

**South Staffordshire Local Plan Publication
November 2022 Regulation 19 Consultation**

December 2022

for Land at Bratch Common Road, Wombourne

On behalf of St Philips

Date: December 2022 | Pegasus Ref: P20-1302

Author: Sarah Butterfield



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
FINAL	19 Dec 2022	SB	SB	ISSUE



Contents.

1. INTRODUCTION.....	1
2. PLANNING POLICY CONTEXT.....	2
3. VISION, STRATEGIC OBJECTIVES AND PRIORITIES.....	3
4. DEVELOPMENT STRATEGY	4
5. SITE ALLOCATIONS – POLICY SA5 AND SUSTAINABILITY APPRAISAL COMMENTS.....	10
6. DEVELOPMENT MANAGEMENT POLICIES.....	12
7. CONCLUSION	18

Appendices contents.

Appendix 1: Vision Document

Appendix 2: Site Location Plan



1. INTRODUCTION

- 1.1. This representation responds to the 'South Staffordshire District Council's ('SSDC') Local Plan Review 'Publication Plan' ('the Plan') consultation held under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Representations are made with regard to the Plan itself and to the accompanying published evidence, having regard to the National Planning Policy Framework ('NPPF').
- 1.2. This representation is made by Pegasus Group on behalf of St Philips who have a specific land interest in land at Bratch Common Road, Wombourne, which has capacity to deliver up to 250 dwellings('the Site').
- 1.3. St Philips has previously submitted details of the Site alongside detailed representations to the Issues and Options and the Spatial Housing Strategy and Infrastructure Delivery consultation in October 2019; and to the Regulation 18 Preferred Options consultation in December 2021. This included the production of a Vision Document to demonstrate how the site could be delivered; the Vision Document is attached to these representations at Appendix 1 for completeness. The Site is Council reference 554 in the evidence base documentation that forms part of the Local Plan Review.
- 1.4. The Site extends to approximately 28 hectares and is located to the northwest of Wombourne (Site Location Plan attached at Appendix 2) but immediately adjacent to the settlement's north western boundary. The Site is bounded by Bratch Common Road and Trysull Road on its southern and western boundaries, with the north and western edges adjacent to open countryside beyond. The Site comprises two agricultural fields with fields boundaries defined by hedgerows and tree lines. A public right of way runs alongside the south and eastern edges of the site.
- 1.5. The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the NPPF, paragraph 35. For a Plan to be sound it must be:
 - a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.6. The representations also address the legal and procedural requirements associated with the plan-making process.

2. PLANNING POLICY CONTEXT

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

National Requirements for Plan-Making

- 2.3. The existing Local Plan for South Staffordshire was adopted in 2012, and as such a holistic review of the Plan is required as committed to within the Site Allocations Document 2018. This Local Plan Review will therefore ensure that an up-to-date Local Plan for South Staffordshire will be in place to support growth and meet future development needs.
- 2.4. Further, the commitment in the emerging Plan to undertake a review at least once every five years, is in accordance with NPPF para 33, which requires local planning authorities to keep policies in their Local Plans up to date by undertaking such a review.
- 2.5. The Proposed Publication Plan consultation follows previous consultations on the Local Plan review 'Preferred Options' which identified a spatial strategy with the identification of housing and employment delivery, whilst also identifying strategic objectives and priorities through numerous policies, including affordable housing. The current consultation document represents SSDC's final version of the Plan and is being pursued in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 2.6. NPPF para 24 also confirms that local planning authorities "*...are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.*" In the context of South Staffordshire, strategic matters include housing, employment, infrastructure, and the Green Belt.
- 2.7. St Philips supports SSDC's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists within the district to guide growth to 2039 and to ensure that development is genuinely plan-led but would like to make some representations on the soundness of some parts of the Plan.

3. VISION, STRATEGIC OBJECTIVES AND PRIORITIES

- 3.1. The Publication Plan (Regulation 19) identifies a number of 'Issues and Challenges' surrounding homes and communities, economic prosperity and the natural and built environment. The Document goes on to present a 'Vision' based upon these issues and challenges, and a number of 'Strategic Objectives' by which the Vision can be achieved.
- 3.2. It is noted that the Vision remains broadly the same as that presented in the adopted Core Strategy with regard to the aspirations to protect and enhance the district's rural character, communities, and landscape. It is considered that on this element it remains relevant and is broadly supported.
- 3.3. The Local Plan Review Vision does now include, however, the Council's declared climate emergency (declared in 2019), with greater emphasis placed on providing homes which accord with NPPF 8c which sets out that in order to achieve sustainable development, proposals should mitigate and adapt to climate change. It also seeks to 'protect and enhance' the District as it currently exists, rather than thinking forward and considering how growth could better the District as a whole.
- 3.4. In addition, the Plan's objectives should be amended to reflect the need to meet both the present and future housing requirements, including those pressures arising through the Duty to Cooperate with neighbouring authorities. In this instance the well-known unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) should be clearly considered. This is considered further later in these representations.
- 3.5. The Local Plan lacks clarity at Strategic Objective 1 and does not define the exceptional circumstances for release of Green Belt land as part of its strategy. It should be made clear that the need to identify land for growth and development over the Plan period, and beyond, means that there are exceptional circumstances arising which have required a full and detailed Green Belt boundary review, with a view to identifying land that it is proposed to be released from the Green Belt to meet the District's growth requirements.
- 3.6. In relation to Strategic Objective 2, reference is made to meeting the housing and employment needs of the District. It is considered this could be strengthened to refer to meeting the needs of both existing and new residents of the District, but the overarching thrust that new housing should be focussed on sustainable locations in the District, including the key villages, is supported.

4. DEVELOPMENT STRATEGY

Green Belt – Policies DS1 and DS2

- 4.1. Draft Policy DS1 is broadly in line with the relevant paragraphs of the NPPF relating to development within the Green Belt and is therefore supported. However, it should be noted that St Philips do not accept the Council's proposition that the Green Belt may constitute an opportunity to 'retain and enhance landscapes'. Green Belt is a development restraint policy set out at chapter 13 of the NPPF and is not a landscape or character policy. The NPPF outlines "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence". Therefore, the Council should amend the text within Policy DS1 and its supporting text to represent national policy.
- 4.2. The 2018 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Strategic Growth Study presented a strategic review of the Green Belt across the 'joint authorities' area. This review was undertaken in the light of the shortfall in housing need identified across the area. It was acknowledged that as a significant proportion of land within the HMA area is covered by Green Belt, 'exceptional circumstances' through Local Plan reviews would be required to alter the Green Belt boundaries.
- 4.3. The supporting text to Policy DS1 identifies that exceptional circumstances exist for Green Belt release within the South Staffordshire district. This is supported, as is the Council's commitment to release some land from the Green Belt for development to meet identified need.
- 4.4. However, to be sound, and accord with national policy the Plan must include a consideration of Green Belt boundaries that will endure beyond the end of the Plan period in 2039. Para 140 of the NPPF states that "*strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the Plan period.*"
- 4.5. The Plan should identify opportunities for safeguarded land so that anticipated housing and development needs and opportunities beyond 2039 are considered as part of the current Local Plan Review. Safeguarding of land will ensure such needs can be addressed without the need to undertake a further Green Belt boundary review, ensuring the amended boundaries endure beyond the Plan period.
- 4.6. St Philips interests at Bratch Common Road, Wombourne could be safeguarded as land to meet future development needs and requirements in a sustainable location adjacent to the village of Wombourne that accords with the Plan's overall spatial strategy.
- 4.7. The currently adopted Local Plan at Policy GB2 sets out safeguarded land for the longer term needs of the District. St Philips believes the proposed local plan would benefit from an introduction of a similar policy within the emerging Local Plan, especially in light of the recent collapse of the Black Country Plan which has led to greater instability of housing supply across the GBBCHMA. The introduction of safeguarded land would allow the Council to assess sites suitable for development and fully maximise the District's land to greater assist the GBBCHMA growing unmet housing need.

- 4.8. Relevant Green Belt boundary amendments, including the identification of safeguarded land should therefore be included in order for the Plan to be found sound.
- 4.9. Policy DS2 (Green Belt Compensatory Improvements) is a new policy included within the Regulation 19 Publication Plan. The Policy provides additional detail on expected compensatory improvements for Green Belt released sites when compared to the Preferred Options Document. St Philips supports the inclusion of a policy setting out the need for Green Belt compensation in relation to sites being removed from the Green Belt. However, the policy still leaves elements of ambiguity, outlining that planning applications will not be granted until appropriate compensatory improvements have been secured through Section 106 Agreements. Whilst it is appreciated that the SSDC have outlined that 'applicants must demonstrate proportionate compensatory improvements', this does not provide a clear requirement for Green Belt compensation and further clarification should be provided.
- 4.10. Policy DS2 also sets out the following hierarchy for Green Belt compensation.
- a) *"Compensatory improvements to remaining Green Belt land adjacent to, or in close proximity to the development site;*
 - b) *Compensatory improvements to remaining Green Belt land within the wider locality accommodating the development;*
 - c) *Compensatory improvements to remaining Green Belt land in an area identified through the council's latest Nature Recovery Network mapping or Open Space Strategy.*

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

- 4.11. The hierarchical approach to the Green Belt compensation policy is not supported. Neither the NPPF nor the PPG refer to a hierarchy of preferred methods of Green Belt compensation. Furthermore, when assessing the policy, it is not at all clear that the preferred methods of Green Belt compensation would deliver a greater benefit than the approaches lower down the hierarchy. In the first instance, it would appear that all of the potential methods (items a-c plus the penultimate paragraph) require some method of actually delivering the compensation. In practical terms this is likely to be via a S106 agreement associated with a planning permission to develop the allocation (former Green Belt) site and which either delivers contributions towards compensatory improvements or requires the delivery of the identified improvements.
- 4.12. Whilst it is accepted that having the GB compensation located close to the allocation is advantageous and should be pursued, ultimately it is the delivery of that improvement on land, which is in close proximity to the allocation, which is of greatest significance, and not whether the developer owns the compensation land, which seems to be the inference of criteria a) and b) of the proposed policy. Similarly, the lowest ranked element of the compensation hierarchy (the penultimate paragraph involving paying a commuted sum) could result in the benefits associated with the highest element in the hierarchy. This could be as a result of the contributions secured in the commuted sum being spent on land immediately adjacent to the development site.

- 4.13. In addition, there could be other benefits associated with particular Green Belt (GB) compensation schemes which may be more significant than just proximity to the development site. For instance, the compensation could deliver enhancements to give greater public access to a recreation route such as a Canalside walk or deliver improvements to a degraded nature conservation site. Such GB compensation may deliver wider benefits than merely enhancing land in the immediate vicinity of the site.
- 4.14. In view of the above it is suggested that the policy is amended to delete reference to the hierarchy and instead state that GB compensation is required in conjunction with development of sites removed from the GB which could include improvements to green infrastructure, woodland planting, landscape and visual enhancements, biodiversity improvements, new or enhanced cycle or walking routes and improved access to new, enhanced, or existing recreational and outdoor sports provision. The policy could indicate that this could be delivered through direct improvements to land or via S106 contributions and the Council will seek the optimum public benefits in proportion to the scale of the site being removed from the GB.

Housing – Policy DS4

- 4.15. St Philips support the recognition at Paragraph 5.8 of the Publication Plan that:
- “A key part of the new Local Plan is to establish the role that South Staffordshire council can play in meeting both its own housing needs and those of the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA), which contains local authorities with significant unmet housing needs (Birmingham and the Black Country).”*
- 4.16. The principle of the proposed 4,000 houses to support the GBBCHMA shortfall is broadly supported. However, the GBBCHMA Housing Need and Housing Land Supply Position Statement (July 2020) identifies the housing shortfall of the GBBCHMA as 67,160 dwellings. The now revoked Draft Black Country Plan 2018–2039 showed a shortfall of circa 28,000 homes in the Black Country alone. Birmingham City Council have recently suggested a potential shortfall of over 78,000 dwellings. Further, the ‘Mind the Gap’ Barton Willmore Paper dated March 2021 and ‘Falling Short – Taking Stock of Unmet Needs across GB&BCHMA’ paper by Turley in August 2021, both commissioned by HBF Members concluded that the significant unmet needs in the GBBCHMA exist now, and will continue to exist in the future.
- 4.17. It is important to stress that these shortfall figures do not take into consideration the 35% uplift applied to Birmingham introduced in December 2020 as the adopted Birmingham Development Plan. The Black Country housing shortfall also does not consider the 35% uplift applied to Wolverhampton City Council in May 2021. As set out in the HBF representations to the Publication Plan, the Council should confirm that if unmet needs in the GBBCHMA increase then its contribution will also proportionately increase. Further, the Council’s commitment to meeting that unmet need should be set out in a Joint Statement of Common Ground with the other GBBCHMA authorities
- 4.18. As a result of the overwhelming shortfall in both the Black Country and Birmingham and despite South Staffordshire allocating 4,000 homes, St Philips believes there is scope for an uplift of this figure.
- 4.19. The starting point for the identification of housing requirements is the 2014–based sub-national household forecasts as set out in National Planning Policy Guidance (‘PPG’) and the

utilisation of the standard method of calculation. PPG is also clear that the figure produced by the Standard Method represents a minimum figure, rather than a requirement.

- 4.20. PPG provides a non-exhaustive list of examples whereby additional growth beyond the minimum requirement may be appropriate, including relevant growth strategies for the area, strategic infrastructure improvements or accommodating unmet need from neighbouring authorities.
- 4.21. With this in mind, the recognition of the significant housing shortfall arising from Birmingham City and the Black Country at paragraphs 5.10–5.15 of the Publication Plan is supported. The 37,900-home shortfall arising from within Birmingham has been tested and confirmed at examination, whilst the Black Country Authorities produced the now revoked Draft Black Country Plan 2018–2039, following Dudley Council's withdrawal from the Plan was subject to consultation in 2021, and concluded that the amount of housing need cannot be accommodated in the Black Country amounts to around 28,239 homes to 2039.
- 4.22. The principle of the proposed 4,000 houses to support the GBBCHMA shortfall is broadly supported by St Philips however, as discussed above, the published unmet housing need for the GBBCHMA is significantly short of the actual need which is well in excess of 66,000 homes. In addition, South Staffordshire District Council have allocated the minimum figure of housing required by the Standard methodology and as such, St Philips raises concerns regarding a potential insufficient housing to meet the District's housing needs.
- 4.23. As such, South Staffordshire should incorporate additional housing allocations within the Local Plan to address both the growing unmet housing needs of the GBBCHMA and the Council's own housing need. St Philips as previously discussed at paragraph 4.16, suggests the Council introduce a policy which safeguards land for future development to provide a long-term strategy should the housing need increase further.

Economic Uplift and Housing Figures

- 4.24. The South Staffordshire Housing Market Assessment 2021 (HMA) sets out the broad economic consequences of the projected growth in Chapter 5. However, the HMA fails to consider the impact of committed development at the HS2 West Midlands Interchange ('WMI'), which is projected to create around 8,500 new jobs and up to 8,100 indirect jobs off-site, well in excess of the increase in the working age population between 2018 and 2038 identified by the HMA (6,618 people). The updated HMA 2022 also does not consider the impact of the committed WMI. In addition, both the 2021 and updated 2022 HMA do not consider that significant job growth will be provided through committed strategic employment developments planned at i54 and ROF Featherstone.
- 4.25. The Economic Development Needs Assessment 2020–2040 (June 2022) (EDNA), prepared by DLP Planning on behalf of South Staffordshire District Council, sought to identify future employment needs across the South Staffordshire area for the period 2020–2040. The EDNA outlines that the approved WMI has the potential to employ 16,600 both on and off site.
- 4.26. The EDNA also identifies the i54 development as a key 'employment corridor' and at paragraph 4.22 states that the facility '*could lead to a profound effect on the local and sub-regional property market as demand for engineering/manufacturing space increases*'.

- 4.27. The updated HMA at paragraph 5.10 identifies that the projections profiling the change in population indicate that the working age population in South Staffordshire will grow by 6,618 people between 2020 and 2040. This is notably in excess of the growth of 4,824 jobs indicated by the EDNA. The updated HMA at paragraph 5.13 suggests that the housing requirement of 9,089 homes over the Plan period is sufficient to address the projected economic growth for the District. St Philips has concerns regarding the proposed housing figures due to the rising instability of the Black Country leading to greater unmet housing needs across the GBBCHMA which they feel would result in a greater housing requirement.
- 4.28. Further evidence is necessary prior to the Plan being submitted for examination to consider the balance between jobs and the working age population and the rising unmet housing needs of the GBBCHMA with reference to the recent changes in administration of the now 'defunct' Black Country Core Strategy Review.

Longer Term Growth Aspirations for a new settlement – Policy DS6

- 4.29. Policy DS6 sets out an aspiration for SSDC to deliver a new settlement beyond the plan period. A broad location comprising the transport corridor formed by the A449 and West Coast Mainline between Wolverhampton and Stafford has been identified as a potential area of search for such proposals.
- 4.30. St Philips do not support the identified location for such longer-term growth as it has not been justified at the present time when considered against reasonable alternative options.
- 4.31. For example, whilst the draft policy sets out some parameters for the development of a new settlement, should it come forward, it is considered that there are locations around existing settlements that could accommodate such growth. For example, there are land options around Wombourne that could meet such need, and which would likely cause less harm to the landscape and openness of the Green let than a large strategic new settlement.
- 4.32. Our client's land at Bratch Common Road has been identified in the Council's own evidence base (LUC Green Belt Study, 2019, sub-parcel S53Cs3, page 612) as causing low-moderate harm to the Green Belt and having a low-moderate impact on the landscape. Development would enhance the sustainability of the village and include the provision of additional infrastructure that would, with reference to the Council's Rural Services and Facilities Audit 2019, assist in improving access to places of employment or NHS services via public transport, to deliver additional community infrastructure for the village.
- 4.33. With reference to para 138 of the NPPF, the purposes of including land within the Green Belt would not be harmed by the removal of the land at Bratch Common Road for development:
- a) To check the unrestricted sprawl of large built-up urban areas: Development of the land at Bratch Common Road would not cause any lessening of the gap between Wombourne and the western edge of the Black Country;
 - b) To prevent neighbouring towns merging into one another: Development of the Site would not result in Wombourne being any nearer to Wolverhampton, Kinver or Bridgnorth than its current extents;
 - c) To assist in safeguarding the countryside from encroachment: Development of the land at Bratch Common Road could provide a strong and defensible boundary to the edge of



the settlement, to define it from the Green Belt beyond in such a way that its boundaries would remain in place beyond the end of the Plan period;

- d) To preserve the setting and special character of historic towns: Development of the site would have no impact upon any identified historic town, or indeed on any identified heritage asset.

4.34. The Plan, as drafted, purports the idea of a potential New Settlement in the longer term, but there is no specific location for the settlement, it has not formed part of the reasonable alternatives considerations as a result of there being no specific location identified. It has therefore not been fully justified so cannot be found sound as written.

5. SITE ALLOCATIONS – POLICY SA5 AND SUSTAINABILITY APPRAISAL COMMENTS

- 5.1. The principle of additional development in Wombourne being pursued to deliver housing need requirements is supported. However, the allocation of land at Billy Buns Lane and Gilbert Lane (allocation refs: 463 and 284) is not considered sound when considered against appropriate site selection criteria and the evidence base. The release of such land from the Green Belt would cause harm that could be avoided through the allocation of alternative sites, such as that in which St Philips has interest, at Bratch Common Road.
- 5.2. The Housing Site Selection Paper (2021) sets out detailed commentary on the Proposed Housing Site Allocations set out at Policy SA5. The 'moderate-high' landscape sensitivity of the proposed allocation is a result of the Site's visual prominence as identified in the Landscape Sensitivity Study, but the Site is considered suitable for development based on its sustainability characteristics, being in proximity of local schools and also significantly close to the village's centre than other sites around the village.
- 5.3. There are other sites around Wombourne which could deliver development whilst causing less environmental harm. The site at Bratch Common Road has been identified as having a low-moderate landscape sensitivity to development and the Vision Document (Appendix 1) confirms that the site is well related to the existing settlement of Wombourne.
- 5.4. Further, contrary to the comments at Appendix 25 of the Housing Site Selection Topic Paper, the Bratch Common Road site is able to provide suitable highways access. There is an opportunity to widen Bratch Common Road, which would improve highway safety, facilitate pedestrian movement and could unlock future development potential within the Wombourne Area. The proposed development of the site would also provide a pedestrian footway on Bratch Common Road, which currently doesn't exist. Access improvements to local amenities can be delivered through improvements to the local Public Rights of Way Network and via the proposed pedestrian/cycle infrastructure, which facilitates movement between the site and local amenities.
- 5.5. The Site is within 800m of a secondary school and approximately 900m of two primary schools, and the distances to other local facilities are shown on the Local Movement and Facilities plan on page 13 of the Vision Document at Appendix 1.
- 5.6. The Council's Sustainability Appraisal (SA) identified that the site would have a major negative impact on climate change adaptation as it is in part in an area at high risk of surface water flooding, However, the existing surface water flows can be accommodated on the site and ground re-profiling would mitigate surface water flooding concerns and ensure that the drainage design for the proposed development provides betterment in terms of surface water management.
- 5.7. With those points in mind, the land at Bratch Common Road would perform better than the proposed allocation at Billy Buns Lane and Gilbert Lane when considered against the Objectives of the SA and should be a preferred site for development. Whilst it may be further from some local amenities that are measured by the SA it would result in less landscape impacts and therefore lower environmental impacts that would arise from the proposed site allocations.



- 5.8. The allocation ref: 463 and 284 in Policy SA5 is therefore considered unsound as it is not fully justified and would not be effective due to environmental impacts.
- 5.9. But the information set out above demonstrates that land off Bratch Common Road is a suitable site for development. There is an agreement in place between the landowner and St Philips to facilitate the development of the site.
- 5.10. There are no constraints likely to render the site undeliverable in the Plan period. The site is available now.
- 5.11. There are no existing uses that would require relocation and no issues of contamination that would require remediation. The impacts of the development of the site can be mitigated and, in many cases, a positive outcome can be achieved.
- 5.12. The site is deliverable and immediately available and subject to allocation, could deliver homes and associated community benefits within the next 5 years.

6. DEVELOPMENT MANAGEMENT POLICIES

Policy HC1 – Housing Mix

- 6.1. Housing mix should be guided by market signals as reflected in the most up to date assessment needs. Such assessments will need to be updated over the course of the plan period.
- 6.2. The requirement that 70% of properties comprise of 3 bedrooms or less is restrictive and does not afford the flexibility expected by NPPF para 62 to meet the need to provide for a range of size, type and tenure for different groups.
- 6.3. The use of the phrase 'disproportionate' in the penultimate paragraph, when describing the quantum of 4+ bedroom houses, lacks the precision and clarity needed for a Plan policy.
- 6.4. The policy should also comment that all is subject to viability assessment, thus allowing for flexibility in its application.
- 6.5. Clarification should also be made defining 'major' development. It is noted that the Publication Plan has removed footnote 11 from the Issues and Options Plan which defined major development in accordance with the NPPF definition stating major development is "*development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more*". Whilst a definition is contained within the NPPF, the statutory definition is contained within the Town and Country Planning Development Management Procedure Order, which defines major development as where:

(Ci) the number of dwellinghouses to be provided is 10 or more; or

*(Cii) the development is to be carried out on a site having an area of 0.5 hectares or more **and it is not known whether the development falls within sub-paragraph (c)(i)***
- 6.6. The text emphasised above is an important qualifier when considering whether or not a proposal constitutes major development. This qualifying text has not been carried through into the definition contained within the NPPF. St Philips suggest a definition of major development should be reintroduced into the Plan, with the DMPO definition referred to for the avoidance of doubt.
- 6.7. In light of the above, the policy is considered unsound, as it is neither justified nor consistent with national policy for the reasons set out above.

Policy HC3 – Affordable Housing

- 6.8. Policy HC3 requires proposal for major residential development to provide 30% of all dwellings as affordable housing. The use of the term 'major residential development' in this context requires a definition to save confusion as to what size of development affordable housing becomes a requirement, it is presumed to be the same as that within the NPPF Glossary. The policy also needs to ensure that evidence is provided when considering viability, especially when looking at brownfield sites.

- 6.9. The requirement for 30% affordable housing appears to be supported by the Viability Study Stage 2 Report 2022 (VA) which confirms at paragraph 3.2.7 that the proposed affordable housing figure is appropriate for South Staffordshire.
- 6.10. The Council's position to continue with the established approach of using Section 106 planning obligations to secure the necessary infrastructure to support and mitigate the effects of new development is supported.
- 6.11. The requirement to 'pepper pot' affordable housing in clusters across the development is generally supported. However, the policy should recognise that for management purposes, Registered Providers do require a degree of clustering of affordable housing within a development and this will inform site layouts.
- 6.12. The frequent reference to further guidance being provided by the Affordable Housing SPD is noted. The SPD should do no more than clarify the Local Plan policy and it is suggested that if the requirements for implementing the policy are known to need explanation now then these should either be included within the Plan now or set out within the explanatory text. The SPD is not the appropriate approach for setting new policy and or burdens on delivery, and the Plan should provide clarity at the point of adoption as to what it requires.
- 6.13. St Philips supports the introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance. However, a number of specific comments are made on the policy as drafted:
- The provision of tree lined streets (item c) should be subject to highway authority agreement, and where appropriate, their adoption. In St Philips' experience, local highway authorities do not want trees in immediate proximity of the street due to management concerns or liabilities.
 - The point on house types and tenures (item l) is repetition of policy material set out at Policy HC1 and is therefore unnecessary.

Policy HC12 – Space About Dwellings and Internal Space

- 6.14. The continuity of existing external space and dwellings standards is generally supported although there should be a recognition that certain house types, for example Part M4(2) dwellings, should have smaller, more manageable gardens.
- 6.15. The requirement that all dwellings should meet Nationally Described Space Standards (NDSS) is generally supported but some flexibility must be allowed in its application as occasionally non-compliance with NDSS may be appropriate for sound urban design reasons and the Policy should therefore build in some flexibility.
- 6.16. Notwithstanding, if the NDSS requirement is to be pursued then the Council need to provide additional evidence for the Local Plan Examination to demonstrate that the policy is sound. National Planning Guidance Housing: optional technical standards (paragraph O20) clearly states that *"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*
- *Need – evidence should be provided in the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be*

properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

- *Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *Timing – there may need to be a reasonable transition period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”*

6.17. It is clear that the introduction of the NDSS requires a Local Plan policy which has been fully evidenced, justified and viability tested. The South Staffordshire Housing Market Assessment Update 2022 (HMA) refers to the NDSS (paragraph 7.32) only in the context of assessing the need for accessible and adaptable homes. The HMA does not provide any justification or evidence for requiring NDSS in the District.

Policy HC14 – Health Infrastructure

6.18. This policy refers to proposed developments causing ‘unacceptable impact’ on existing health care facilities but fails to define what level of impact is deemed unacceptable or how that is to be measured. The policy should also acknowledge that not all residents of a development will be new to a catchment area and may indeed already be registered by the local health care provider, thereby not creating a net additional burden.

6.19. Careful analysis is therefore required with regard to the capacity of existing infrastructure to accommodate new patients, before reaching a conclusion as to what any CIL Regulation 122 compliant financial request might be. The requirement for CIL Reg compliance of any request should be clearly specified within policy.

6.20. The policy is considered unsound, as it is neither *justified* nor *consistent with national policy* for the reasons set out above.

Policy HC15 – Education

6.21. There is broad support for the policy’s objective for the improvement or construction of schools to meet the demand generated by children in new development. However, as currently written, the policy makes a blanket assumption that new education infrastructure will be required from all new development.

6.22. The Policy text requires further clarification as any such provision to be delivered by a S106 agreement, must have regard to the tests of CIL Regulation 122. The policy should make this explicit. In this regard, the policy should also recognise new infrastructure will be required from new development, only where it can be demonstrated that existing capacity to accommodate growth does not currently exist.

6.23. The policy is considered unsound, as it is neither *justified* nor *consistent with national policy* for the reasons set out above.

Policy HC17 – Open Space

- 6.24. Whilst there is no in principle objection to the requirements of the policy or the provision of open space within developments, some clarifications are required in order to ensure that the Policy is sound.
- 6.25. The policy requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site, for example where there is already high-quality equipped play provision in the locality it would not make sense to duplicate this provision. In addition, it is not appropriate to require open space to be centrally located on all sites as this does not take into consideration differences in development sites opportunities and constraints. It is requested that the Council amend the policy to allow a more flexible approach to achieve the right design solution for each site.
- 6.26. The focus of Green Infrastructure provision should be based on quality rather than quantity or 'useability' and the exclusion of small incidental green infrastructure (GI) without a clear recreational purpose from on-site open space provision is not supported. The policy text cites landscape buffers as an example of incidental GI which may be excluded. This is not appropriate as landscape buffers can be of a significant size and clearly make a contribution towards open space provision on a site. They should therefore be included in these calculations. Planning Practice Guidance acknowledges that '*Green infrastructure can embrace a range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals and other water bodies*' (Paragraph 004 – ref ID: 8-004-20190721).
- 6.27. The policy should therefore be revisited and clarified, with clear reference to national guidance ensure that open space and green infrastructure is properly and clearly defined and to recognise the contribution that a range of spaces and uses will bring to a development.
- 6.28. The policy as drafted is unsound as it is *inconsistent with national policy* and is *unjustified* for the reasons set out above.

Policy HC18 – Sports facilities and playing pitches

- 6.29. Policy HC18 is informed by the playing pitch and sport facilities assessments produced by KKP in 2020 and is broadly supported.
- 6.30. It is noted that further guidance on the procedure for determining provision required from new development will be set out in an Open Space, Sport, and Recreation SPD. However, the policy requires all new major residential development to contribute towards sports facilities and playing pitches, but no further quantitative details are provided. It would be more appropriate for SSDC to define standards expected from development as part of policy (as per the open space standard defined by Policy HC17, for example). This approach provides greater certainty in respect of the infrastructure delivery requirements expected from sites, which ultimately impacts upon their viability. The level of provision expected, and the associated viability implications should be considered within both the Infrastructure Delivery Plan and Viability Assessment.

- 6.31. The requirements of delivering sports facilities and playing pitches through on-site provision or S106 contributions will have a direct impact on the viability of sites and the Council must ensure the delivery of all potential obligations are taken into account for both on and off site provision to support the soundness of the Plan at examination.

Policy NB2 – Biodiversity

- 6.32. St Philips are supportive of the need to address net losses to Biodiversity, through the provision of enhancement to deliver and overall net gain. The Council's policy requirement to deliver 10% Biodiversity Net Gain, reflects that of the Environment Act and is not objected to. Indeed, it reflects one of the core principles of the NPPF to conserve and enhance the natural environment.
- 6.33. In delivering net gain, however, the policy needs to provide as much flexibility as possible. The key test of policy is whether the 10% BNG is being delivered, not necessarily the specific method by which it is delivered. It is important that the way in which these 'net gains' are calculated is given careful consideration and that a pragmatic view is taken in terms of biodiversity enhancements, where there are clear landscape and habitat improvements, rather than being wholly reliant on the output of rigid calculator, in particular where this would impede the delivery of much needed housing.
- 6.34. In this regard, certain aspects of the policy would benefit from clarification. Subsection a) for example, discusses 'maintaining and enhancing existing habitats' on development sites as a priority. It has to be questioned, however, that where sites are allocated for delivery, whether such a goal is achievable. Certainly, it is good practice to retain where possible, hedgerows, mature trees, and other key ecological assets. However, for the policy to indicate that habitat protection on site is a priority, over matters such as high-quality urban design, or delivery of any of a raft of other local plan policies, gives this specific element of policy delivery an undue prominence.
- 6.35. The policy would benefit from some limited re-wording (replace 'as a priority' with 'where possible' for example) to provide a more balanced and practical response to achieving the necessary 10% BNG delivery.

Policy NB4 – Landscape Character

- 6.36. Policy NB4 would benefit to an amendment in the text, which reflects the comments made on Policy NB2 above. As drafted, the second paragraph states:

"All trees, woodland, and hedgerows should be protected and retained"

- 6.37. Whilst it is appreciated that the following sentence identified that should a loss be required, appropriate mitigation measure must be delivered by the developer, the above sentence should be amended to the following:

"All trees, woodland and hedgerows should be protected and retained wherever possible".

Policy NB6 – Sustainable Construction

- 6.38. Given that the Environment Act 2021 has recently been made into law, it needs to be made clear that this policy reflects the Act and its purpose and that it repeats the laws written within it.

6.39. Concern is raised with some of the technical detail raised in Policy NB6. Clause 3 regarding embodied carbon, includes the statement.

“Developers must ensure that a recognised monitoring regime is put in place to allow the assessment of energy use, indoor air quality, and overheating risk for 10% of the proposed dwellings (of the council’s choosing) for the first five years of their occupancy, and ensure that the information recovered is provided to the applicable occupiers and the planning authority.”

6.40. Whilst St Philips fully appreciate the value of Whole Life–Cycle Carbon assessments and the need for some form of post construction, pre–occupation assessment, there is concern raised about this policy. Firstly, once sold the properties will be owned by the purchasers and their mortgagees. There are issues of data protection and consent surrounding the recording and sharing of energy use, air quality and overheating risk data with a third party, in respect of properties that the developer will not own.

6.41. Secondly, a question arises as to the purpose of such widespread collation of such data. It will not be possible to *post factum* make alterations to the constructed buildings, so what is the benefit or purpose of such a significant amount of data collation? If the purpose is to inform and advise as to future construction methods, then this could be equally achieved by an informed and targeted research exercise by organisations such as the BRE in advising Governments and through amendments to building regulations. Extracting, what is in effect lifestyle data, from private individuals, is neither considered desirable nor practical in this regard.

6.42. There is no evidence to suggest that the Council have considered or addressed the GDPR implications of this requirement, its effect on ‘mortgage–ability’, or indeed its effect on sales values. Presumably properties which are wired to share private individual’s lifestyle data, would be less attractive in the market place, and that would be reflected in reduced sales values. This element of the possible is not practical to be delivered in the form proposed, and is therefore considered unsound, on the grounds of being neither *justified* nor *consistent with national policy* for the reasons set out above.



7. CONCLUSION

- 7.1. This representation is made by Pegasus Group on behalf of St Philips to the South Staffordshire Local Plan Review, Publication Plan (Regulation 19) consultation. This representation relates to land off Bratch Common Road, Wombourne, Which St Philips is promoting for residential development.
- 7.2. St Philips is supportive of the Local Plan Review undertaking, but has made specific comments on key matters associated with the Local Plan Review. These include the amount of land identified for housing, Green Belt land release and safeguarded land, on some of the Wombourne allocations, on some development management policies, and, on site specific matters associated with the Council's consideration and evidence base on the land at Bratch Common Road. These matters must be addressed in order for the Plan to be found sound.
- 7.3. St Philips consider that their land interests at Bratch Common Road are suitable and deliverable for residential development, subject to release from the Green Belt and that the site could deliver development to meet the identified housing needs within the Plan period, or even beyond as safeguarded land.



Appendix 1 – Vision Document

VISION DOCUMENT

BRATCH COMMON ROAD

WOMBOURNE

DECEMBER '18



ST PHILIPS

Barton Willmore / 101 Victoria Street
Bristol BS1 6PU / tel 0117 929 9677
Email james.dehavilland@bartonwillmore.co.uk

Desktop Publishing and Graphic Design by Barton Willmore Graphic Communication

This artwork was printed on paper using fibre sourced from sustainable plantation wood from suppliers who practice sustainable management of forests in line with strict international standards. Pulp used in its manufacture is also Elemental Chlorine Free (ECF).

J:\29000 - 29999\29000 - 29099\29042 - Bratch Common Road, Wombourne\A5 - Reports & Graphics\Graphic Design\Documents\Vision Document\29042 Wombourne Vision 07.indd

© The contents of this document must not be copied or reproduced in whole or in part without the written consent of The Barton Willmore Partnership. All plans are reproduced from the Ordnance Survey Map with the permission of the Controller of HMSO. Crown Copyright Reserved. License No. 100019279.

Date 03.12.2018 Status Draft Rev D

CONTENTS

1. Introduction	4
2. Local Context	12
3. Site Assessment	26
4. Design Principles & Concept	48
5. Is the Site Deliverable?	52
6. Summary of Aspirations	54

VISION

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





1. INTRODUCTION

1.1. Document Scope

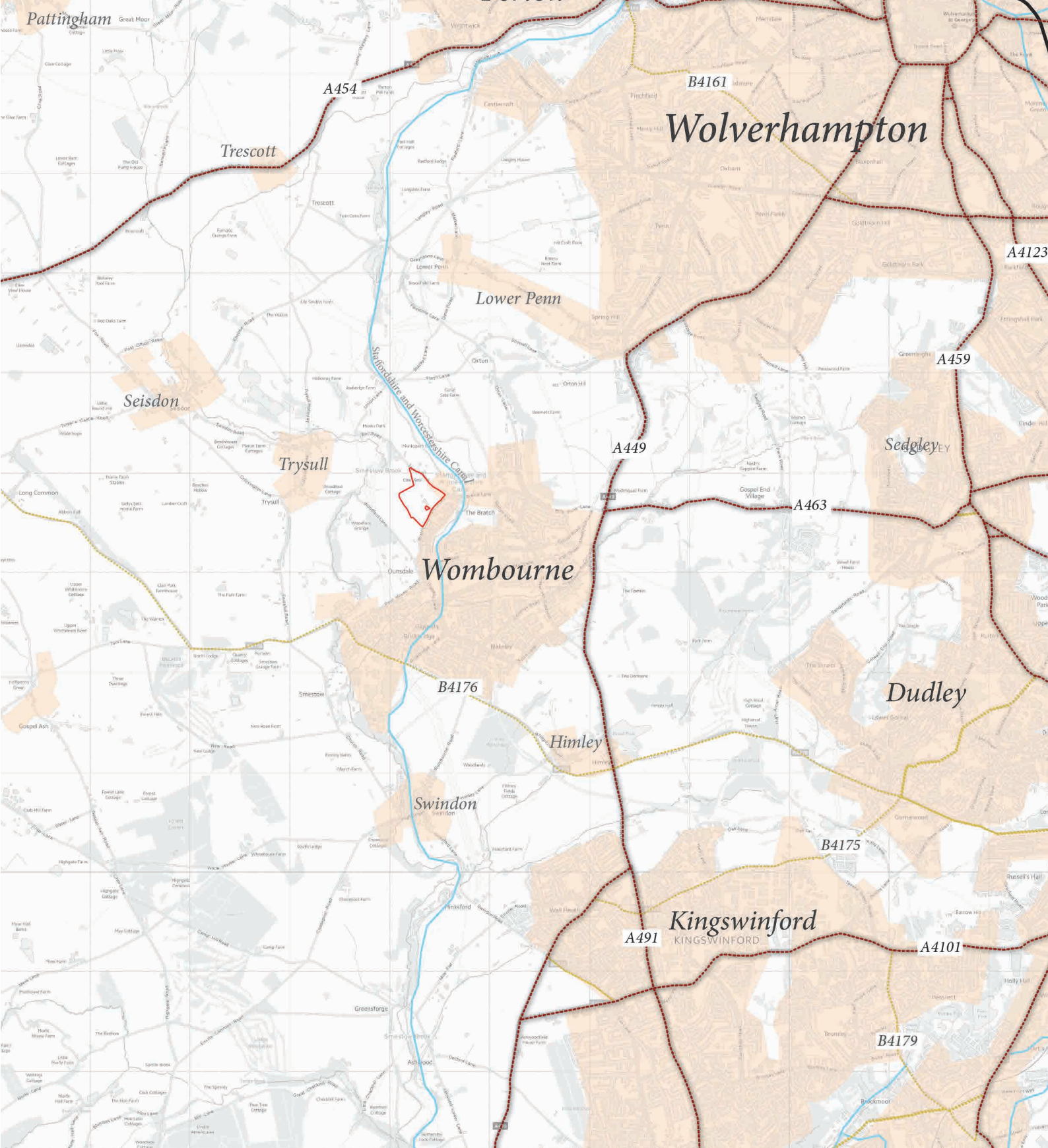
This Vision Document has been prepared on behalf of St Philips Ltd to support promotion of the site for residential development at Bratch Common Road, Wombourne through the South Staffordshire Local Plan review process.

The key aims and objectives of the document are:

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

1.2. Site Location

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



Pattingham

Trescott

B4161
Wolverhampton

Lower Penn

Seisdon

Trysull

Staffordshire and Worcestershire Canal

A449

Sedgley

Wombourne

A463

Dudley

B4176

Himley

Swindon

B4175

A491
Kingswinford

A4101

B4179

1.3. Site Description

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

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

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



Site Photo - Bratch Common Road

Trysall Road

Bratch Lane

Staffordshire and
Worcestershire Canal

Bratch Common Lane

Wombourne



1.4. Planning Policy

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

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

Local Plan Review

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

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

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

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

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

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

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

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

Evidence Base

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

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

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

1.5. Assessment Against The Five Purposes of The Green Belt

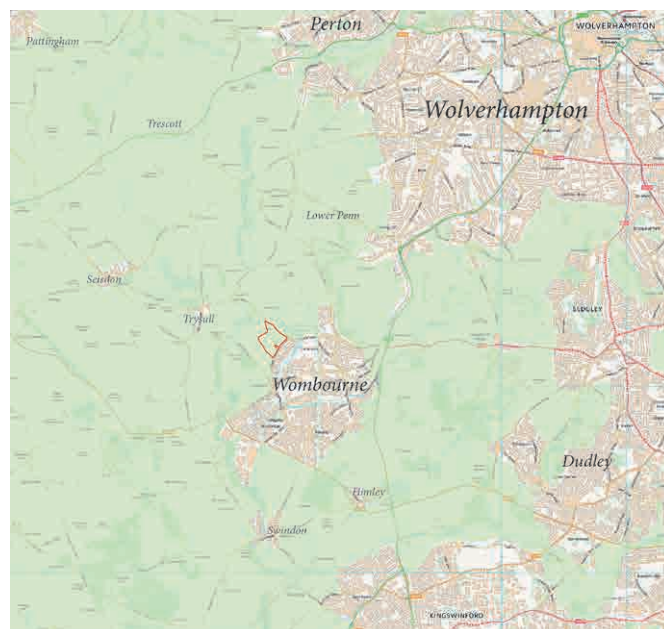
To date, the Council’s most recent evidence to inform the areas of Green Belt designation within the Borough is the South Staffordshire Partial Green Belt Review 2016. This considers the performance of Green Belt parcels around the defined settlements in the District, but stops short of assessing the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

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

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

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

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



Local Green Belt Extent

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

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

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

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

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

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

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

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

2. LOCAL CONTEXT

2.1. Access, Movement & Facilities

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

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

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



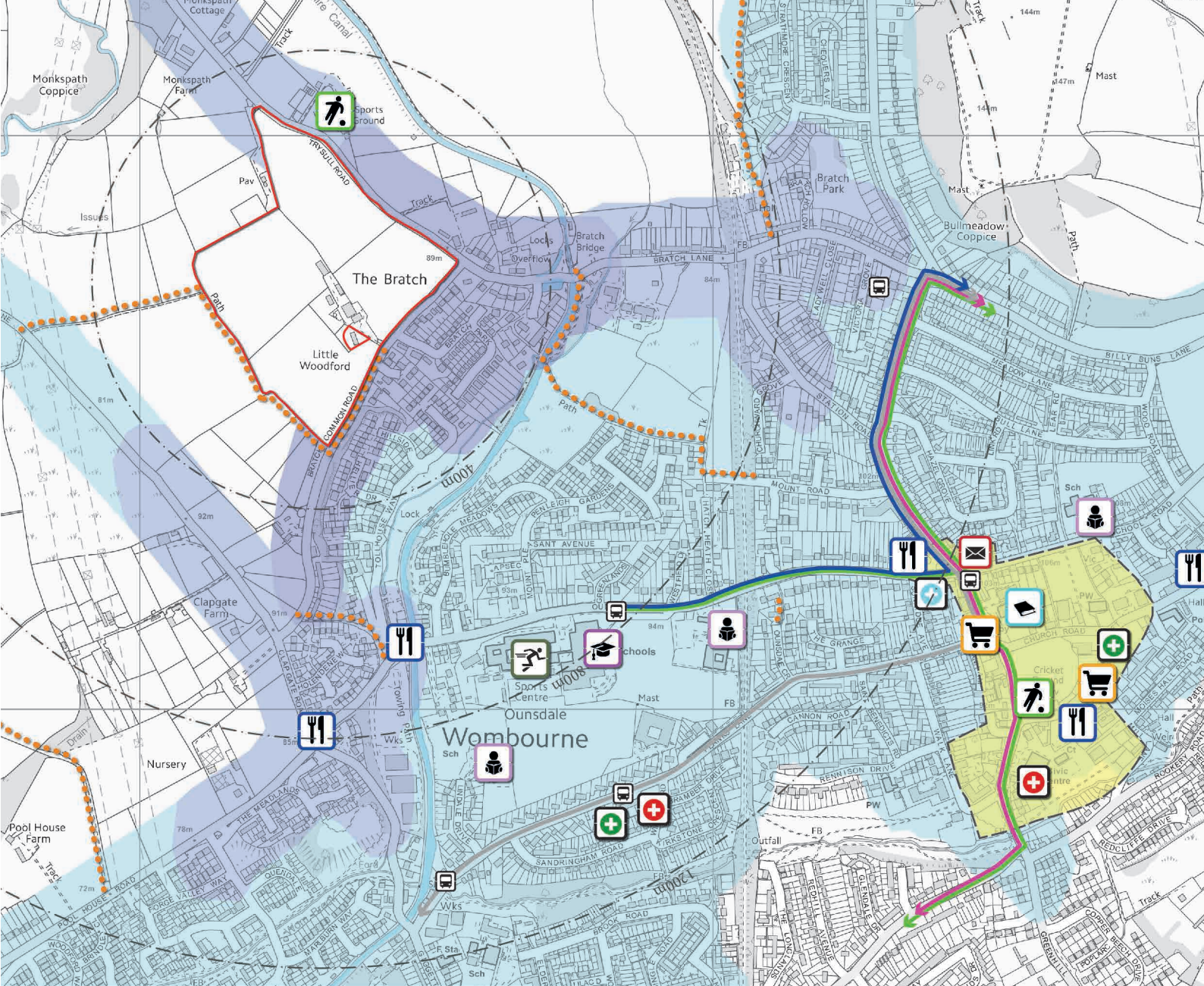
Local bus service connecting to village centre.







Local Co-operative



View south over village green / cricket pitch.



Local Movement & Facilities Plan

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

2.2. Landscape Character

National Landscape Character: NCA: 66 Mid Severn Sandstone Plateau

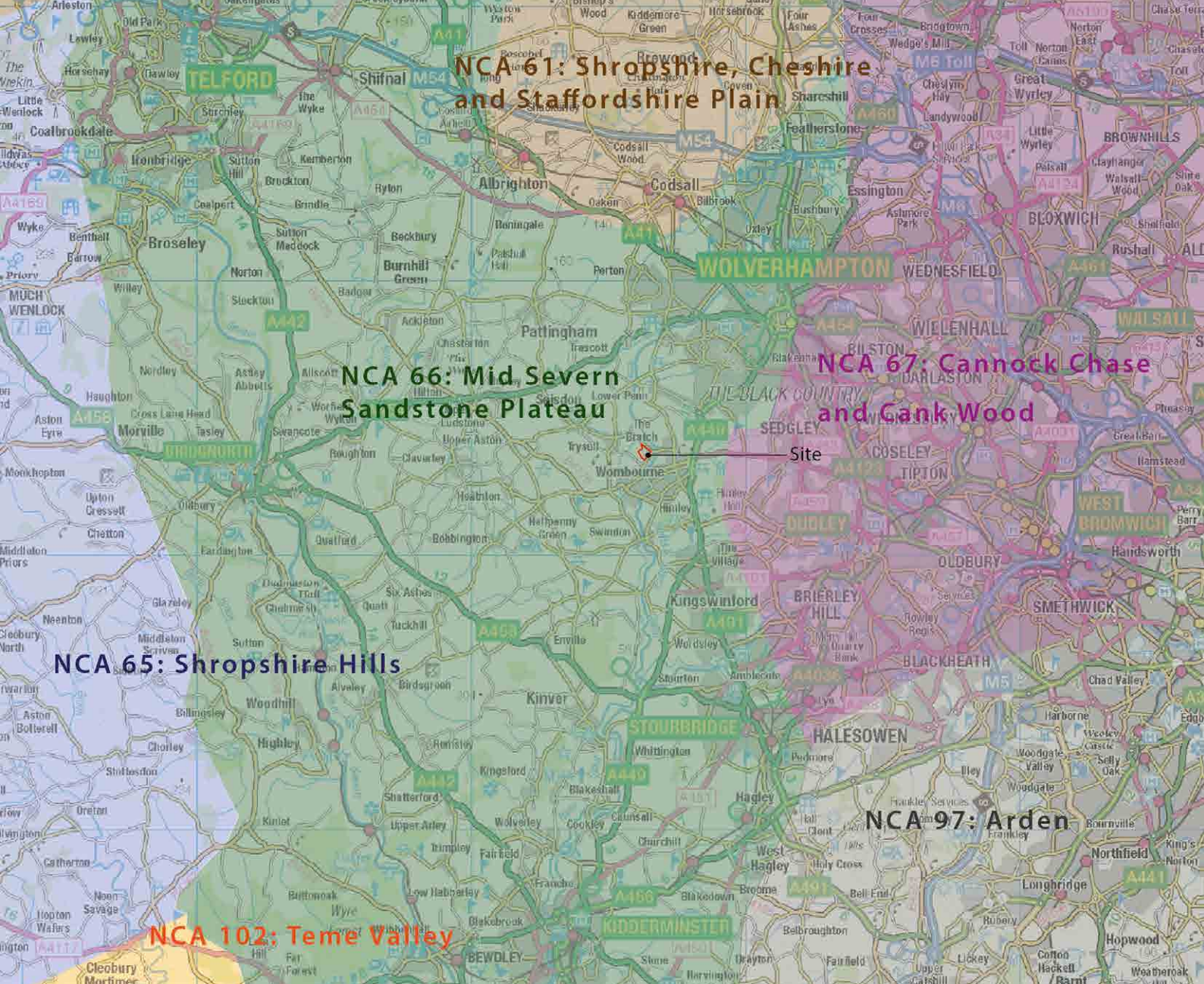
Landscape Character Assessment at a national level of study is recorded by Natural England (NE) within 159 National Character Areas (NCA). The Landscape and Visual Appraisal (LVA) contained within the Vision Document (VD) records a careful appraisal of the national level character study in relation to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

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

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

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





National Character Area Plan



Site Boundary

Natural England National Character Areas (NCA):



NCA 66: Mid Severn Sandstone Plateau



NCA 65: Shropshire Hills



NCA 102: Teme Valley



NCA 97: Arden



NCA 61: Shropshire, Cheshire and Staffordshire Plain



NCA 67: Cannock Chase and Cank Wood

2.3. Regional Landscape Character

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

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

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

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

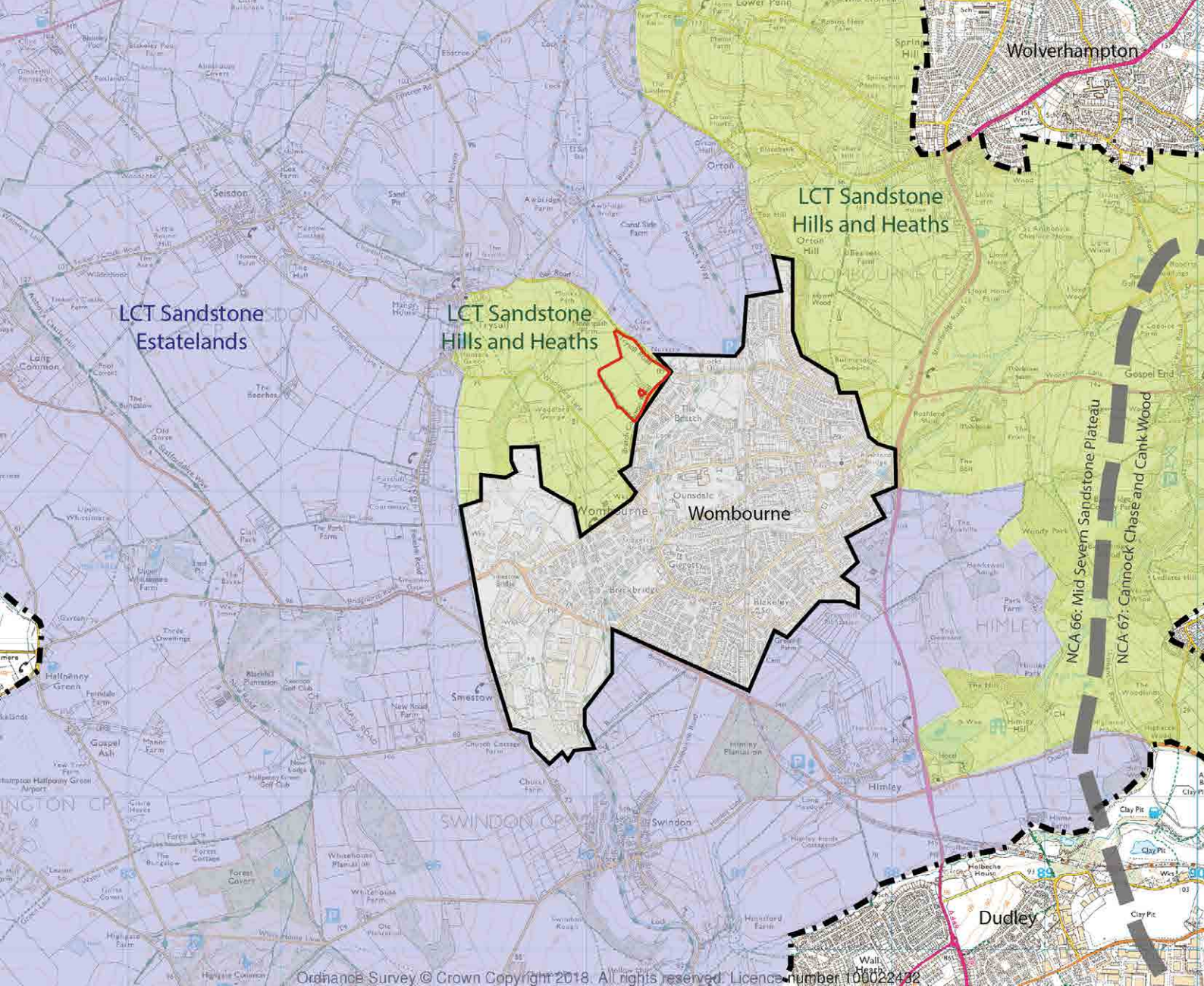
2.4. Local Landscape Character

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

Historic Environment Character Assessment: South Staffordshire (2011)




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

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



Ordnance Survey © Crown Copyright 2018. All rights reserved. Licence number 100022432

Local Landscape Character

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

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

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

Landscape Sensitivity Study (2017 Update)

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

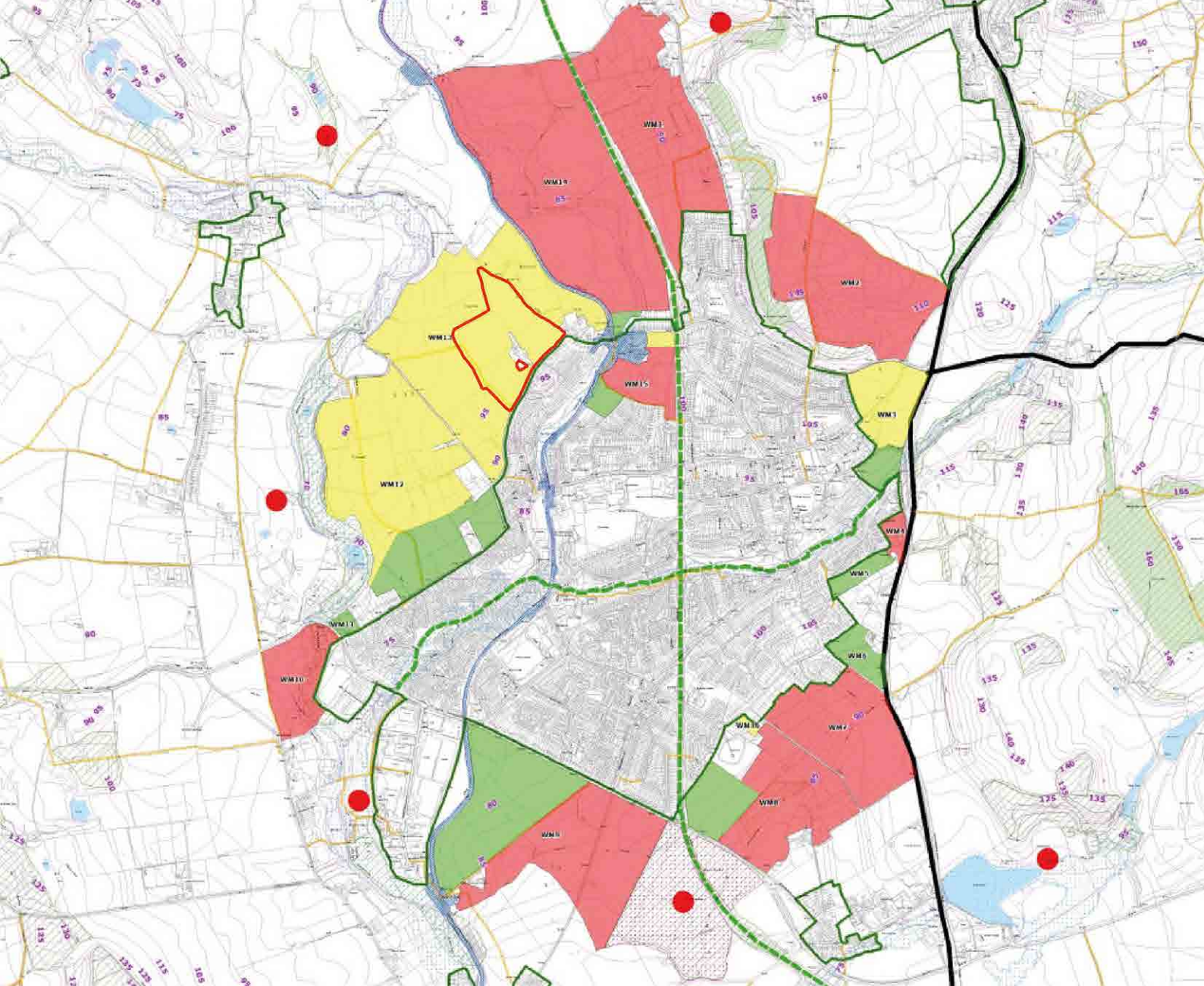
WM13 is a large LCP comprising medium to large fields with boundaries delineated by hedgerows. The land falls gently to the Smestow and forms the shallow valley side. The LCP is bordered on its south eastern and south western edges by quiet lanes. The north eastern part of the LCP is bisected by Trysull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

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

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

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

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



Landscape Sensitivity Plan

Site Boundary

Landscape Sensitivity Rating:

High

Medium

Low

2.5. Land Use and Settlement Pattern

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

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

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

2.6. Tree Cover

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

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

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

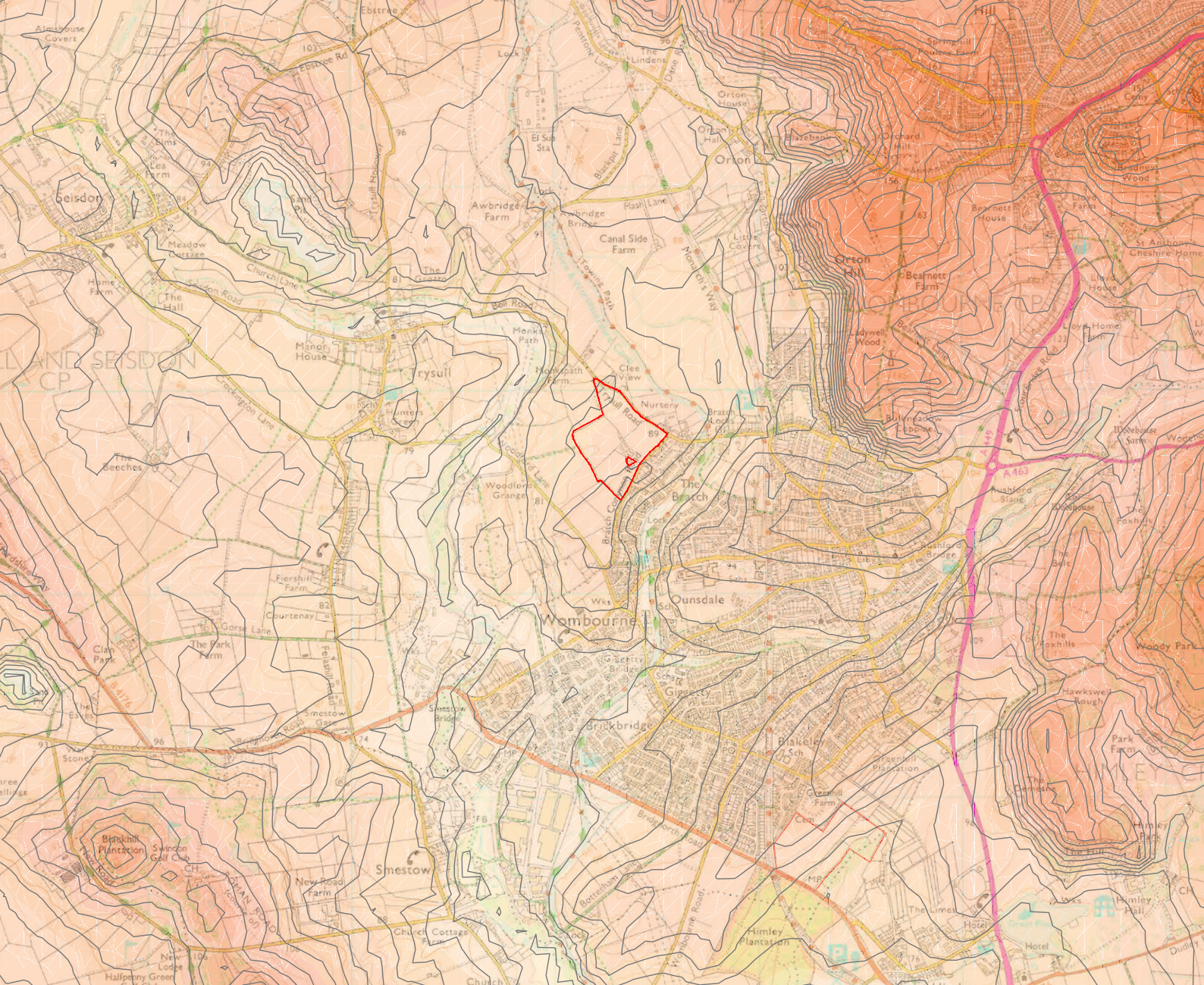
The HECA recommends the re-establishment of the historic hedgerows along their original alignments.

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

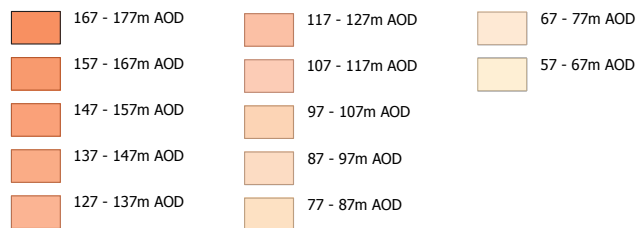
2.7. Landform

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

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



Landform of the Setting



2.8. Heritage & Archaeology

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

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

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

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

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

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

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

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

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

Opportunities

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



Bratch Locks

3. SITE ASSESSMENT

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

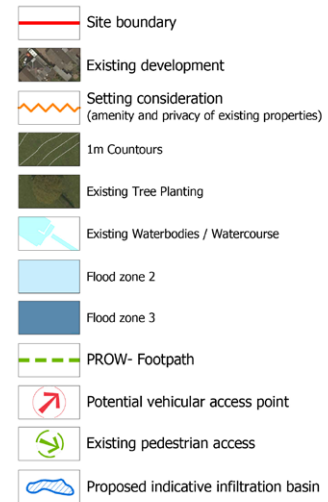
3.1. Access & Highways

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

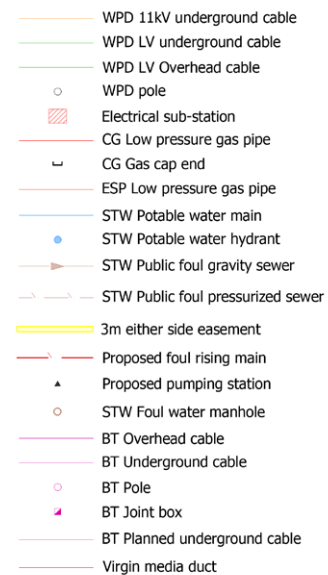
There is an opportunity to widen Bratch Common Road, which is currently of poor quality and of insufficient width in places, either within the development site frontage, or in conjunction with potential adjacent developments.

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

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



UTILITIES





3.2. Drainage & Flood Risk

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

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

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

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

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

3.3. Geo-Environmental

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

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

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

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

3.4. Arboriculture

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

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

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

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

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

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

3.5. Ecology

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

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

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

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

3.6. Utilities

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

Electricity

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

Gas

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

Potable water

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

Telecoms

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

3.7. Soils & ALC

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

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

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

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

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

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

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

3.8. Noise Assessment

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

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

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

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

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

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

3.9. Air Quality

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

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

The background levels of NO₂ and PM₁₀ are well below the background air pollutant concentration objectives according to the DEFRA Local Air Quality Management (LAQM) web pages.

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

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



3.10. Landscape Appraisal

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

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

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

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






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

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

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



Landscape Appraisal Plan

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

Baseline: Landform

-  Contours





-  Slope

Baseline: Vegetation on Site




-  Tree Cover and field trees

-  Hedgerow

Landscape Edge Characteristics

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

Local Visual Analysis

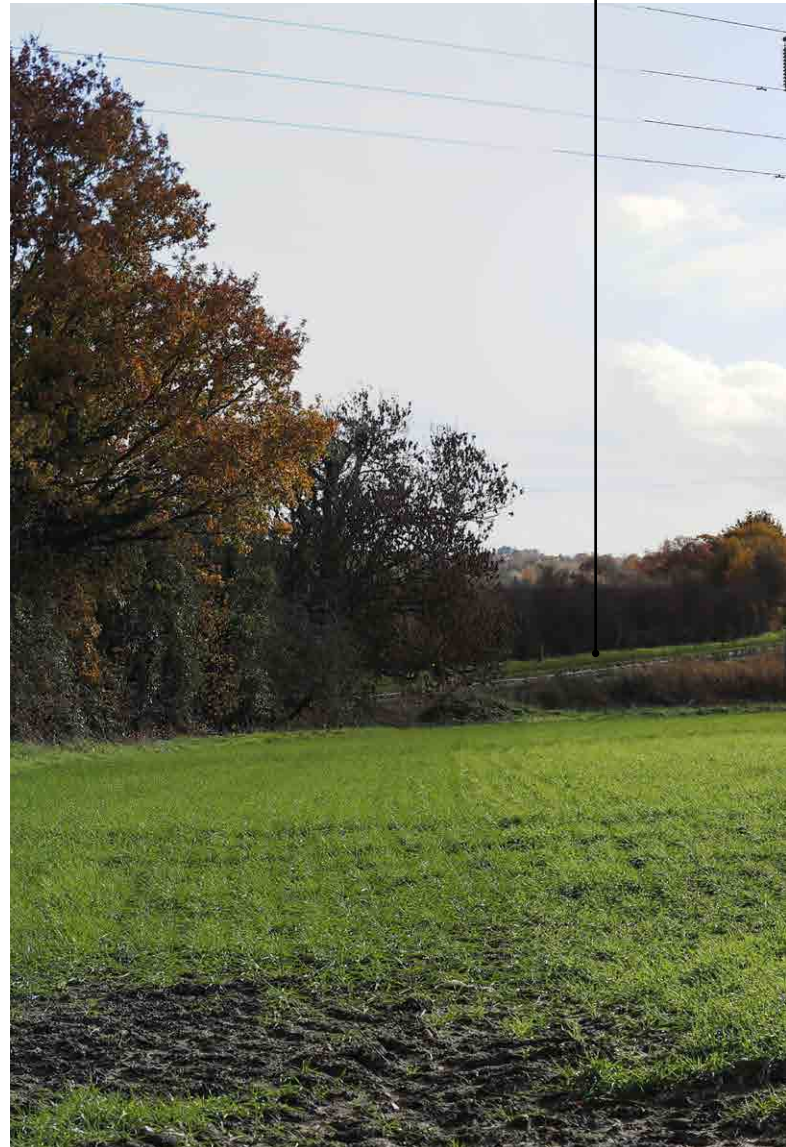
-  Clear/open Viewline
-  Filtered/Partial Viewline
-  Truncated Viewline

3.II. Views and Visual Amenity

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

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

Staffordshire and Worcestershire Canal



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



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



Site



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

Trysull



Site



Site

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



Whitehouse Plantation (135m AOD) 3km from site

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



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



Site



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



Site



4. DESIGN PRINCIPLES & CONCEPT

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

The scheme is shaped by the following design principles:

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





4.1. Landscape Strategy

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

There are three key objectives for Landscape Strategy:

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

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

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

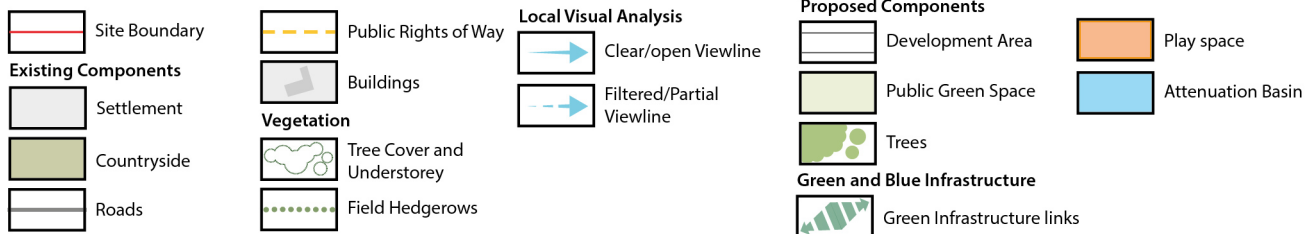
The development will be embedded within the green spaces and set back from the road, similar to the existing style, thereby creating a strong relationship with the settlement edge. New woodland planting along the northern and north-western extent of the site will create a strong relationship with the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

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

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



Landscape Strategy Plan



5. IS THE SITE DELIVERABLE?

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

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

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

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

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



6. SUMMARY OF ASPIRATIONS

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

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

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

**BARTON
WILLMORE**



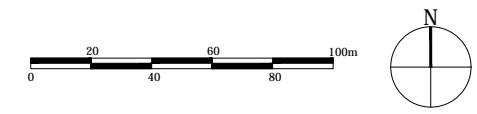
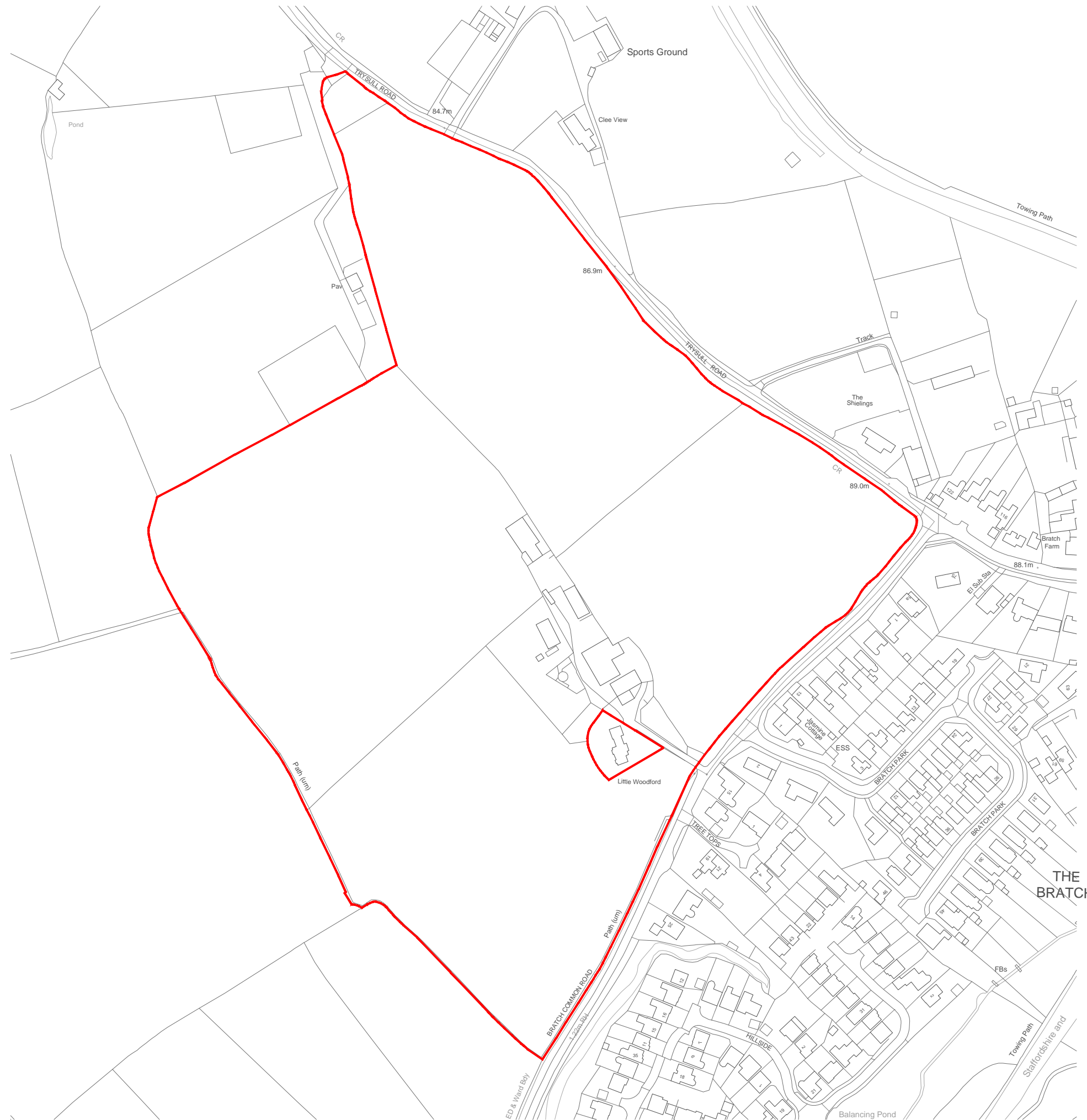
Appendix 2 – Site Location Plan

The scaling of this drawing cannot be assured

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

LEGEND

 Site Boundary
12.71 Ha



Project
**Bratch Common Road
Wombourne**

Drawing Title
Site Boundary Plan

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



Planning • Master Planning & Urban Design • Architecture •
Landscape Planning & Design • Environmental Planning • Graphic
Communication • Public Engagement • Development Economics

bartonwillmore.co.uk



Offices at Birmingham Bristol Cambridge Cardiff Ebbsfleet Edinburgh
Glasgow Leeds London Manchester Newcastle Reading Southampton

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office: Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT
We are ISO certified 9001, 14001, 45001



[Pegasus_Group](#)



[pegasusgroup](#)



[Pegasus_Group](#)

PEGASUSGROUP.CO.UK