in arable use and one in use for pasture. The fields are bound by near continuous, well-managed hedgerows with few gaps. Where gaps do exist, they tend to be for access between fields. Many of the hedgerows also have mature trees along them. The Site's northern and western boundaries are in the main also defined by well-managed hedgerows.

The Site's eastern boundary is partially delineated by a hedgerow and some hedgerow trees following the bank of the Shropshire Union Canal, with the rest of the boundary open along the bank of the canal.

The Site's southern boundary is delineated by the mature woodland belt which follows the course of Moat Brook. Towards the south eastern corner of the Site the trees associated with the woodland belt become less dense.

The Site's western boundary is delineated by a hedgerow and Watery Lane. Watery Lane provides a connection to the south to the existing built area of Bilbrook and Codsall.

To the north, the Site is bound by Pendeford Hall Lane, which is separated from the Site by an existing hedgerow. A block of woodland and a narrow rectangular field located south of Pendeford Hall Lane are indented into the Site boundary and lie outside of the Site.

A public footpath runs through the western part of the Site, following the hedgerow which marks the eastern boundary of the westernmost field. Approximately mid-way along this boundary there is a block of trees surrounding a pond.





PUBLIC FOOTPATH  
(BREWOOD AND COVEN 68)

PENDEFORD HALL LANE



PUBLIC FOOTPATH  
(BREWOOD AND  
COVEN 45)

THE SITE

SHROPSHIRE  
UNION CANAL



POND

PUBLIC FOOTPATH  
(BILBROOK 2)

MOAT BROOK

WWTW

ALLOTMENTS




































RECREATION  
GROUND

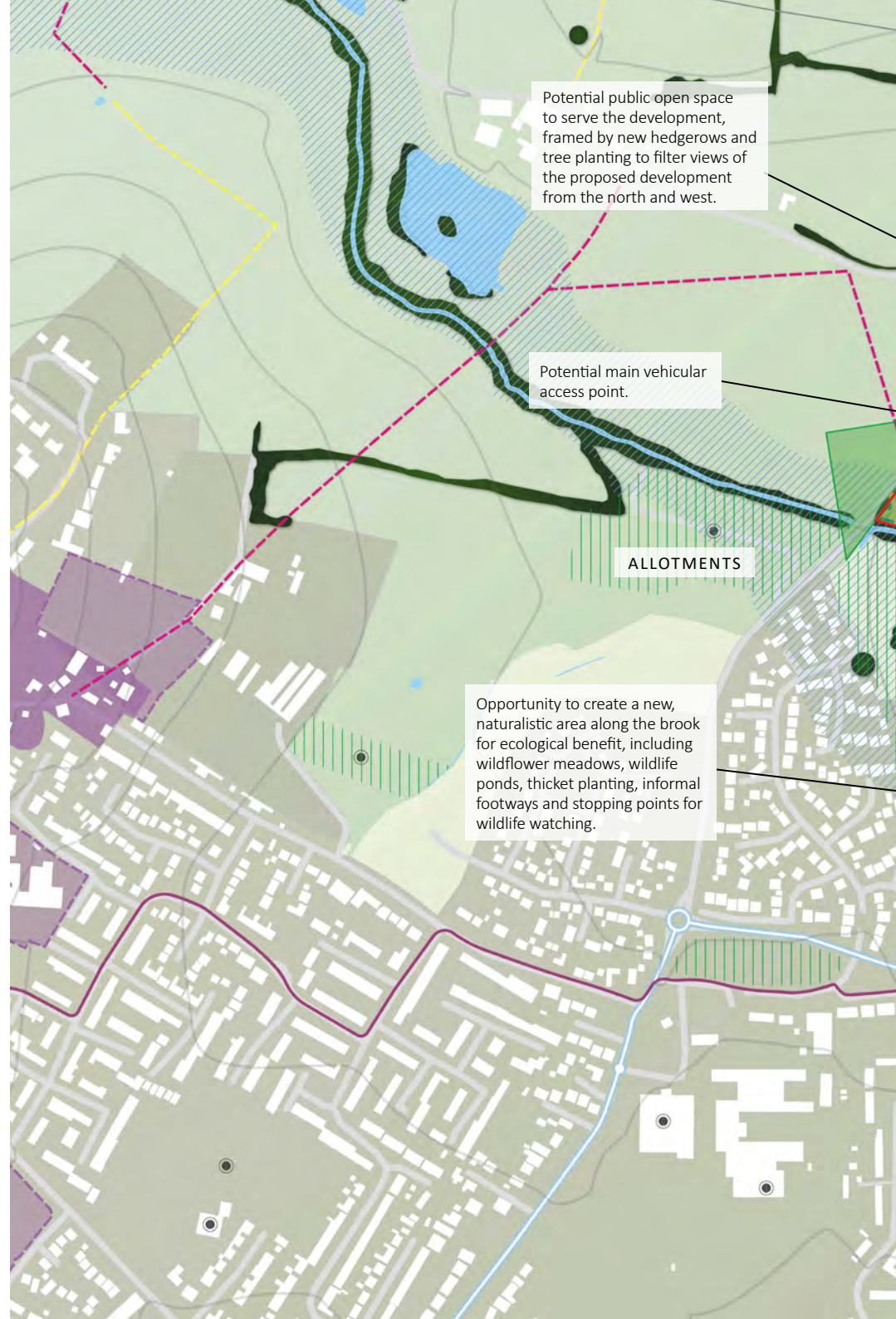
RECYCLING CENTRE



# 06. SITE CONSIDERATIONS

## Opportunities and Influences

-  Site Boundary: **Aprx. 77.39ha**
  -  Existing bus route and bus stops
  -  Existing railway line and station
  -  Existing retail centre
  -  Employment site
  -  Open space
  -  Nearby facilities
- 
- OPPORTUNITIES**
  -  Potential vehicular access point
  -  Potential secondary/emergency access point
  -  Green infrastructure
  -  Opportunity to reinforce boundary planting
  -  Potential main walking/cycling routes
  -  Potential location of Primary School
  -  Potential location of Local Centre
  -  Potential locations for drainage (SuDS) basins
  -  Potential locations for wildlife ponds
  -  Potential locations for interpretation boards
  -  Potential location for play areas (LEAP, NEAP, MUGA)
  -  Potential location for allotments
  -  Potential location for sports pitches
- 
- INFLUENCES**
  -  300m offset from waste water treatments works
  -  Contours
  -  National Cycle Route 81
  -  Public Footpaths
  -  Bridleways
  -  Bilbrook Jubilee Way
  -  Extent of flood zone
  -  Existing water features
  -  Existing trees and hedgerows
- 
- DESIGNATIONS**
  -  Green Belt
  -  Canal Conservation Area
  -  Codsall Bilbrook Oaken Conservation Area
  -  Codsall Bilbrook Oaken Conservation Area Buffer Zones
  -  Listed Buildings
- 
- UTILITIES**
  -  Low voltage overhead power lines





Potential secondary/emergency access point.

Potential location for Primary School.

Opportunity for new boundary vegetation to create a defensible Green Belt boundary.

Potential secondary vehicular access point.

Potential location for a Local Centre, together with the area of public open space, Mobility Hub, sports pitches and play areas.

Canal Conservation Area and Listed Bridge to be respected through the provision of open space, new planting and interpretation boards.

WATERY LANE

MOAT BROOK

WATER WASTE TREATEMENT AREA

Grade II Listed Shropshire Union Canal Aqueduct

SHROPSHIRE UNION CANAL

Opportunity for two new linear green corridors also accommodating recreational routes/spine streets, to run through the developable area and link with the upgraded public footpath, maximising the connectivity of the Site.

Opportunity for existing public footpath to be upgraded to a footway and cycleway to integrate development into the existing urban fabric.

Existing vegetation should form an integral part of the Site's network of new open spaces and green infrastructure.

Potential location for SuDS features.

We have already undertaken a number of technical studies on and around the Site. These studies have not identified any issues that would prevent a successful, high-quality proposal from coming forward in this location.

## 6.1 LANDSCAPE AND GREEN BELT

- The Site comprises a series of agricultural fields in arable and pastoral use separated by field boundary hedgerows, scattered hedgerow trees and a cluster of woodland in the northern central area.
- The Site is not covered by any statutory or non-statutory designations for landscape quality or character. There is a public footpath which crosses the Site north-south broadly in the centre but the remainder of the Site is not publicly accessible.
- The traffic on the M54 and surrounding roads is audible from the majority of the Site which interrupts the tranquillity of the area. The Shropshire Union Canal to the immediate east of the Site is designated as a Conservation Area and the towpath along it forms part of the Monarch's Way. The eastern part of the Site adjacent to the canal is more tranquil than the remainder of the Site.
- Overall, the landscape appraisal found that the Site is of medium landscape quality, value and sensitivity which is consistent with the Council's assessment of the area.
- The visual appraisal of the Site found that the Site is visible from the near distance to the west, north and east of the Site with filtered views available from the south. Owing to its size and vegetation on its internal field boundaries, there are no locations where the Site is visible in its entirety. However, despite its extent, the density of vegetation and undulating landform in the neighbouring landscape mean that longer distance views are limited.
- A Green Belt Assessment of the Site against the purposes in the NPPF has been undertaken. This found that the Site makes a relatively strong contribution to purpose 1 (to check the unrestricted sprawl of large built-up areas), a relatively weak contribution to purpose 2 (to prevent neighbouring towns merging into one another), a strong contribution to purpose 3 (to assist in safeguarding the countryside from encroachment), and weak/no contribution to purpose 4 (to preserve the setting and special character of historic towns).

- The proposals are for a planned strategic scale development, which will provide a new neighbourhood to the north of Bilbrook. Whilst development here would breach a well established boundary along the Moat Brook, the proposals show how a well considered development could be located here, with the Green Belt boundary defined along logical and durable features.

## 6.2 HERITAGE

- The Site is bounded to the east by the Shropshire Union Canal Conservation Area, a designated heritage asset. Development of the Site should, therefore consider the setting of the Conservation Area.
- The proposals for the Site should incorporate a large area of open space along the Canal to respect its setting. would alter the setting of a section of the conservation area.
- The Grade II listed Upper Hattons Bridge, a designated heritage asset, is located immediately north-east of the Site. The bridge carries Pendeford Hall Lane across the canal. Open space in the north eastern corner of the Site should be provided to respect its setting.
- There is potential for currently unrecorded below-ground remains of these dates to be present within the Site, but there is no evidence to suggest remains are likely to be present which would preclude development.
- The medieval settlement of Hatton may have been located within the Site. Cropmarks potentially representing below-ground remains of medieval enclosures are recorded within the Site. No extant earthworks are identified and it is likely that any below-ground remains could be appropriately dealt with by way of a programme of archaeological works.



*View looking north across the Site from the southern boundary.*

### 6.3 ECOLOGY

- The Site is dominated by arable land with grassland, woodland and ponds also present. Fields are bounded by a mix of hedgerows and treelines.
- A number of wildlife designations are located in proximity to the Site, including Motte Meadows SAC and Smestow Valley LNR.
- Habitats on-site have potential to support a range of protected species and a suite of further survey work for bats, badgers, breeding and wintering birds, riparian mammals, invertebrates and great crested newts will be undertaken.
- Proposals on-site have the potential to include areas of new high quality habitat such as wildflower meadow, ponds and woodland. These will provide opportunities for protected species that may be using on-site habitats.
- Retention of high quality habitats such as woodland and ponds, and creation of new ecologically valuable habitats alongside development will help contribute towards achieving at least 10% net gain in biodiversity.

### 6.4 TOPOGRAPHY

- The Site possesses some gentle slopes, with the lowest points located at the north western corner of the Site and along the southern boundary.
- There are no technical barriers to overcome in order to secure



*View looking north west across the Site from the south eastern corner of the Site.*

### 6.5 ODOUR

- The site is located to the north of the Codsall Sewage Treatment Works.
- Initial investigations show that no significant adverse odour effect would be expected on the Site beyond a distance of approximately 160m.
- The proposed new homes and primary schools should not be located within 300m of the sewage treatment works.

### 6.6 FLOOD RISK

































- The majority of the Site lies within Flood Zone 1 (low risk of fluvial flooding).
- The southernmost parts of the Site fall within Flood Zones 2 and 3 and therefore are to remain undeveloped.
- The majority of the Site is at 'very low' risk of surface water flooding.

### 6.7 ACCESS AND MOVEMENT

- The opportunity exists to provide access to the Site from Watery Lane and Pendeford Hall Lane.
- The existing public footpath should be retained and improved to provide a traffic-free connection to Billbrook with all year round use.

# 07. WHAT COULD THE SITE DELIVER?

## Concept Masterplan

-  Site Boundary: **Aprx. 77.39ha**
  -  Potential residential area
    - **Around 1,200 new homes**
  -  Potential facilities:
    - **Local Centre**
    - **1 No. 2 Form Entry Primary School**
  -  Low voltage overhead power lines
  -  300m offset from waste water treatment works
- CIRCULATION**
-  Existing bus route and bus stops
  -  Existing railway line and station
  -  Potential vehicular access point
  -  Potential secondary/emergency access point
  -  Potential spine streets through the new development
  -  National Cycle Route 81
  -  Public footpaths
  -  Bridleways
  -  Bilbrook Jubilee Way
  -  Potential walking/cycling routes
- DESIGNATIONS**
-  Green Belt
  -  Canal Conservation Area
  -  Conservation Area
  -  Conservation Area Buffer Zone
  -  Listed Buildings
  -  Existing retail centre
- FLOOD RISK AND DRAINAGE**
-  Extent of flood zone
  -  Existing water features
  -  Potential locations for drainage (SuDS) basins
  -  Potential locations for wildlife ponds
- GREEN INFRASTRUCTURE & PLAY PROVISION**
-  Existing trees and hedgerows
  -  Potential public open space to serve the new development
  -  Potential structural tree planting
  -  Potential locations for interpretation boards
  -  Potential location for sports pitches
  -  Potential location for allotments
  -  Potential play provision:
    - **1 No. Combined NEAP & LEAP**
    - **1 No. MUGA**
    - **4 No. LEAP**



Main vehicular access point.

Boundaries strengthened with new native thicket planting to help filter views of the development, as well as enhancing habitats and biodiversity across the development. New recreational routes will meander through the open space, with new children's play facilities providing the opportunity for formal play for children of all abilities.

Wildflower along the southern boundary to be delivered to good condition.

Opportunity for existing public footpath to be upgraded to a footway and cycleway to integrate development into the existing urban fabric.



Potential secondary/emergency access point.

Potential location for a Local Centre, together with the area of public open space, Mobility Hub, sports pitches and play area, acting as a community hub to create an integrated community.

Existing public footpath and Bilbrook Jubilee Way retained within a green corridor.

Opportunity for new landscaping along existing hedgerows to northern, eastern and western boundaries to create a defensible Green Belt boundary.

Secondary vehicular access point.



Significance of Canal Area and Listed Bridge to be respected through the provision of open space, new tree and hedgerow planting and interpretation boards.

WATERY LANE

MOAT BROOK

SHROPSHIRE UNION CANAL

LOCAL CENTRE

SPORTS PITCHES

ALLOTMENTS

WILDLIFE AREA

COMMUNITY ORCHARD

LEAP

LEAP

WATER WASTE TREATMENT AREA

Grade II Listed Shropshire Union Canal Aqueduct

A large part of the Site has been left free from development, creating a new wildlife area. Wildlife ponds will be located with areas of wildflower planting, along with other ecological enhancement features to help promote wildlife, protect species that may be using on-site habitats, and enhance the natural character of the brook.

Proposed location for Sustainable Drainage System (SuDS) features, in the form of drainage basins at the low points of the Site, to help manage the flow of surface water during periods of heavy and persistent rainfall.

## 7.1 PLACEMAKING

Vistry Group is committed to creating a high-quality, beautiful and sustainable new community, working closely with the Council, key stakeholders and the local community to help shape the plans for the Site. Given the size of the Site, we would prepare a Masterplan Framework Document to co-ordinate the delivery of infrastructure and the community facilities, and to secure a high level of design of both the new buildings and the public realm.

Around 1,200 new homes will be built providing a mix of housing types, sizes and tenures that meet the needs of the local community. This will include first time buyer homes, family homes and homes for those downsizing. New affordable homes will enable local people who are seeking an affordable home to stay within their community.

## 7.2 BIODIVERSITY AND GREEN INFRASTRUCTURE

The new residents will have easy access to a range of well-connected to an accessible network of public open spaces with new routes for walking and cycling running through them. The open spaces will have a range of characters, including 'parks', 'woodland', 'sports pitches', 'allotments', 'play areas' and 'wildflower meadow'. The accessibility and quality of the open spaces will help to support a sense of wellbeing and healthy and active lifestyles. The large open space corridor along the Site's southern boundary will be known as Moat Brook Park and with its new children's play areas, sports pitches and allotments, will form a new community focal point for both the new homes and the wider Bilbrook and Codsall area.

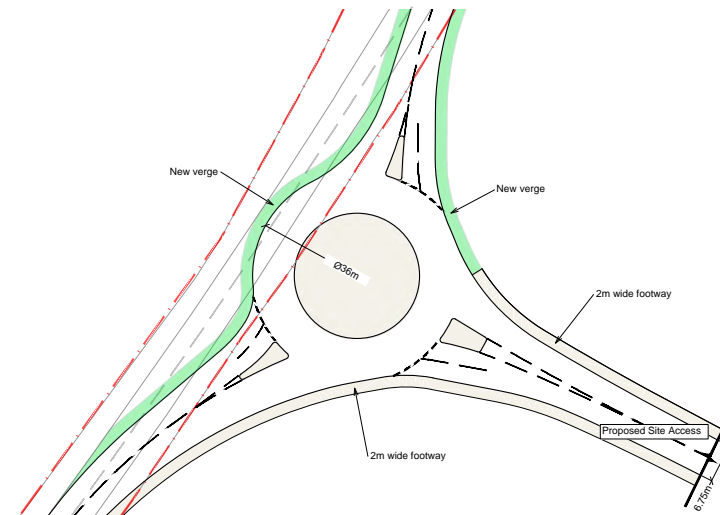
The new open spaces will help to retain and enhance the Site's existing landscape features, maintain habitat connectivity and enhance the Site's overall biodiversity value.

## 7.3 COMMUNITY FACILITIES

A range of new community facilities will be provided, including one new primary school, a Mobility Hub and a local centre. The local centre will be located in the heart of the new community and will be accessible for those walking, cycling and using public transport. The Mobility Hub will be located next to the local centre. Together, they can provide a range of facilities including a new shop, a café, a community hall, health facilities and co-working facilities.

## 7.4 VEHICULAR ACCESS

- **Main vehicular access:** to be taken from Watery Lane via a new roundabout.
- **Secondary point of access:** to be taken from Pendeford Hall Lane close to the Site's north eastern corner via a simple priority junction with Pendeford Hall Lane. Priority could be given to vehicles entering the Site in a westerly direction.
- **Emergency access:** via Pendeford Hall Lane close to the Site's north western corner.
- **East-west connectivity:** An east – west aligned street running through the heart of the new community will assist with the distribution of traffic through the wider area and minimise traffic impacts on the centre of Bilbrook.



## 7.5 PEDESTRIAN AND CYCLE CONNECTIVITY

- **Existing public footpath:** scope for a range of improvements, including a new wider bridge over Moat Brook incorporating level access, increase the width of the footpath, improve the surfacing to allow all year round use and provide low-level lighting.
- **Watery Lane footway connection:** new footway along eastern side of Watery Lane connecting the Site with Bilbrook and Codsall to the south. Will provide an important connection to Codsall Community High School via Elliotts Lane.
- **Connection to i54 Strategic Employment Site:** The access onto Pendeford Hall Lane will facilitate a direct cycle route to the i54 Strategic Employment Site.
- **Signalisation of canal bridge:** Signalised shuttle working is proposed for bridge over Shropshire Union canal to control traffic movements over the narrow structure and allow a protected pedestrian space. Signals will include advanced cycle stop lines to prioritise cycle movements.
- **Additional Cycle Parking at Bilbrook Station:** Currently the railway station is only served by limited cycle parking provision (circa 3 uncovered spaces). The development of the Site could facilitate much improved, covered cycle parking facilities.
- **Cycle routes within the Site:** to provide connections to the proposed community uses and facilities within the Site and to facilitate commuter trips beyond the Site.
- **Downgrade Pendeford Hall Lane:** Potential to downgrade existing narrow section of Pendeford Hall Lane to pedestrian / cycle / equestrian route by providing alternative vehicle route through site.

## 7.6 PUBLIC TRANSPORT / MOBILITY HUB

- **Bus services:** Given the size of the proposed new neighbourhood, it is considered appropriate to either divert the existing bus service 5 through the Site, or for a new bespoke bus service to be created.
- **Mobility Hub:** The opportunity may exist to provide a Mobility Hub as an integral part of the new community. The hub could include bus stops, cycle hire (including e-bikes and scooters), cycle maintenance and co-working facilities, therefore providing a more convenient, comfortable, and safer environment to access a range of sustainable transport modes.



Source: CoMoUK

## 7.7 DRAINAGE

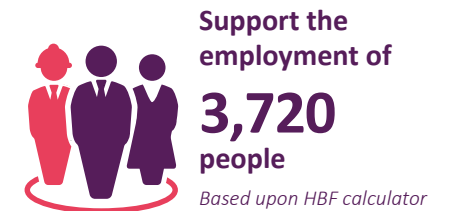
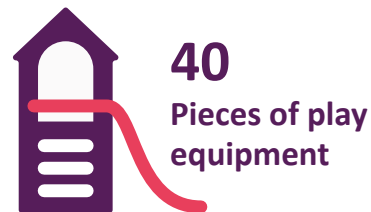
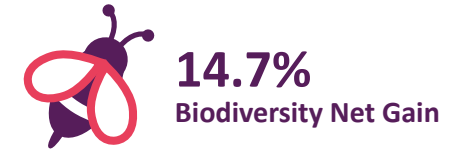
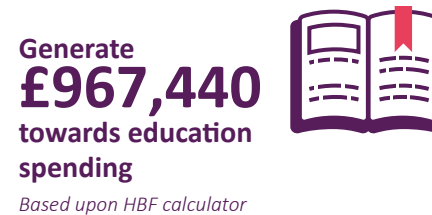
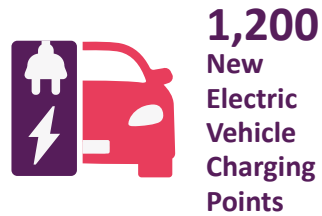
- There are some parts of the Site that are at risk from overland flows. These areas are to remain undeveloped and will form part of the new public open space.
- Surface water will be treated and stored on-site via the use of various Sustainable Drainage Systems (SuDS) measures, which could include permeable paving, filter drains, swales or attenuation basins.



# 08. CONCLUSIONS

## 8.1 KEY BENEFITS

The key benefits of the proposals are summarised below:





**Local centre**  
accommodating a range of  
community facilities.



New **allotments**,  
**children's play**  
**areas**, **sports**  
**pitches** and a  
network of **traffic-**  
**free routes** for  
walking and cycling.

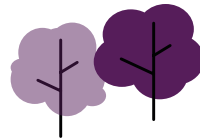
Sustainable links  
and easy access  
to adjacent major  
**employment**  
areas



**Mobility Hub** to help  
the new residents access  
a range of sustainable  
transport modes.



**34.6** hectares of green  
infrastructure - equates to  
**44.7%** of the total Site  
area.



**Public open**  
**space** alongside  
the Staffordshire  
Union Canal.

Creation of a distinct,  
**defensible**  
**boundary** to the  
green belt beyond.

## 8.2 CONCLUSIONS

The emphasis of planning policy is on achieving sustainable development which has a social, economic and environmental function. The ability to achieve this is in large part down to location and good design.

This document has set out how this can be achieved at Land South of Pendford Hall Lane, Bilbrook, with key benefits that the Site can bring summarised in the adjacent diagram. This diagram is based on the Concept Masterplan as currently proposed within this document and is subject to change as the masterplan evolves.

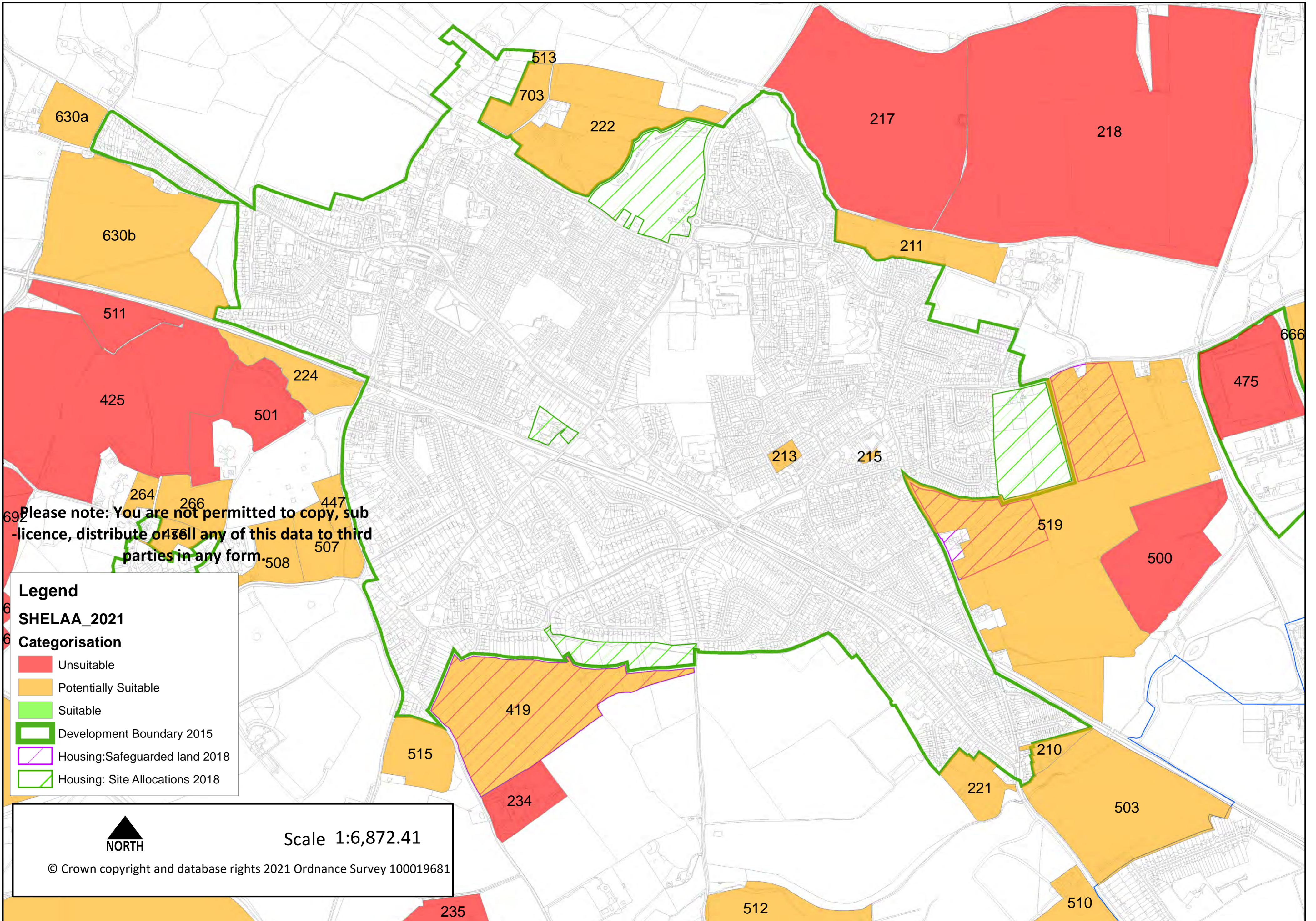
The Site is viable, achievable, realistic, logical and deliverable- it is unfettered being in one ownership and under the control of a single experienced developer. The Site represents an ideal opportunity to assist South Staffordshire Council in fulfilling its housing needs and those of the wider housing market area.

# Vistry Group

Vistry Group Strategic Land December 2021

**APPENDIX 3: SHELAA MAP FOR CODSALL AND BILBROOK**

# Codsall/Bilbrook SHELAA map



Please note: You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.

**Legend**

**SHELAA\_2021**

**Categorisation**

- Unsuitable
- Potentially Suitable
- Suitable
- Development Boundary 2015
- Housing: Safeguarded land 2018
- Housing: Site Allocations 2018

**NORTH**

**Scale 1:6,872.41**

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**APPENDIX 4: EXTRACT FROM STAFFORDSHIRE COUNTY COUNCIL'S ONLINE MAP OF PUBLIC RIGHTS OF WAY**

