

# Representations to the Regulation 19 Consultation of the South Staffordshire Local Plan

for  
Vistry Group Ltd  
12 December 2022  
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## Quality Assurance

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned is an appropriately qualified and experienced Chartered Planner experienced in the commercial property sector.

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## 1 INTRODUCTION

- 1.1 Rapleys LLP is instructed by Vistry Group (Vistry) to submit representations to the Regulation 19 South Staffordshire Local Plan Review Publication Plan. These representations relate to the Vistry land interests at land south of Pendeford Hall Lane, Bilbrook, where the promotion is in the form of a new residential community of circa 1,200 dwellings in total.
- 1.2 Vistry has been actively engaged in the Local Plan Review process with the submission of representations to -
- the HMA Strategic Growth Options in 2019,
  - the Regulation 18 Preferred Options consultation in November 2021,
- 1.3 These representations are made in accordance with Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012.
- 1.4 In short, Vistry objects to the Publication Plan on the basis that it does not accord with all of the tests of soundness as identified in paragraph 35 of the National Planning Policy Framework (NPPF) 2021, specifically –
1. The plan is **not positively prepared**, in the context of perceived inconsistencies in assessment and reporting procedure between the Regulation 18 and 19 process, and in respect of the Duty to Co-operate requirement,
  2. The plan is **not justified** in the context that the spatial strategy, whilst broadly appropriate, is not based on proportionate evidence and does not identify the most appropriate sites,
  3. The plan is **not effective**, as one of the chosen new settlement sites, Cross Green, is not deliverable within the plan period as it is predicated on a railway station that does not yet exist, and
  4. The plan is **not consistent with national policy** and other statements of policy as it does not deliver sustainable development.
- 1.5 The representations will set out the reasons for this in the context of:
- Failure of the Duty to Co-operate,
  - The development strategy and housing numbers,
  - The deliverability and viability of the strategic sites of Cross Green, North Penkrige and Linthouse Lane,
  - The deliverability and viability of smaller sites such as Womborne and Langley Road,
  - The appropriateness of Pendeford Hall Lane, Bilbrook as the alternative solution.

## 2 DUTY TO CO-OPERATE (DTC)

- 2.1 As referenced and set out in our Regulation 18 representations, Paragraph 24 of the NPPF states:
- "Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries."*
- Housing – Unmet Need
- 2.2 One of the key strategic matters where the co-operation between authorities is essential is unmet housing need. Paragraph 11(b) of the NPPF states:
- "Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>6</sup>"*
- 2.3 The related footnote (6) refers to paragraph 27 of the NPPF which states:
- "In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be*

*produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency”*

2.4 The Duty to Co-operate Topic Paper (Nov 2022) advises in section 5 that ‘*The GBHMA authorities are now in the process of agreeing a SoCG across the entire geography and related authorities to deliver a review of the 2018 GBHMA Strategic Growth Study to support the changing position on housing shortfalls across the housing market area. This SoCG has been drafted and is in the process of being signed off across the GBHMA*’ (my underlining). It is therefore clear that there is currently no agreed housing provision across the wider HMA.

2.5 South Staffs is not affected by National park designations, AONB designations, the Water Directive and phosphate nutrient issues, circa 80% of its administrative area lies within the West Midlands Green Belt – however, it is recognised that in order to accommodate a proportion of the GBBCHMA unmet need (even sensibly located close to the Black Country boundaries), South Staffs has no choice but to allocate sites (both for its own needs and those of the GBBCHMA) within the Green Belt.

2.6 In this context, whilst it is commendable that the Council is still proposing to accommodate some 4,000 houses of unmet need, and that, as the Council, says at paragraph 5.6 of the Topic Paper and paragraph 5.16 of the Local Plan, there has been broad support from the other authorities for this, it does not negate the fact that the 4,000 is based on earlier study assumptions, with no consensus on the overall shortfall of provision within the GBBCHMA. Vistry is supportive of the principle and sentiment, but not necessarily the level of provision. This is because there is no certainty that the quantum of housing for which the Council is planning is actually sufficient.

2.7 Furthermore, it is important to highlight that the level of collaboration with other GBBCHMA authorities to date, **still** falls short of the requirements of the DTC as set out in both the NPPF and PPG. The reality is that very little has actually changed since the publication of the Regulation 18 Plan in 2021. Paragraph 27 of the NPPF requires the SOCG to be agreed, to be produced and publicly made available. This is still outstanding and therefore, Vistry consider that the Plan is unsound on the basis that it is not ‘positively prepared,’ which paragraph 35 (a) of the NPPF defines as –

*“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”*

#### Infrastructure (Delivery Plan)

2.8 The other important part of the DTC is in respect of infrastructure delivery and the impact on infrastructure arising as a result of the location of the proposed new development – in particular that based around transport, both road and rail, and how that infrastructure is to be provided/funded.

2.9 South Staffs is well connected with several main railway lines stopping within in or immediately adjacent to its boundaries, and both the M54 (west-east) and the M6 North-south) dissect the Council area.

2.10 The Infrastructure Delivery Plan (IDP), as it was in 2021 at the time of the Regulation 18 Plan publication, is still prepared on the basis of the unresolved uncertainty regarding the overall unmet housing requirement need.

2.11 In addition, whilst there has been dialogue as part of the DTC, it is clear that the Regulation 19 sites have been allocated without regard (or little regard) to highway modelling – paragraphs 5.22-23 of the IDP refers. This is not only risky in terms of potential need for significant and costly improvements, but is also contrary to the PPG which states paragraph 059 (Reference ID: 61-059-20190315):

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

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

2.12 As noted above in the PPG, the DTC extends to other infrastructure providers. The DTC Paper lists all the bodies that the Council has consulted/collaborated with. One glaring omission is Network Rail/Rail

Operators. This is particularly important in the context of the delivery of Cross Green (in whole or in part), one of the strategic allocations – further detail and commentary on this is provided in paragraphs 3.10-3.16 below.

- 2.13 In short, the lack of a SOCG, whether that be in the context of the GBBCHMA housing need or in terms of infrastructure provision with key providers/service delivery organisations/etc raises questions about the delivery of some of the allocations either in their entirety, or in part within the plan period. This goes to the heart of the soundness or otherwise of the plan.
- 2.14 Vistry considers that the Plan is unsound in this context as it is not ‘positively prepared’ and it is not ‘justified’ (i.e., based on proportionate evidence base).

### 3 DEVELOPMENT STRATEGY / HOUSING NUMBERS

#### PLAN PERIOD

- 3.1 Vistry has no issue with the proposed plan period for growth (2018-2039). Planning for the twenty-one-year period to 2039 is appropriate. The plan is sound in this respect.

#### HOUSING NUMBERS AND DEVELOPMENT STRATEGY

- 3.2 Vistry support the general level of housing for its own needs to be provided within the plan period in the context that it is a reflection of the latest Standard Methodology requirements of 4,097 dwellings per annum, albeit this should be seen as **the minimum** to be provided to allow for slippage or sites not coming forward.
- 3.3 Vistry note that the Council has maintained its commitment to providing some 4,000 houses to accommodate the unmet need arising from the GBBCHMA. Whilst Vistry is generally supportive of this principle of the Council providing for neighbouring unmet need, as set out above, it has concerns in respect of the level of that provision. Furthermore, it is not clear which allocated sites or locations (beyond two obvious ones Linthouse Lane and Langley Road) are making this provision. Vistry consider in the interests of transparency, that this should be made clear in the Plan.
- 3.4 The table below sets out the Council’s identified housing provision to be delivered within the plan period.

Location of Development	Proposed housing numbers 2018-2039
Standard Method requirement (2022-2039)	4,097
Completions since the start of the plan period	992
Additional housing to contribute towards unmet needs within the wider Greater Birmingham and Black Country HMA	4,000
<b>Total requirement to be planned for</b>	<b>9,089</b>
Tier 1 villages	4,160
Tier 2 villages	1,647
Tier 3 villages	609
Tier 4 villages	43
Tier 5 villages and other settlements	258
Employment led growth at Cross Green	1,200
Linthouse Lane	1,200



Location of Development	Proposed housing numbers 2018-2039
Land at Langley Road	390
Land south of Stafford	81
Windfall sites	600
<b>Total proposed</b>	<b>10,188 (circa 11.4% overprovision)</b>

3.5 The broad thrust of the development strategy (Local Plan paragraph 5.23 refers) focusses on dividing the overall housing requirement '*sustainably to reflect the settlement hierarchy, the GBBCHMA Strategic Growth Study, environmental constraints and policy factors*'. The result is a strategy that broadly accords with the NPPF paragraph 60 - a combination of urban brownfield sites, sites adjacent to the existing urban area (urban expansion), employment led growth, and neighbourhood plan sites in rural service centres/villages with larger allocations in the higher order settlements. Site size is varied and should ensure that there is a consistent supply of housing being delivered over the 2039 Plan period (notwithstanding that Vistry question the deliverability of some of the sites (see later comments)).

3.6 The 2039 Plan proposes to focus the majority of its housing requirement within four new strategic sites, 'strategic' because of the level of specific infrastructure identified to support them (roads, education and community facilities); masterplans are therefore also required:

- Land north of Penkridge (1,129 dwellings) – Tier 1 settlement expansion outside of the Green Belt
- Land at Cross Green (1,200 dwellings) – employment-led/infrastructure-led growth
- Land at Linthouse Lane (1,200 dwellings) – expansion of Black Country urban area
- Land east of Bilbrook (848 dwellings) – Tier 1 settlement expansion in the Green Belt

3.7 It is recognised by Vistry that there is an inherent finite capacity for development within smaller settlements before other options have to be considered to accommodate the growth required, although Vistry maintain that further expansion of Bilbrook/Codsall, given its sustainable credentials (two stations, a high level of facilities and proximity and ease of access to I54) that further expansion of Bilbrook is considered possible and sustainable. The housing requirements for future plans are likely such that this can realistically only be accommodated through the development of new settlements. The Plan puts down a marker in this regard, with the inclusion of a policy for the identification of a new settlement for a future plan review.

3.8 However, the crux of these Vistry representations in respect of Development Strategy is that the allocation of a number of the sites (particularly the strategic ones) have considerable constraints that affect their housing capacities that have not been fully recognised. As a result, they are not fully deliverable and therefore not the most appropriate locations for the development. The 2039 Plan is unsound in this respect.

Land at Cross Green

3.9 Land at Cross Green is proposed as an 'employment led new settlement/site,' rather than an urban extension. Such a classification is rather strange, given that the allocation does not actually include any employment provision within it. Vistry consider that the specific allocation at Cross Green, through the policies MA1 and SA2 is unsound. This is because there is no certainty of its delivery within the plan period arising from:

- The anticipated timescales of key transport infrastructure directly affecting, and required for the site, and the lack of transparent evidence around this,
- Uncertainty on the actual yield of the site, and
- Resulting design, layout and severance issues which lead to a less than sustainable development.

#### *Transport Infrastructure*

3.10 It is not clear from the policy or supporting text whether the development of the site is reliant on the delivery of the new railway station and associated park and ride. The Policy requires land to be safeguarded for this purpose, with the accompanying text suggesting that this would provide an 'integrated transport hub' linking with bus, cycling and walking facilities.

- 3.11 The main access serving the site is to be a new road link from the A449. Vistry note that this now has a planning permission ((20/0113/out) granted 14 October 2022) as part of the hybrid application for the 160,000sqm of E(g), B2, B8 employment development at the nearby FOI Featherstone. The access is a roundabout junction on the A449 with a 7.3m wide carriageway through the allocation site, over the West Coast Mainline Railway and into the Featherstone employment area.
- 3.12 The aforementioned permission, and its Transport Assessment, inevitably because of the timing of the application submission, does not include any allowance or assumptions for a development of 1,200 houses and/or a 500 space rail based park and ride station now required by the Local Plan. The planning permission requires development to commence within the standard 3year timescale, and although this access was submitted in full, conditions still require considerable detailed submission to be agreed with the highway Authority, and presumably Network Rail in respect of the overbridge to the mainline railway.
- 3.13 With the application, there is a noticeable lack of consultation or correspondence or reference to Network Rail and train operating companies within the planning application documentation.
- 3.14 Unfortunately, this is also reflected in the Local Plan preparation. This is important, as dealing and negotiating with Network Rail is notoriously difficult. Engagement will need to be two-fold, on a Property and Technical basis.
- 3.15 From a Property perspective there is no evidence that (i) the costs associated with the 'shared' value (ransom) payment that will be needed to be agreed with Network Rail to cross the mainline, has been accounted for in any viability study, (ii) that the cost of the on-site infrastructure necessary to cross the railway (and underground existing power supplies) has been accounted for including (a) the payment of an 'Easement Fee' which has to be negotiated by the Developer (whilst Network Rail will not fetter the delivery of employment or housing, they are obliged, as a public entity, to get best value from granting rights over the railway), and (b) a 'maintenance payment' which is compensation for ongoing monitoring for future maintenance usually sought from the Developer for a considerable period of time – there will be a cost to the housing development notwithstanding the separate permission for the access road over the railway.
- 3.16 From Technical perspective, whilst there has clearly been some discussion with Network Rail, given the principle of a park and ride station (known as the Brinsford park and ride) has been muted for some time, including the adopted Core Strategy, this only goes so far. There does not appear to have been any concrete commitment to its construction and delivery. The IDP identifies the delivery partners as 'the developer, Network Rail, Rail Operators, Midlands Connect and Staffordshire County Council.' No timescales are identified, although 'the latest' Outline Business Case for it has been produced this year. In terms of the DTC, there is no evidence of any SOCG with any of the delivery parties, and indeed, as identified in paragraph 2.12 of these representations, neither Network Rail nor the train operating companies receive a mention in the DTC Topic Paper. Similarly, the Outline Business Case does not appear to be publicly available.
- 3.17 Without surety of the delivery of the station, the precise form this will take, etc, Vistry suggest that it is very difficult to properly masterplan, design and deliver the allocated site within the plan period.

#### *Housing Yield and Design*

- 3.18 Whether or not the strategic housing site is dependent on the delivery of the rail park and ride, there are considerable implications for the proper master planning of the site which could affect the actual numbers of dwellings that could be delivered on the site. The critical impacts are summarised as –
- Whether the consented access road and roundabout is of sufficient width/size, capacity to accommodate the level of housing and the park and ride traffic AS WELL AS the consented Featherstone employment development (160,000sqm of floorspace),
  - Unknown extent of noise mitigation/off-sets that will be required not only in relation to the road, but also the roundabout, along the railway itself, and relative to the park and ride car park,
  - Considerable land take for the road is necessary to accommodate the embankments required to achieve appropriate clearance over the railway. Is there sufficient depth of site to allow for junctions off into the site before the need to rise over the bridge?
  - Severance of the southern part of the site from the remainder where all the key new infrastructure facilities and services will be located, leading to less than sustainable development and a likely increase in car usage within the development itself, and
  - Extent of the land within flood zones 2 and 3.



- 3.19 Severance and permeability are major planning and design issues that arise within the site.
- 3.20 The masterplan policy MA1 requires the submission and approval of a site wide masterplan, however, there is no clarity on the timing of this – whether this is in advance of any planning application or whether it can be submitted with any outline or full application. It also requires at (j) a strategy for a site wide design code, which will need to be consulted on and approved prior to any application permission, although the clause in the policy is less than clear and explicit about this, and at (l) a site-specific infrastructure delivery schedule setting out broad triggers for critical infrastructure delivery.
- 3.21 It is Vistry's submission that these master planning requirements cannot start to be progressed at least until there is confirmation that the rail park and ride, and main access infrastructure has been confirmed. Without this, the delivery of , 1,200 dwellings through comprehensive and co-ordinated place making is compromised.

#### Land North of Penkridge

- 3.22 This site is 51ha in size and sits to the north of Penkridge, which is a tier one town. Whilst a tier one town, there are limited facilities within Penkridge with just local convenience store.
- 3.23 Whilst the concept plan identifies the fairly recent anaerobic digestion plant to the northeast of the site, there is little if no consideration of the implications of this through design. The concept plan proposes house up to this boundary.
- 3.24 The digestion plant was first approved in 2016 and revised in 2019. These facilities are subject to stringent safety precautions and large buffer areas (cordon sanitaire) due to their operations which can generate odour, noise and significant HGV movements. When permitted, the LPA noted the rural nature of the surrounding and this fed into the reason for approval.
- 3.25 Any new strategic housing scheme directly adjacent to such a sensitive industrial use would therefore need to take into account this use and the associated large buffer area. Given the lack of evidence, it is clear that detailed consideration has not been carried out and therefore capacity of the allocation may be significantly reduced .
- 3.26 It is also important to note, that Penkridge is almost entirely reliant on the A449 for access. This is a single carriageway road running north south through the centre of Penkridge. It is noted that the site is located in close proximity to the M6, however junctions 12 and 13 are both located in the region of 4km away to the south and north. This would result in all vehicles utilising the A449 single carriageway road for access. Vistry accept that public transport may help to mitigate this impact partially, particularly the local train station, however the location and nature of the allocation means that, given the lack of parking at the train station, and the travel distance of 1.5km, many new residents are likely to commute via car.
- 3.27 Comments made in relation to MA1 above, equally apply to this site, raising questions over timing of delivery of the site within the plan period.
- 3.28 Based on the above, and given the number of uncertainties, Vistry maintain that it is not possible to determine the level of housing and development that the allocation can provide and deliver by 2039. It is highly likely that the total capacity will be far below the 1,129 currently proposed.

#### Land at Linthouse Lane

- 3.29 Unlike Penkridge, Linthouse Lane is located on the southern boundary of South Staffordshire abutting the existing urban area of Wolverhampton. It is rectangular in size and abuts the City of Wolverhampton on three sides (west, south and east).
- 3.30 The site is 94.1 ha and identified as providing 1,976 dwellings in total, although it is considered that only 1,200 can be provided by 2039. Given its location adjacent the GBBCHMA it is highly likely that this site fulfils part of the unmet need requirement, although this is not explicitly stated in the Plan.
- 3.31 The site is surrounded on three sides by residential development which would be accessed via Linthouse Lane, and Kitchen Lane, to the west and south, both C roads and Blackhalve Lane to the north which is a B road. Whilst surrounded by urban development, the nearest large retail centre is in Wolverhampton centre, a distance of nearly 4km away.
- 3.32 It must be acknowledged that all of the impact on services and facilities will be felt by Wolverhampton City Council. Policy DS5 states that:

*“As part of delivering these sites, the council will work cross-boundary with infrastructure bodies and statutory partners to ensure these sites are supported by any necessary infrastructure”*

3.33 Policy SA3 goes on to refer to a transport/movement strategy which states:

*“A transport/movement strategy which includes consideration of access onto Linthouse Lane, Blackhalve Lane and Kitchen Lane and appropriate public transport provision to support sustainable travel from the scheme; and high quality active travel links through and beyond the site, integrating the existing public rights of way running through the site and providing links to Ashmore Park and facilities to the west of the site.”*

3.34 As set out at para 2.11 above, there has been dialogue as part of the DTC, however it is clear that the Regulation 19 sites have been allocated without regard (or little regard) to highway modelling, as referenced in paragraphs 5.22-23 of the IDP.

3.35 Given the size of the site and the poor surrounding highways infrastructure, there is easily a possibility that mitigation will be required and that it may not be possible given the constraints of surrounding urban development.

3.36 The site is also located within the green belt and the submitted evidence prepared by Land Use Consultants Ltd confirmed that the harm of removing this site from green belt to be high.

3.37 Comments made in relation to MA1 above, are equally applicable to this allocation, raising questions over timing of the delivery of the site within the plan period.

3.38 With all of the above in mind, it is highly possible that the final capacity may be reduced and therefore the overall number of houses provided falls short of the allocation requirement.

#### Langley Road

3.39 The site at Langley Road, (site reference 582), is proposed to accommodate 390 houses presumably as part of the GBBCHMA unmet need as it abuts the GBBCHMA boundary (specifically Dudley). A large portion of the site appears to contain surface water/ponds. There are also large areas of overgrown scrub. Furthermore, the site sits adjacent to an electric substation and it is highly likely that any housing development will be required to leave a buffer around the electric substation for safety purposes. When these constraints are considered, along with the WW2 gun battery, the developable area is likely to be significantly reduced, impacting on the overall site capacity.

#### Womborne

3.40 South Staffordshire also propose to direct 825 houses or 8% of the total housing delivery figure in Womborne. This is a tier 2 village with limited facilities, which are mainly small scale convenience stores, with no established centre. Access is reliant on bus services and the A449 Stourbridge Road. The new housing allocated (site ref 463), is also proposed to be removed from the green belt despite it having a moderate harm to the green belt. In addition, the housing sites 285/459, also contain three parallel high voltage electricity power lines running across the site meaning that significant mitigation would be required and again potentially affecting site capacities.

3.41 Vistry considers that Tier 2 (and below) settlements cannot sustainably accommodate such large increases in housing and that a proportion of this should be directed back to sustainable Tier 1 settlements, notably Bilbrook.

#### SUMMARY OF DEVELOPMENT STRATEGY POSITION

3.42 In summary, given all of the uncertainties identified above in relation to a number of the allocated housing sites, Vistry maintain it is impossible to determine the level of housing and development that the allocations can provide per se, let alone delivery in the plan period to 2039. It would appear that additional land is likely to be required to deliver the overall housing requirement.

3.43 The Plan and specifically policies DS4, DS5, MA1, SA2, SA3, SA4 and SA5 (the latter as it relates to Womborne) is unsound in this respect as it is not positively prepared or fully justified.

## 4 THE CASE FOR LAND SOUTH OF PENDEFORD HALL LANE, BILBROOK

4.1 In contrast to the situation with Cross Green and the other identified sites, the Vistry site at Pendeford Hall Lane is both viable and deliverable within the 2039 Plan period. The following key points prevail –

- It is not dependent financially on the delivery of major road or rail infrastructure ,

- Consequently, the site can start to deliver housing earlier in the plan period, and will therefore be able to deliver the full requirement of 1,200 dwellings by 2039,
- It fits perfectly with the development strategy of the local plan, providing a sustainable new settlement adjacent to Bilbrook/Codsall, which is the key service centre of South Staffordshire,
- All of the land required to enable the development of a new settlement is in the control of a national housebuilder/master developer who is used to bringing development of this scale forward,
- It is unconstrained environmentally,
- It is unconstrained by any need to divert utilities or services,
- Its unconstrained nature means that it can be designed with certainty that the full complement of housing as well as all associated services, access road, education, recreation and community requirements can be achieved,
- Its viability means that it can deliver policy compliant levels of affordable housing, and
- It has no access constraints and is predicated on a clear access and mobility strategy which enshrines the principles of safe, sustainable travel.

4.2 Vistry consider that the joint settlements of Bilbrook/Codsall can accommodate additional housing over and above the proposed allocations. Therefore, the site at Pendeford Hall Lane would be an ideal candidate to supplement the current sites allocated and make up for the shortfall arising from capacity concerns on the other identified sites as referenced in section 3 above.

## 5 PROCEDURAL INCOSISTENCIES

### CONSISTENCY WITH POLICY

5.1 The following points are of note and render the Plan unsound –

- The 2039 Plan is consistent with preparatory policy timescales as set out in the adopted Core Strategy December 2012, however -
  1. It falls short as it does not plan effectively for deliverable sustainable development within the plan period arising from the delivery of major infrastructure required to make the emerging plan strategy sustainable,
  2. Paragraph 5.15 of the 2039 Plan acknowledges *“it is still clear that a significant housing shortfall is likely to remain across the GBBCHMA, although its exact extent is not currently known. The council and other GBBCHMA partners recognise the need to update the GBBCHMA Strategic Growth Study 2018 to ensure a comprehensive picture of unmet needs and locations for growth is provided. This work, once completed, will help to inform the need for and scope of future reviews of the Local Plan and the council will continue to play a proactive part in cross-boundary agreements to address the housing shortfalls”*. This is not consistent with the NPPF or PPG. Furthermore, Vistry do not consider that this is a sound reason or basis on which to plan development for the next 17 years,
  3. There are undoubtedly finite capacities attributable to the sites, but a number of the allocations have major question marks over their ability to deliver the numbers attributable to them within the plan (see earlier paragraphs of this representation). The allocation of Pendeford Hall Lane would provide South Staffordshire Council with certainty of housing numbers and their delivery within the 2039 Plan period and for the years beyond.

5.2 The 2039 Plan is unsound and not consistent with national policy as it cannot deliver sustainable development within the stated timeframe.

### POLICY MAP INSERTS AND ALLOCATIONS

5.3 In Appendix B of the Local Plan there are a series of master planning proformas which include plans of the proposed allocations. The plans are not clear in terms of what is the precise area of the allocation to be delivered. An area of housing allocation is shown, together with ‘Green Infrastructure,’ which, in each case, is outside the area identified in red for the allocation. However, the policies in each case include the provision of green infrastructure. What is the purpose of the areas of green infrastructure outside the allocation boundary and how will it be delivered if it is not part of the allocation?

5.4 Vistry consider that the actual allocation boundaries should be comprehensive in their nature and encompass everything within them that is required to be provided as part of the policy.

5.5 The Plan is unsound in this respect as it is not effective.

## 6 CONCLUSIONS

6.1 The foregoing commentary, has demonstrated that there are real and legitimate concerns over the Duty To Co-operate, the Infrastructure Delivery Plan and the wider development strategy/housing numbers for several of the key proposed allocations–

- The level of collaboration with other GBBCHMA authorities to date, falls short of the requirements of the DTC as set out in both the NPPF and PPG,
- The lack of a SOCG, whether that be in the context of the GBBCHMA housing need or in terms of infrastructure provision with key providers/service delivery organisations/etc raises questions about the delivery of some of the allocations either in their entirety, or in part within the plan period,
- The IDP is still prepared on the basis of the unresolved uncertainty regarding the overall unmet housing requirement need. Whilst there has been dialogue as part of the DTC, it is clear that the Regulation 19 sites have been allocated without regard (or little regard) to highway modelling. This is contrary to the PPG,
- The Plan is predicated on the delivery of a new train station at Cross Green Strategic Site that does not yet exist and where there are questions over its future funding and timescales. It is Vistry's submission that master planning requirements cannot start to be progressed at least until there is confirmation that the rail park and ride, and main access infrastructure has been confirmed. Without this, the delivery of 1,200 dwellings through comprehensive and co-ordinated place making within the plan period is compromised,
- There is uncertainty on the actual yield of many of the sites such as Cross Green, Land North of Penkridge, Linthouse Lane and Langley Road and the resulting design, layout and severance issues which would lead to a less than sustainable development,

The master planning proformas which include plans of the proposed allocations are not clear in terms of what is the precise area of the allocation to be delivered. An area of housing allocation is shown, together with 'Green Infrastructure,' which, in each case, is outside the area identified in red for the allocation.

6.2 Consequently, the policies DS5, MA1, SA2, SA3, SA4 and SA5 as part of the 2039 Plan's development strategy, are unsound as it is -

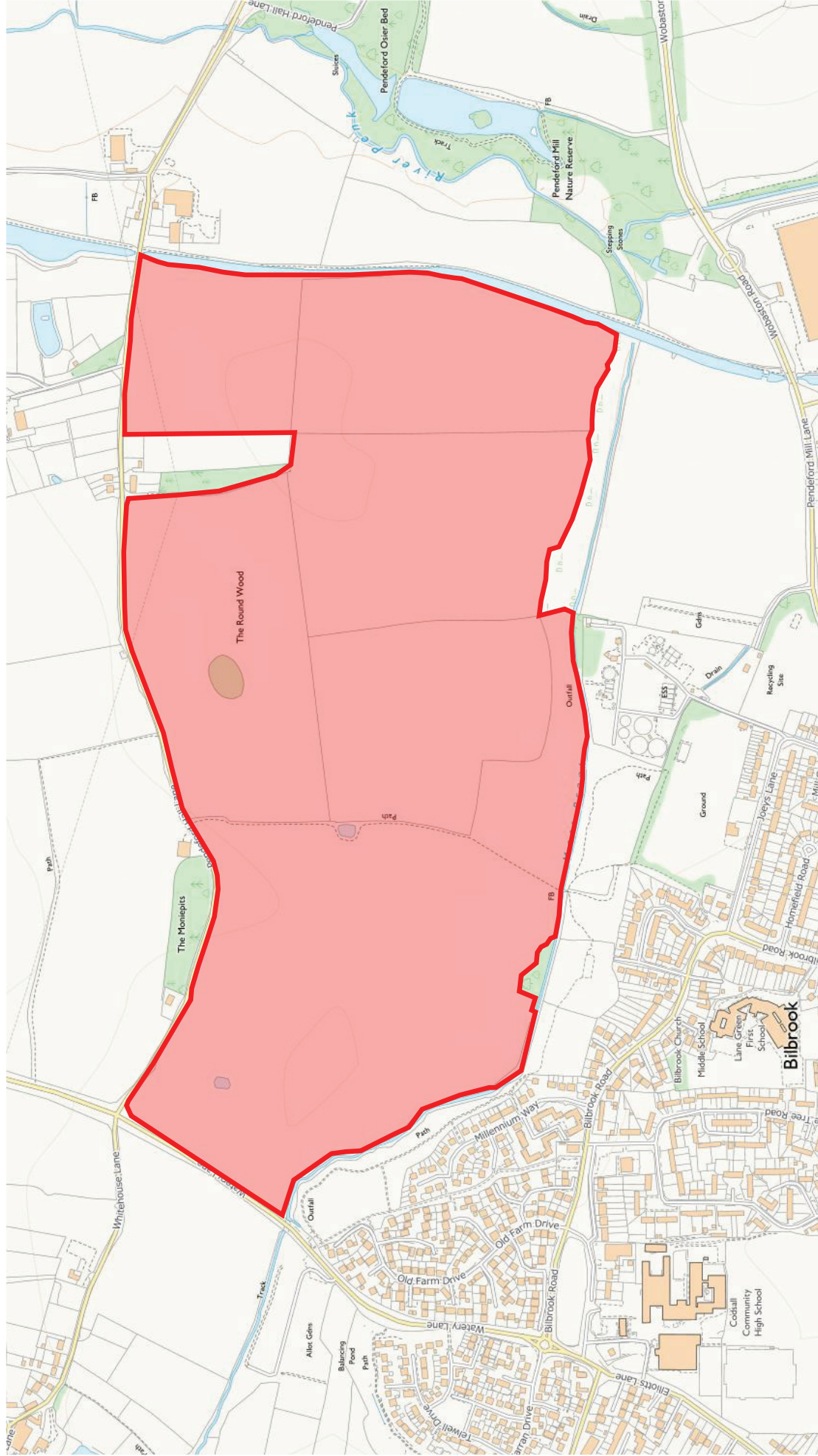
- Not positively prepared,
- Not justified as it is not based on proportionate evidence is not the most appropriate site,
- Not effective, as it is not deliverable within the plan period as there are many unknown issues which would seriously impact on-site deliverability such as a new station (Cross Green) that does not yet exist, and
- Not consistent with national policy in enabling the delivery of sustainable development.

6.3 In order to make the 2039 Plan sound, the above policies should

- be reworded to reflect the constraints and the resulting reduced anticipated yields, and
- the resulting shortfall of housing be made up through the identification/allocation of the site at Pendeford Hall Lane.

# Appendix 1 - Location/Site Plan





# Appendix 2 - Vision Strategy



LAND SOUTH OF PENDEFORD  
HALL LANE, BILBROOK

# VISION DOCUMENT

Vistry Group



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# VISION STATEMENT

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

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

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

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

# 01. INTRODUCTION

## 1.1 DOCUMENT OVERVIEW

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

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

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

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

# 02. PLANNING POLICY

## 2.1 PLANNING POLICY CONTEXT

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

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

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



# 03. VISTRY GROUP

## 3.1 WHO WE ARE

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

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



Meridian Water, Enfield



Winchester Village, Winchester



Public open space



White Rock, Paignton

3.2 WHAT WE DO

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



### 3.3 A PARTNER YOU CAN TRUST





### 3.4 TRACK RECORD AND DELIVERY



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



Steadings, Essington (231 homes)



Stanton Cross, Wellingborough (3,500 homes)



Fletcher's Rise, Wombourne (90 homes)



The Pavillions, Kenilworth

# 04. SUSTAINABILITY

## 4.1 SUSTAINABILITY STRATEGY

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

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

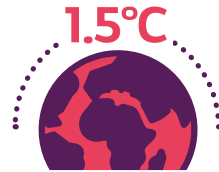
Our strategy launched in 2021 and is focussed on three priority areas of People, Operations and Homes & Communities.

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

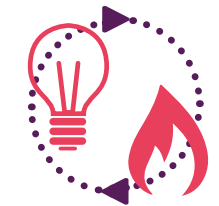
## 4.2 OUR OPERATIONS

### Climate Change

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



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



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



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

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

## 4.3 WASTE & RESOURCES

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



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



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



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





## 4.4 OUR HOMES AND COMMUNITIES

### Placemaking

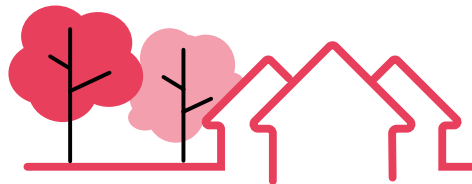
Our approach to placemaking is designed to improve people’s quality of life and support our customers health and wellbeing.

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



Twigworth Green, Twigworth

S106



Netherhall Park, Great Barr

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



The Green, Winchester Village

### Nature

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

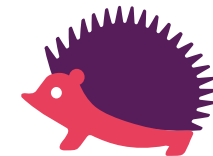
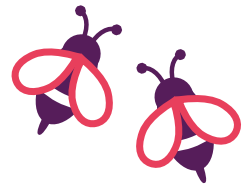
Ahead of a 10% biodiversity net gain being mandated by the emerging Environment Bill, we are seeking to assess and future-proof our schemes.



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



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



### Future Homes Standard

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

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

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



Unwrapped home, Emmbrook Place

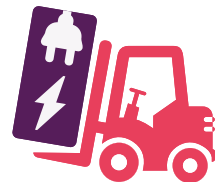


The Future Homes Standard; Proposed changes to Part L



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

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



## 4.5 AFFORDABLE HOUSING & PLANNING OBLIGATIONS

# Vistry Partnerships

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

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



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



# 05. A SUSTAINABLE LOCATION

## 5.1 A SUSTAINABLE SETTLEMENT

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

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

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

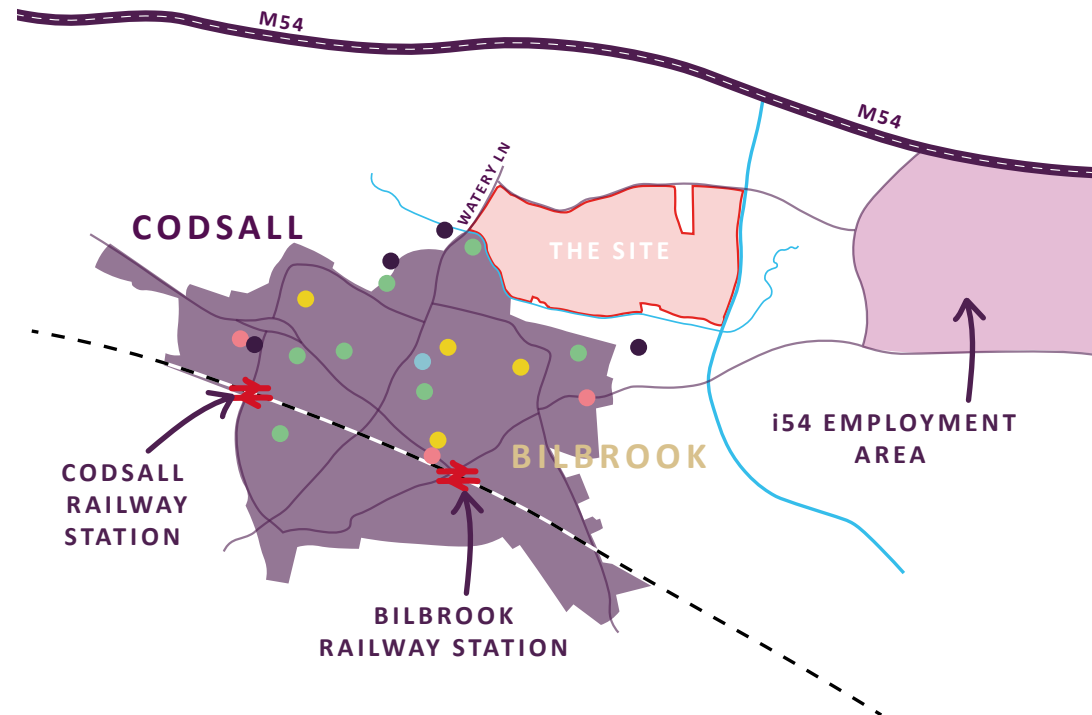
There are a large number of employment opportunities in the local area, which include the i54 employment area and Owens Trading Estate, both of which are located just to the east of the Bilbrook/Codsall area. Part of the i54 employment area is home to the Jaguar Land Rover’s Engine Manufacturing Centre,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

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

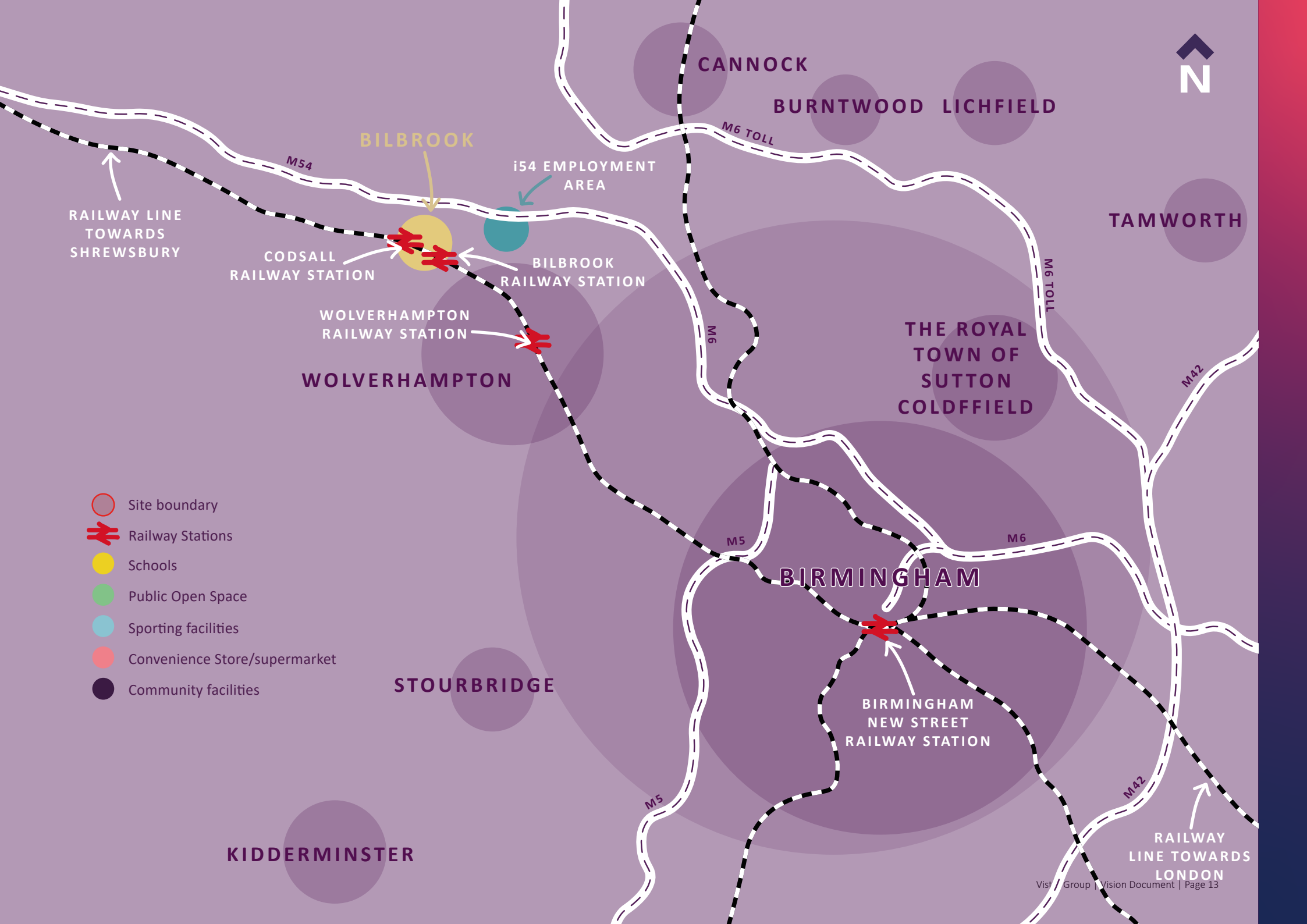
The Site has good access to the wider highway network and public transport links, and offers a sustainable and accessible location for housing growth.



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







CANNOCK  
BURNTWOOD LICHFIELD

TAMWORTH

BILBROOK

i54 EMPLOYMENT AREA

RAILWAY LINE TOWARDS SHREWSBURY

CODSALL RAILWAY STATION

BILBROOK RAILWAY STATION

WOLVERHAMPTON RAILWAY STATION

WOLVERHAMPTON

THE ROYAL TOWN OF SUTTON COLDFIELD

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

STOURBRIDGE

BIRMINGHAM

BIRMINGHAM NEW STREET RAILWAY STATION

KIDDERMINSTER

RAILWAY LINE TOWARDS LONDON

## 5.2 THE SITE

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

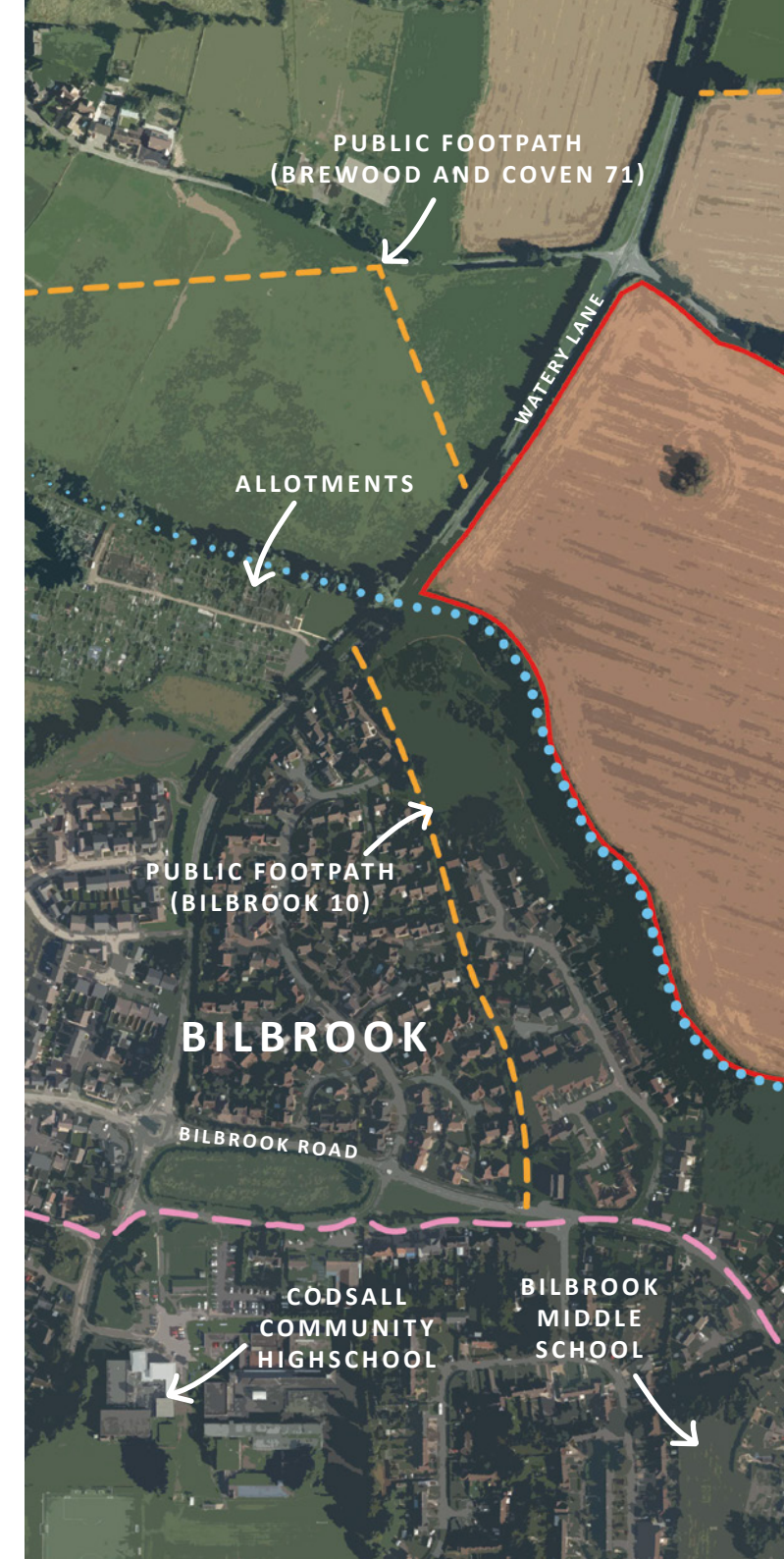
The Site's eastern boundary is partially delineated by a hedgerow and some hedgerow trees following the bank of the Shropshire Union Canal, with the rest of the boundary open along the bank of the canal.

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

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

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

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







PUBLIC FOOTPATH  
(BREWOOD AND COVEN 68)

PENDEFORD HALL LANE



PUBLIC FOOTPATH  
(BREWOOD AND  
COVEN 45)

THE SITE

SHROPSHIRE  
UNION CANAL



POND

PUBLIC FOOTPATH  
(BILBROOK 2)

MOAT BROOK

WWTW

RECREATION  
GROUND


ALLOTMENTS


RECYCLING CENTRE



# 06. SITE CONSIDERATIONS

## Opportunities and Influences


 Site Boundary: **Aprx. 77.39ha**


 Existing bus route and bus stops

 Existing railway line and station

 Existing retail centre


 Employment site


 Open space


 Nearby facilities


### OPPORTUNITIES

 Potential vehicular access point

 Potential secondary/emergency access point


 Green infrastructure


 Opportunity to reinforce boundary planting


 Potential main walking/cycling routes


 Potential location of Primary School

 Potential location of Local Centre

 Potential locations for drainage (SuDS) basins

 Potential locations for wildlife ponds


 Potential locations for interpretation boards

 Potential location for play areas (LEAP, NEAP, MUGA)

 Potential location for allotments

 Potential location for sports pitches


### INFLUENCES


 300m offset from waste water treatments works


 Contours


 National Cycle Route 81

 Public Footpaths

 Bridleways

 Bilbrook Jubilee Way

 Extent of flood zone


 Existing water features


 Existing trees and hedgerows

### DESIGNATIONS

 Green Belt

 Canal Conservation Area

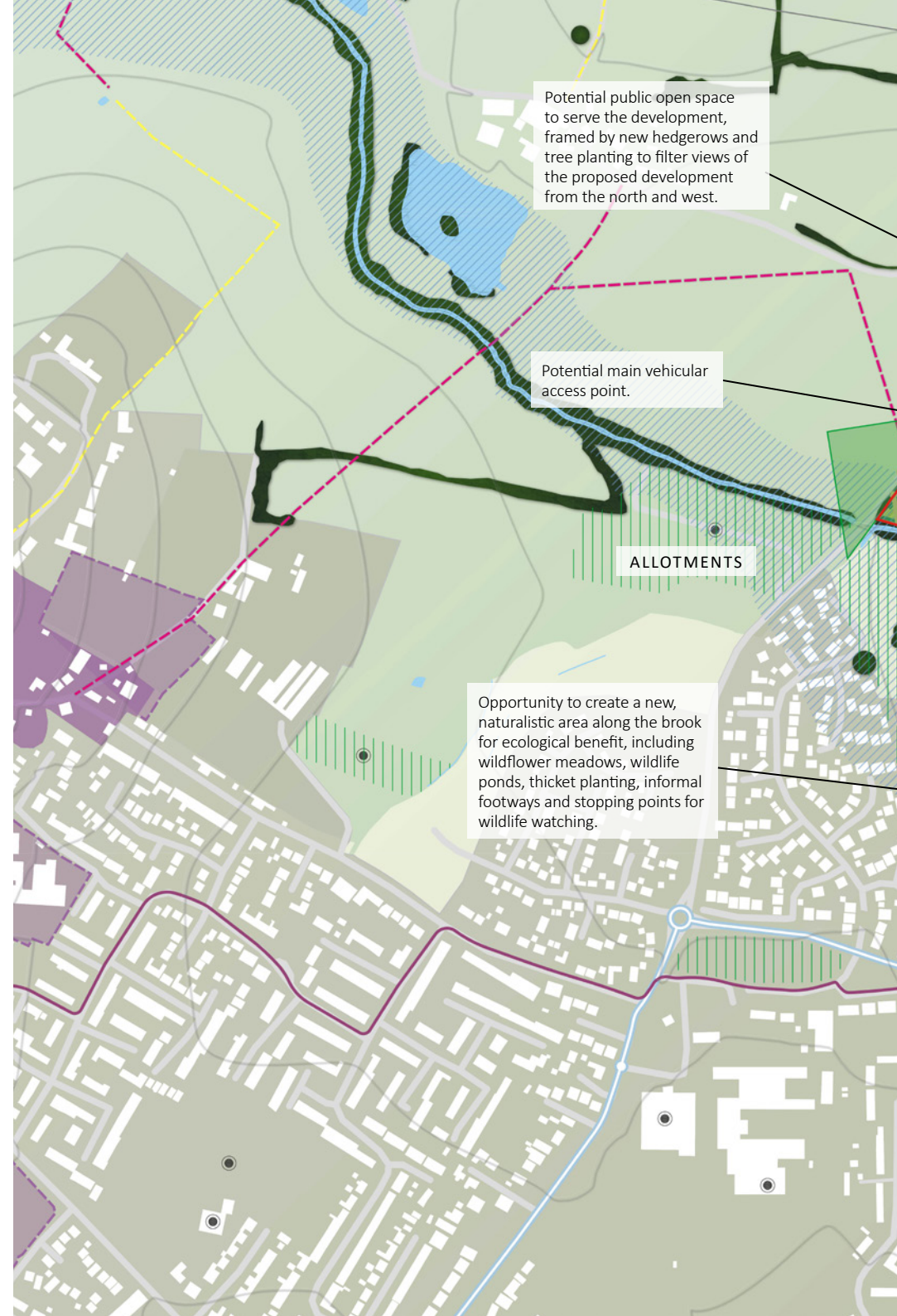
 Codsall Bilbrook Oaken Conservation Area

 Codsall Bilbrook Oaken Conservation Area Buffer Zones

 Listed Buildings

### UTILITIES

 Low voltage overhead power lines







Potential secondary/emergency access point.

Potential location for Primary School.

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

Potential secondary vehicular access point.

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

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

WATERY LANE

MOAT BROOK

WATER WASTE TREATEMENT AREA

SHROPSHIRE UNION CANAL

Grade II Listed Shropshire Union Canal Aqueduct

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

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

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

Potential location for SuDS features.

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

## 6.1 LANDSCAPE AND GREEN BELT

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

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

## 6.2 HERITAGE

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





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

### 6.3 ECOLOGY

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

### 6.4 TOPOGRAPHY

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



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

### 6.5 ODOUR

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

### 6.6 FLOOD RISK

































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

### 6.7 ACCESS AND MOVEMENT

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

# 07. WHAT COULD THE SITE DELIVER?

## Concept Masterplan

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



Main vehicular access point.

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

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

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





Potential secondary/emergency access point.

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

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

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

Secondary vehicular access point.



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

WATERY LANE

MOAT BROOK

SHROPSHIRE UNION CANAL

Grade II Listed Shropshire Union Canal Aqueduct

LOCAL CENTRE

SPORTS PITCHES

ALLOTMENTS

WILDLIFE AREA

COMMUNITY ORCHARD

WATER WASTE TREATMENT AREA

LEAP

LEAP

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

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



## 7.1 PLACEMAKING

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

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

## 7.2 BIODIVERSITY AND GREEN INFRASTRUCTURE

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

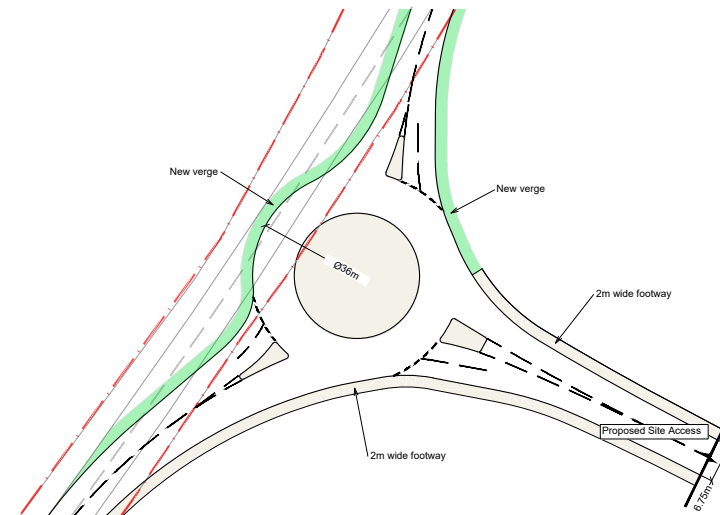
The new open spaces will help to retain and enhance the Site's existing landscape features, maintain habitat connectivity and enhance the Site's overall biodiversity value.

## 7.3 COMMUNITY FACILITIES

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

## 7.4 VEHICULAR ACCESS

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



## 7.5 PEDESTRIAN AND CYCLE CONNECTIVITY

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

## 7.6 PUBLIC TRANSPORT / MOBILITY HUB

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



Source: CoMoUK

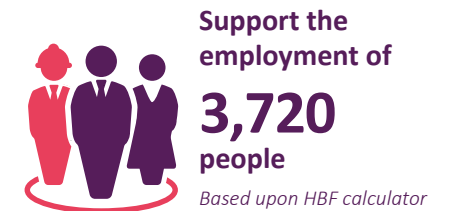
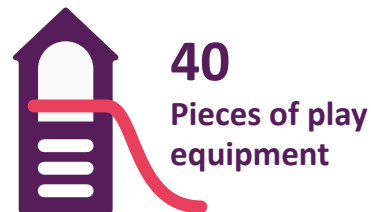
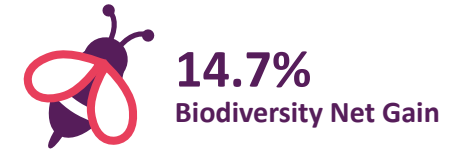
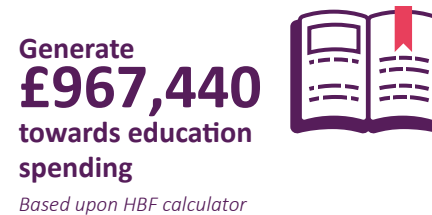
## 7.7 DRAINAGE

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

# 08. CONCLUSIONS

## 8.1 KEY BENEFITS

The key benefits of the proposals are summarised below:







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



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

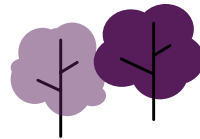
Sustainable links  
and easy access  
to adjacent major  
**employment**  
areas



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



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



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

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

## 8.2 CONCLUSIONS

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

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

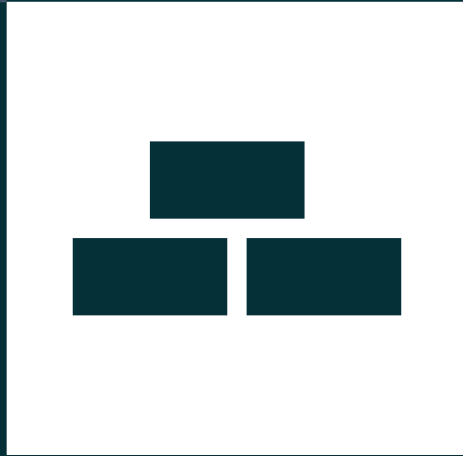
The Site is viable, achievable, realistic, logical and deliverable- it is unfettered being in one ownership and under the control of a single experienced developer. The Site represents an ideal opportunity to assist South Staffordshire Council in fulfilling its housing needs and those of the wider housing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

# Vistry Group

Vistry Group Strategic Land December 2021







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