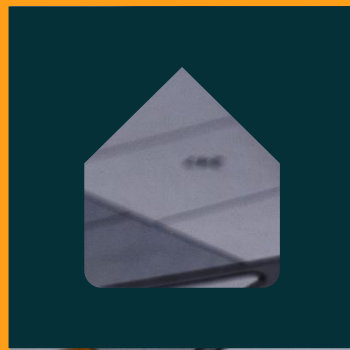


Representations to the Regulation 19 Consultation of the South Staffordshire Local Plan

for
Vistry Group Ltd
24 May 2024
Our Ref: SRS/19-03075/Reg19



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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 Surveyor/Planner [delete as appropriate] experienced in the commercial property sector.

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[SarahRSmith \(May 24, 2024 10:42 GMT+1\)](#)

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Partner – Planning Division

Signature: 

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, and
 - the Regulation 19 Submission consultation, December 2022.
- 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) 2023, specifically –
- The plan is **not positively prepared**, in the context of the Duty to Co-operate requirement and the proposed provision of minimal unmet need requirements,
 - The plan is **not justified** in the context that the spatial strategy, whilst broadly appropriate, is not based on proportionate evidence, does not identify the most appropriate sites, and provides no justification for the unmet needs provision,
 - The plan is **not effective**, as it is not deliverable within the plan period as there are many unknown issues which would seriously impact on-site deliverability and
 - 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 deliverability of the development strategy and chosen sites, and
 - 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 co-operation between authorities is essential is unmet housing need. Paragraph 26 notes that ongoing joint-working is *'integral to the production of a positively prepared and justified strategy'* and would help determine *'whether development needs that cannot wholly be met within a particular plan area could be met elsewhere'*.
- 2.3 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 areas⁶"*
- 2.4 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"*.
- 2.5 It is acknowledged that the Council has over the years been working collaboratively with the adjacent authorities, particularly the GBBCHMA. However, agreements through statements of common ground

(SoCG) are now a necessity. The Duty to Co-operate Topic Paper (April 2024) advises in Appendix A that '*South Staffordshire wrote to all authorities within the GBBCHMA in October 2023 setting out that it was revising its strategy and asked for their initial views on this revised approach.*'

- 2.6 This altered approach, capacity-led focussing on absolute minimal Green Belt release resulting in a nominal 640 dwellings contribution to the GBBCHMA unmet need is not backed up by any signed, completed SoCG. Indeed, there does not appear to be any evidence that the authorities have either responded to or agreed to the South Staffordshire approach to, or the figure, of the unmet need.
- 2.7 The 640 unmet need provision is acknowledged. However, it does not in any way negate the fact that the 640 is a considerable reduction from the 4,000 previously proposed and at time when housing need and the unmet need from neighbouring authorities has only increased - the Strategic Housing Topic Paper and the Duty To Cooperate Topic Paper, April 2024 paragraph 5.3 notes that Wolverhampton alone has a shortfall of 11,413 and the GBBCHMA Position Statement Addendum, April 2023, Appendix 2 only serves to emphasise the scale of the problem. It is impossible to see how the principles of such a reduction can possibly be justified.
- 2.8 Vistry is supportive of the principle and sentiment of providing for unmet need, but not the level of provision. This is because the quantum of housing for which the Council is planning is wholly insufficient at least as far as the unmet need is concerned. The need does not disappear because of changes in the NPPF. Unfortunately, without a sensible national approach to reviewing the Green Belt and a regional approach to housing requirements, it is inevitable that Council's will look to provide minimum levels of housing, or a capacity-led 'bottom up' approach given, in particular, the Green Belt constraint.
- 2.9 Furthermore, it is important to highlight that 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 reality is that very little has actually changed since the publication of the Regulation 18 Plan in 2021 and indeed, the previous Regulation 19 Plan in 2022. There has been no movement or published update to the GBBCHMA Housing Supply and Need Position Paper despite increasing shortfalls of delivery, collaboration on the Black Country Plan has broken down and each of the three BC authorities is 'going it alone'. Fundamentally, paragraphs in the NPPF on DTC and protection of Green Belt effectively produce a conflicting position that Council's like South Staffordshire have to navigate. Notwithstanding this, Paragraph 27 of the NPPF still 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"*
- 2.10 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

PLAN PERIOD

- 3.1 Vistry has no issue with the proposed plan period for growth, now proposed at 2023-2041. Anticipated adoption is 2026 and assuming this occurs, then the Plan will meet the minimum 15 post adoption requirement of paragraph 22 of the NPPF. The plan is sound in this respect, provided it is adopted in 2026.

HOUSING NUMBERS

- 3.2 Vistry does not dispute the general level of housing the Council is proposing 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 4,086 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 original commitment to providing for some 4,000 houses to accommodate unmet need arising from the GBBCHMA has now been reduced to 640. Whilst Vistry is generally supportive of the principle of providing for neighbouring unmet need, it strongly objects to the vast reduction in unmet need provision, given the overall and increasing GBBCHMA shortfall and any subsequent lack of agreement to this reduced figure by the GBBCHMA Councils. Furthermore, the figure of 640 in Policy DS4 appears to have been arrived at simply as a consequence of the capacity of the sites chosen to meet its own identified needs and the capacity-led development strategy it has chosen to pursue. Whilst to a certain extent this is a product of the changes to the NPPF, it should not negate the

requirement to plan effectively for increasing housing needs. It is effectively an arbitrary number/provision. Furthermore, it is not clear which allocated sites or locations are making this provision. Vistry considers, 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 with the plan period.

Location of Development	Proposed housing numbers 2018-2039
Standard Method requirement (2023-2041)	4086 (227p/a)
Additional housing to contribute towards unmet needs within the wider Greater Birmingham and Black Country HMA	640
Total requirement to be planned for	4,726
Tier 1 villages	3,153 (60.6%)
Tier 2 villages	913 (17.6%)
Tier 3 villages	228 (4.4%)
Tier 4 villages	30 (0.6%)
Tier 5 villages and other settlements	194 (3.7%)
Land south of Stafford	81 (1.6%)
Windfall sites	600 (11.5%)
Total proposed	5,199 (circa 10% overprovision)

3.5 The broad thrust of the preferred development strategy is on a capacity-led approach focussing growth to sustainable non-Green Belt sites (at suitable existing safeguarded land sites), sustainable open countryside sites, brownfield sites and limited Green Belt development in Tier 1 settlements well served by public transport and that will deliver key infrastructure priorities such as primary schools.

3.6 The 2041 Plan proposes to focus the majority of its housing requirement within two 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 Penkrige (1,129 dwellings) – Tier 1 settlement expansion outside of the Green Belt
- 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.

3.8 However, the crux of these Vistry representations in respect of Development Strategy is that a number of the allocated sites have considerable constraints that affect their housing capacities that have not been fully recognised. Furthermore, various policy requirements (as set out below) will potentially also have implications for achieving the full site capacities identified within the plan period. As a result, they are not fully deliverable within the plan period raising questions as to whether they are in fact the most appropriate locations for the development. The 2041 Plan is unsound in this respect.

Policy MA1

3.9 Policy MA1 requires the submission and approval of site wide masterplans for the strategic sites to precede the submission of planning applications, or as part of that planning application process. They will be a material consideration in the determination of the planning applications for the strategic sites. Approval prior to the submission of planning applications in particular, has the potential to delay delivery

of these strategic housing allocations within the plan period, thereby running the risk of the Council not delivering the 1,877 dwellings identified as coming forward from them. Vistry considers that the 10% buffer of overprovision is therefore not sufficient to overcome the consequence of this potential non-delivery or shortfall in delivery from the two strategic sites within the plan period.

Policy NB2 and DS2

- 3.10 Policy NB2 requires a minimum of 10% biodiversity net gain in accordance with the Environment Act 2021 with the sequential hierarchy of provision focussing on-site wherever possible. It is not clear to what extent the site capacities of the allocated sites (strategic or otherwise) have taken this into account – this is particularly pertinent to those allocated sites brought forward from the adopted Site Allocation Document given this predates the Environment Act.
- 3.11 Policy DS2 specifically requires Green Belt compensatory requirements and states that these *'should be in addition to other local plan standards'*. There is a locational sequential approach to this provision, starting with land adjacent to an allocated Green Belt site.
- 3.12 Policy SA1(e) requires compensatory Green Belt improvements on land identified as off-site green infrastructure to the south of the allocation, but the policy wording is somewhat ambiguous in relation to whether this land is /can be used for biodiversity net gain as well, and whether Green Belt improvements constitute biodiversity net gain or vice versa.
- 3.13 In the context of the above, Vistry consider that there is no assurance that the 10% BNG on-site first principle has been factored into the site capacity estimates.
- 3.14 This similarly applies to SA2 Penkrudge where the off-site green infrastructure identified area is to be used for a Country Park.

Land North of Penkrudge

- 3.15 This site is 51ha in size and sits to the north of Penkrudge, which is a tier one town. Whilst a tier one town, there are limited facilities within Penkrudge with just local convenience store.
- 3.16 Whilst the concept plan identifies the fairly recent anaerobic digestion plant to the north-east 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.
- 3.17 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.
- 3.18 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 .
- 3.19 It is also important to note, that Penkrudge is almost entirely reliant on the A449 for access. This is a single carriageway road running north south through the centre of Penkrudge. 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.
- 3.20 Comments made in relation to MA1 and NB2 above, apply to this site, raising questions over capacities and timing of delivery of the site within the plan period.
- 3.21 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 2041. It is highly likely that the total capacity will be below the 1,029 currently proposed.

Policy SA3 Housing Allocations

- 3.22 Policy SA3 identifies a number of housing allocation that are carried forward from the 2018 adopted Site Allocations Document on safeguarded land, for example, in Codsall (584), Womborne (280), Cheslyn Hay/Great Wyrley (218).

3.23 It is some six years since these sites were allocated/identified, and yet the majority have not come forward for development. Vistry considers this raises questions about their realistic deliverability and capacities within the plan period. For example –

Womborne

3.24 South Staffordshire also propose to direct 5.7% 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 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.

3.25 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.

Codsall -Land at Keepers Lane/Wergs Hall Road

3.26 Some 317 dwellings are proposed to come forward at this site.

Summary of Development Strategy position

3.27 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 2041. It would appear that additional land is likely to be required to deliver the overall housing requirement.

3.28 The Plan, its Development Strategy and specifically policies DS4, DS5, MA1, SA2, SA3 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 2041 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 at least 1,200 dwellings by 2041,
- 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 CONCLUSIONS

5.1 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,
- There is uncertainty on the actual yield of many of the sites such Land North of Penkrige, Womborne,etc when constraints and other policy requirements such as 10% BNG and the resulting design, layout and severance issues are taken into account which would lead to a less than sustainable development,
- There is uncertainty over the safeguarded land sites coming forward within the plan period bearing in mind the fact that even after six years of allocation in the SAD, there has been little or no movement on them.

5.2 Consequently, the Plan in the context of policies DS4, DS5, MA1, SA2, SA3, as part of the 2041 Plan's development strategy, is unsound as it is -

- Not positively prepared,
- Not justified as it is not based on proportionate evidence is not the most appropriate sites,
- Not effective, as it is not deliverable within the plan period as there are many unknown issues which would seriously impact on-site deliverability, and
- Not consistent with national policy in enabling the delivery of sustainable development.

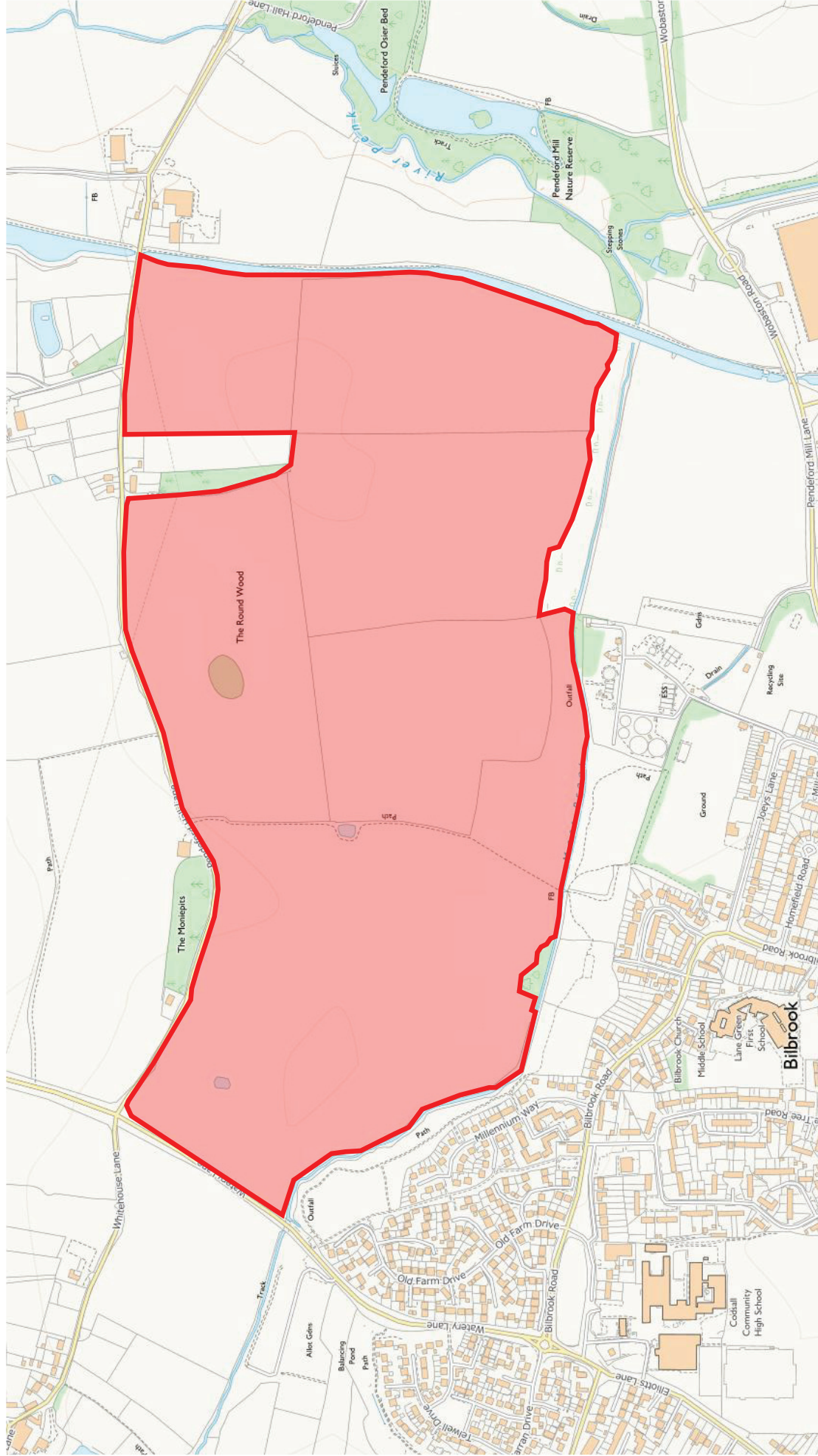
5.3 In order to make the 2041 Plan sound, the above policies should -

- 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

Site Location Plan





Appendix 2

Vision Document



LAND SOUTH OF PENDEFORD
HALL LANE, BILBROOK

VISION DOCUMENT

Vistry Group



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VISION STATEMENT

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

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

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

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

01. INTRODUCTION

1.1 DOCUMENT OVERVIEW

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

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

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

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

02. PLANNING POLICY

2.1 PLANNING POLICY CONTEXT

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

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

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

03. VISTRY GROUP

3.1 WHO WE ARE

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

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



Meridian Water, Enfield



Winchester Village, Winchester



Public open space



White Rock, Paignton

3.2 WHAT WE DO

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



3.3 A PARTNER YOU CAN TRUST



3.4 TRACK RECORD AND DELIVERY



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



Steadings, Essington (231 homes)



Stanton Cross, Wellingborough (3,500 homes)



Fletcher's Rise, Wombourne (90 homes)



The Pavillions, Kenilworth

04. SUSTAINABILITY

4.1 SUSTAINABILITY STRATEGY

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

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

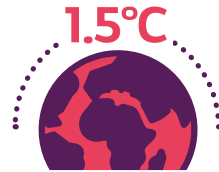
Our strategy launched in 2021 and is focussed on three priority areas of People, Operations and Homes & Communities.

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

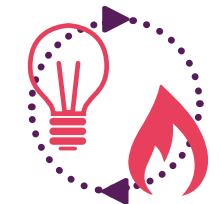
4.2 OUR OPERATIONS

Climate Change

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



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



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



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

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

4.3 WASTE & RESOURCES

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



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



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



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



4.4 OUR HOMES AND COMMUNITIES

Placemaking

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

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



Twigworth Green, Twigworth



Netherhall Park, Great Barr

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



The Green, Winchester Village

Nature

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

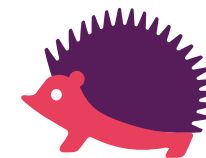
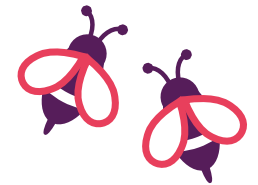
Ahead of a 10% biodiversity net gain being mandated by the emerging Environment Bill, we are seeking to assess and future-proof our schemes.



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



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



Future Homes Standard

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

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

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



Unwrapped home, Emmbrook Place

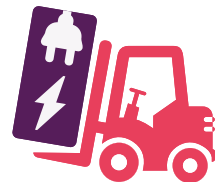


The Future Homes Standard; Proposed changes to Part L



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

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



4.5 AFFORDABLE HOUSING & PLANNING OBLIGATIONS

Vistry Partnerships

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

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



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



05. A SUSTAINABLE LOCATION

5.1 A SUSTAINABLE SETTLEMENT

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

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

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

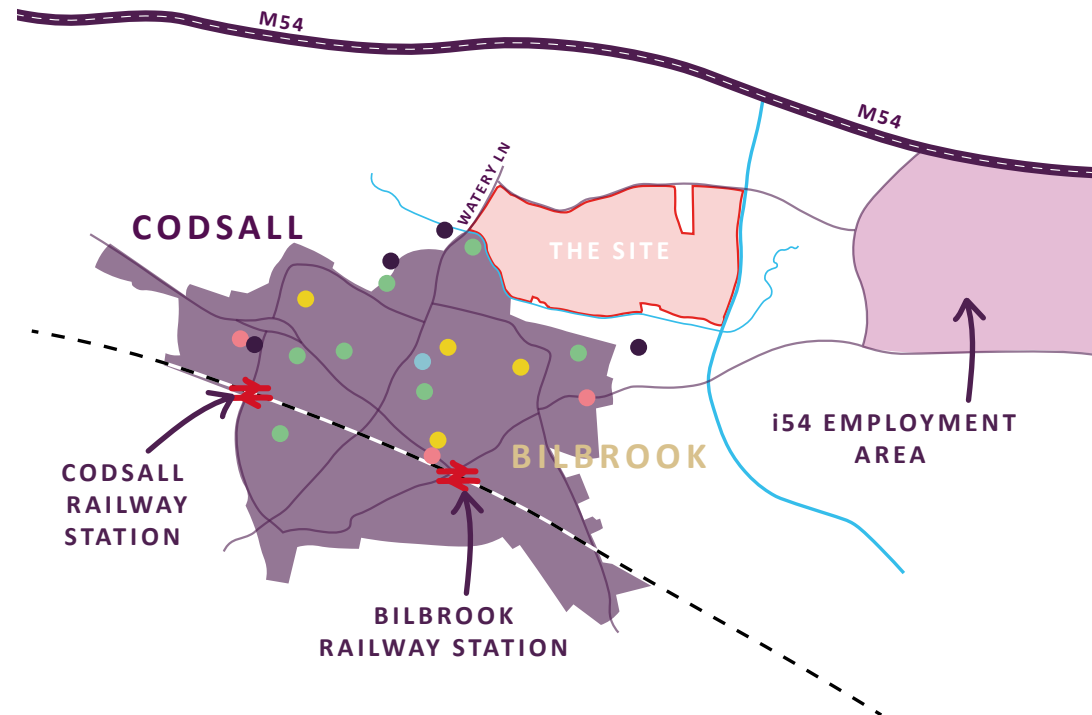
There are a large number of employment opportunities in the local area, which include the i54 employment area and Owens Trading Estate, both of which are located just to the east of the Bilbrook/Codsall area. Part of the i54 employment area is home to the Jaguar Land Rover’s Engine Manufacturing Centre,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

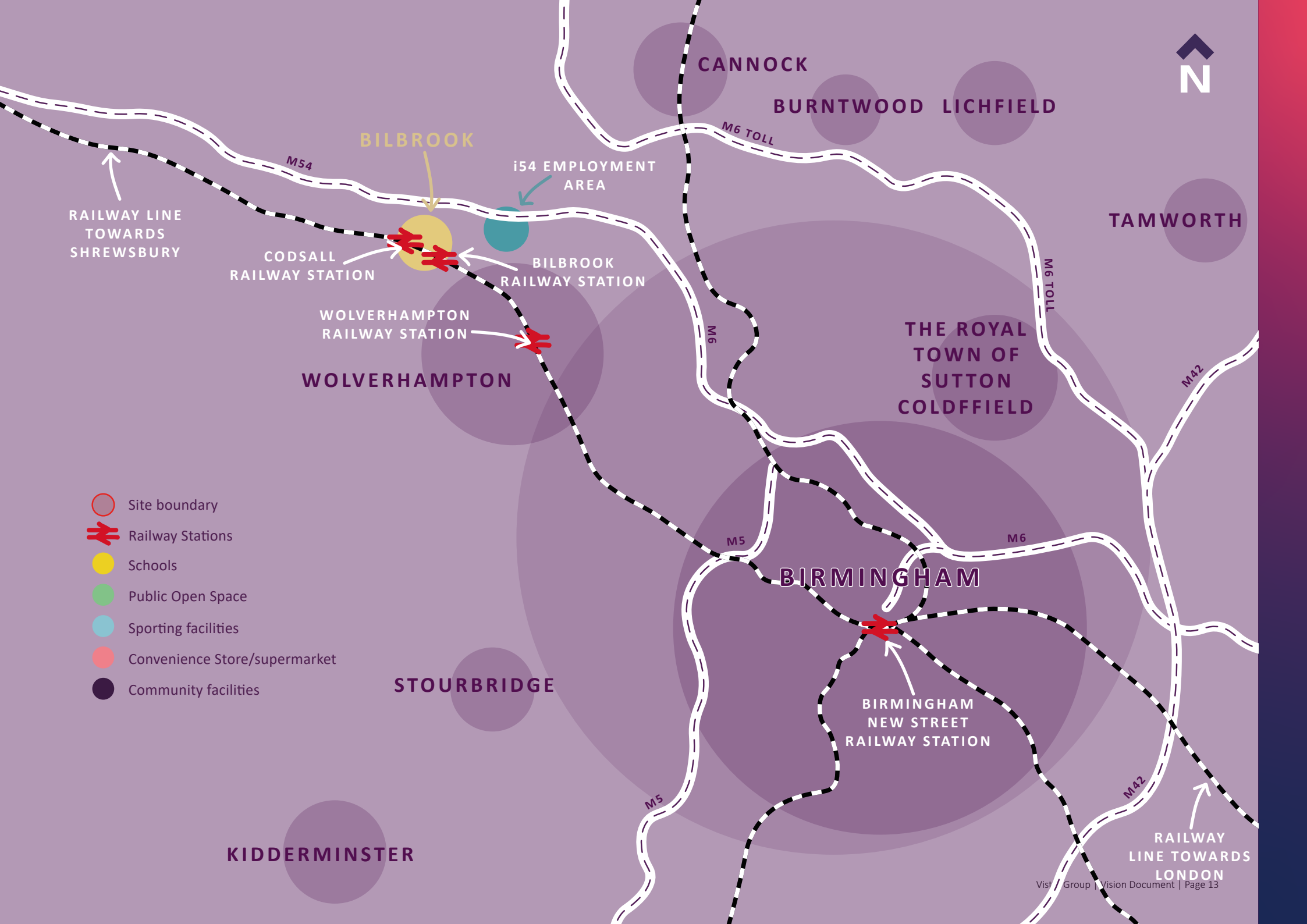
The aforementioned railway stations at Bilbrook and Codsall are typically served by hourly services 7 days a week in both directions between Birmingham New Street and Shrewsbury via Wolverhampton, with some extra trains at peak times on weekdays. Bilbrook railway station is located approximately 1.5km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

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



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





CANNOCK
BURNTWOOD LICHFIELD

TAMWORTH

BILBROOK

i54 EMPLOYMENT AREA

RAILWAY LINE TOWARDS SHREWSBURY

CODSALL RAILWAY STATION

BILBROOK RAILWAY STATION

WOLVERHAMPTON RAILWAY STATION

WOLVERHAMPTON

THE ROYAL TOWN OF SUTTON COLDFIELD

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

STOURBRIDGE

BIRMINGHAM

BIRMINGHAM NEW STREET RAILWAY STATION

KIDDERMINSTER

RAILWAY LINE TOWARDS LONDON

5.2 THE SITE

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

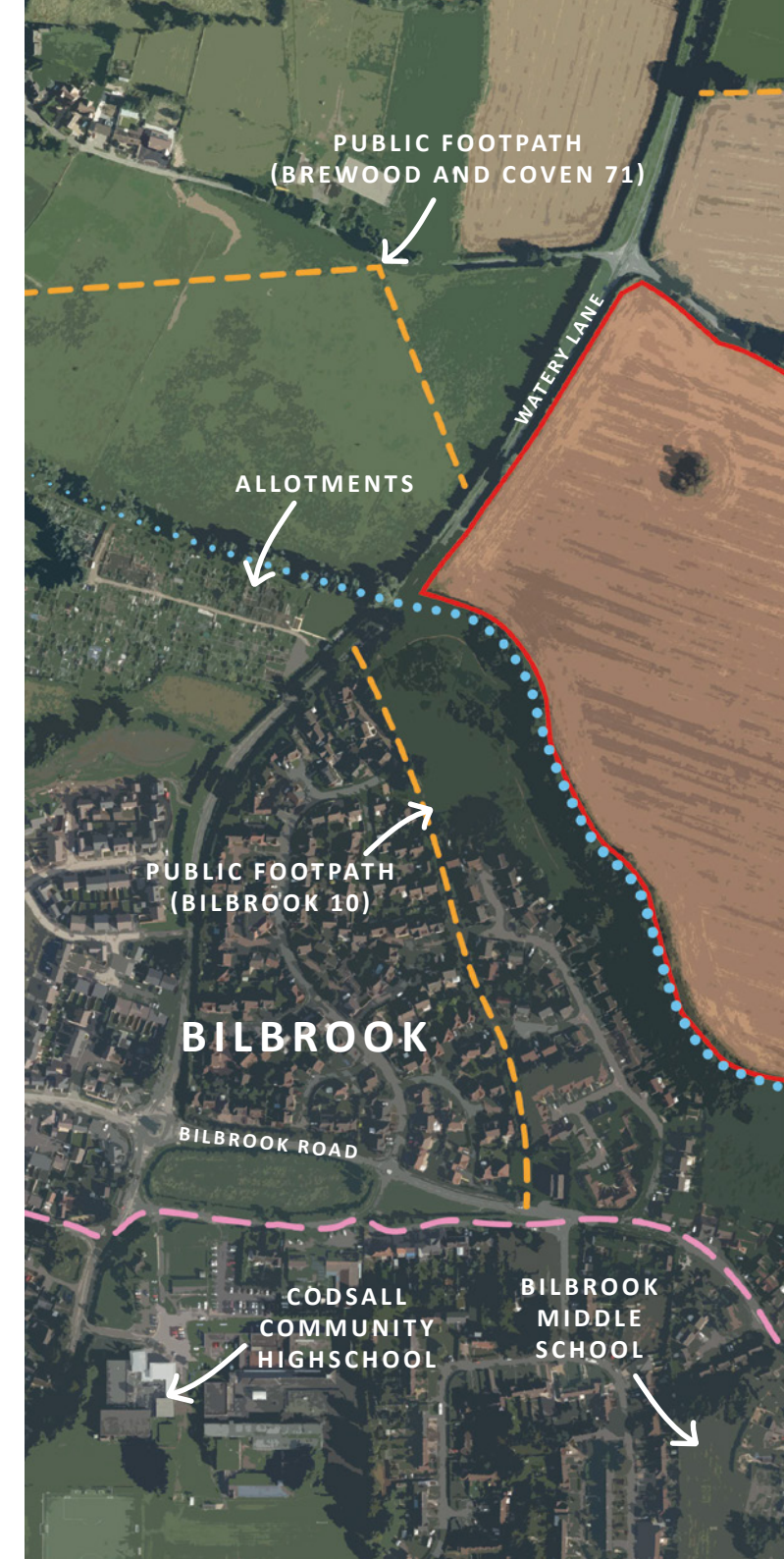
The Site's eastern boundary is partially delineated by a hedgerow and some hedgerow trees following the bank of the Shropshire Union Canal, with the rest of the boundary open along the bank of the canal.

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

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

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

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





PUBLIC FOOTPATH
(BREWOOD AND COVEN 68)

PENDEFORD HALL LANE



PUBLIC FOOTPATH
(BREWOOD AND
COVEN 45)

THE SITE

SHROPSHIRE
UNION CANAL



POND

PUBLIC FOOTPATH
(BILBROOK 2)

MOAT BROOK

WWTW




































RECREATION
GROUND

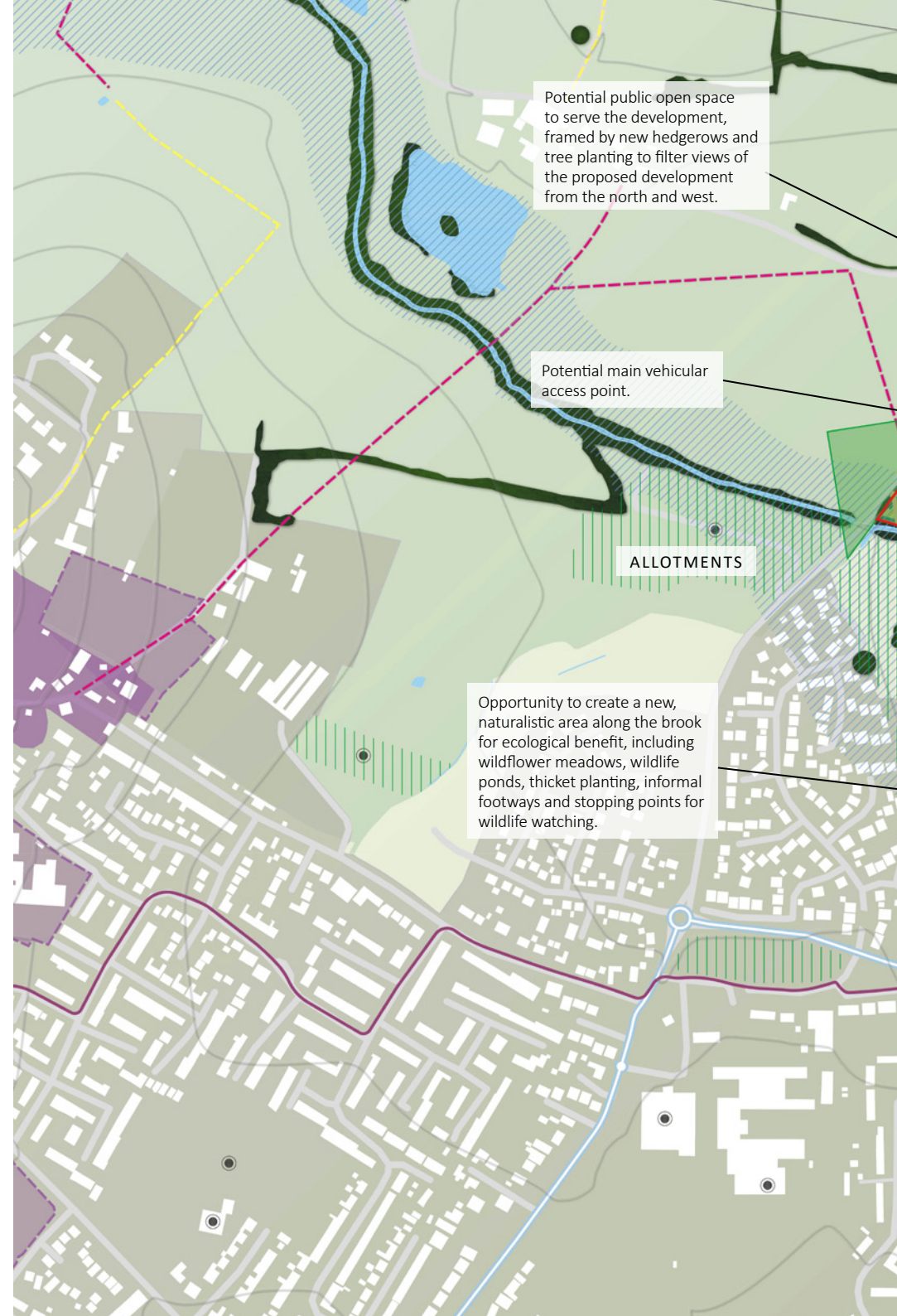
ALLOTMENTS

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.

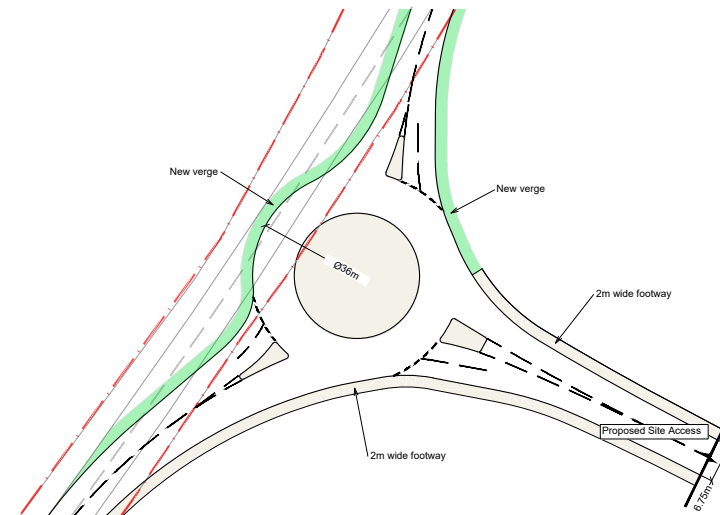
The new open spaces will help to retain and enhance the Site's existing landscape features, maintain habitat connectivity and enhance the Site's overall biodiversity value.

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

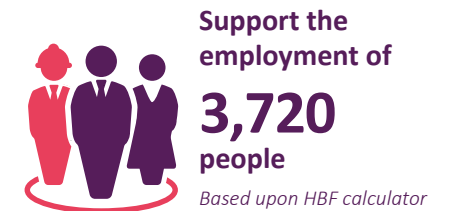
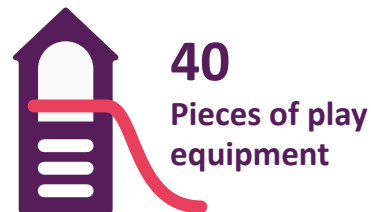
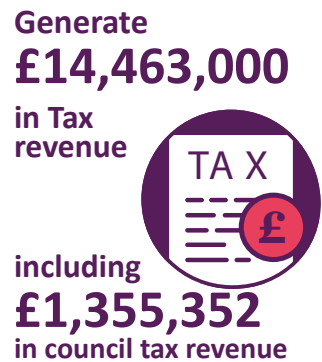
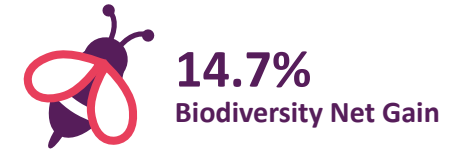
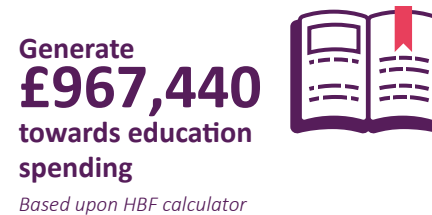
7.7 DRAINAGE

- 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.

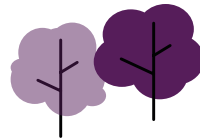
Sustainable links
and easy access
to adjacent major
employment
areas



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

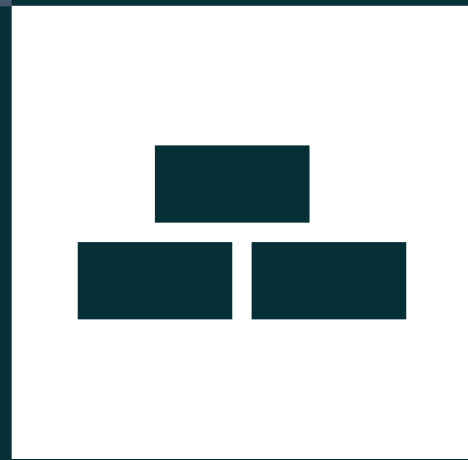
The emphasis of planning policy is on achieving sustainable development which has a social, economic and environmental function. The ability to achieve this is in large part down to location and good design.

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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