

# South Staffordshire Local Plan review

Examination in Public

## Hearing Statement for Matter 6 – Green Belt

On behalf of St Philips (Bratch Common, Wombourne)

Representor Ref: AGT24-030-07-02

Date: April 2025 | Pegasus Ref: P20-1302

Author: SB

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## Document Management.

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## Introduction

Pegasus Group is instructed by St Philips to respond to the South Staffordshire District Council Local Plan Examination: Matters, Issues and Questions Identified by the Inspectors, which has been produced by the Inspectors appointed to hold an independent examination of the South Staffordshire Local Plan ('the Plan').

This Statement relates to Matter 6 – Green Belt.

St Philips have a specific interests in land at Bratch Common Road, Wombourne, which has capacity to deliver up to 250 dwellings ('the Site'). A Site Location Plan is at **Appendix 1**.

St Philips has previously submitted details of the Site alongside detailed representations to all previous stages of the Local Plan process including the Issues and Options and the Spatial Housing Strategy and Infrastructure Delivery consultation in October 2019; the Regulation 18 Preferred Options consultation in December 2021; the Regulation 19 Submission Plan consultation in 2022; and the Regulation 19 Submission Plan consultation in 2024.

The Site extends to approximately 28 hectares and is located to the northwest of Wombourne but immediately adjacent to the settlement's north western boundary. The Site is bound by Bratch Common Road and Trysull Road on its southern and western boundaries, with the north and western edges adjacent to open countryside beyond.

## Matter 6: Green Belt

**Issue: Whether the Plan's approach to Green Belt is positively prepared, justified, effective and consistent with national policy. (Focus Policies DS1, DS2)**

**Q5. Are there exceptional circumstances to alter the Green Belt in the district in principle? If so, what are they? If not, how could housing and employment requirements be met in other ways?**

**Q6. Are there exceptional circumstances to justify the release of Green Belt land for development in Tier 2, 3 or 4 settlements?**

**Q7. Do the Plan's strategic policies set out the scale and need for the release of land from the Green Belt as required in the National Planning Policy Framework?**

As set out in the Paragraph 145 of the NPPF, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The Green Belt Review undertaken by the Council to inform the Local Plan is therefore welcomed, but it is considered that the exceptional circumstances detailed below would justify the release of additional land from the Green Belt to meet current and future development needs within South Staffordshire.

As the Council rightly note, the 2023 NPPF, against which this Plan is being examined states (para 145) that there is "no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated." The review of Green Belt that has informed the Local Plan is therefore welcomed in that sense. But the approach taken by the Council means that when reviewing this Plan, which will be immediate and likely before the end of 2025, they will be required to undertake a further Green Belt review in order to meet the requirements of their significantly increased housing requirements due to the new standard method for calculating local housing need set out in the December 2024, NPPF. This plan therefore, fails part of the tests of the 2023 NPPF against which it is being assessed, and the Green Belt boundaries proposed in the emerging Plan will not "endure beyond the plan period."

In terms of the exceptional circumstances which justify the release of land from the Green Belt, it is noted that in accordance with the Duty to Cooperate, which still remains, the Council must do its utmost to assist in meeting unmet needs across the housing market area, particularly given SSDCs proximity to adjoining West Midlands conurbations. The 2018 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Strategic Growth Study presented a strategic review of the Green Belt across the 'joint authorities' area. This review was undertaken in the light of the shortfall in housing need identified across the area. It was acknowledged that as a significant proportion of land within the Housing Market Area is covered by Green Belt, 'exceptional circumstances' through Local Plan reviews would be required to alter the Green Belt boundaries.

Despite proposing a contribution of 4,000 homes towards the unmet housing need of the GBBCHMA as part of the Reg 19 2022 Publication Plan, the 2024 Publication Plan now infersthat the Growth Study, on which the 4,000 contribution was based is out of date and requires further review, instead proposing a token contribution of 640 homes towards the unmet HMA need across the Plan period. However, it is evident Doc SST/ED11 submitted to the Examination and dated 29 November 2024, that there remains a significant unmet need across the HMA..

Doc SST/ED11, which is an 'Officer Agreed Version Statement of Common Ground Regarding Housing Shortfall' (SoCG) identifies that the shortfalls across all HMA authorities (Birmingham, Bromsgrove, Cannock Chase, Dudley, Lichfield, North Warwickshire, Redditch, Sandwell, Shropshire, Solihull, South Staffordshire, South Warwickshire, Tamworth, Telford & Wrekin, Walsall, Wolverhampton and Wyre



Forest) for the period 2023–2042 totals 76,427 dwellings. It also recognises that the figures it identifies could change as local plans progress.

Contributions toward unmet need are also set out in the SoCG where proposed. The SoCG is also referred to as a ‘statement of common ground’, which seeks to set out an agreed approach between the contributing authorities (Shropshire, Cannock Chase, South Staffordshire and Telford & Wrekin) and the receiving authorities (Black Country authorities and Birmingham) on how the contributions will be apportioned amongst relevant authorities, where the apportionment is based on net migration flows between the exporting local authority and each of the receiving authorities.

Whilst that apportionment is not considered in detail in the SocG,, the agreement itself is already out of date. Since its publication:

- 1) The Inspectors for the Shropshire Local Plan have recommended its withdrawal, and the Council have confirmed (see letter at Appendix 2) that they are recommending withdrawal of the Plan to Full Council. This means that the proposed contribution will not be coming forward from that draft Plan
- 2) The NPPF published in December 2024 introduced a new standard method for calculating local housing need. Whilst this has resulted in a significant reduction in need for Birmingham, plus reductions for Sandwell and Wolverhampton (very minor) all other authorities in the GBBCHMA area will have increased housing requirements. Unmet need is therefore likely to increase across the area, and the Duty to Co-Operate (and its replacement, once enacted following the Levelling Up and Regeneration Act 2024, will remain important.
- 3) Amended Local Plan legislation is also proposed to be enacted (through the LURA) in 2025. This will result in amended requirements for Plan-making where a large number of authorities, including South Staffordshire will be in immediate Plan review as their housing targets in current /emerging Local Plans are less than 80% of the new standard method requirements.

Notwithstanding the shortcomings of the November 2024 GBBCHMA SoCG it is evident that the ‘significant housing shortfall across the HMA’ that is acknowledged is only likely to increase.

The Spatial Housing Strategy Topic Paper (2024) (Doc EB14) continues to recognise the relationship between the District and adjoining GBBCHMA authorities and the opportunity to deliver unmet housing needs along the north/north-western edge of the Black Country to minimise the extent to which households from these areas are displaced from existing communities, jobs and education. The Topic Paper at Paragraph 4.10 concluded that *‘if unmet housing needs were located in close proximity to Wolverhampton and Walsall (i.e. along the north-western and northern edges of the Black Country) then this may minimise the extent to which households from these two areas are displaced from their existing communities, jobs and education’.*

The Green Belt Exceptional Circumstances Topic Paper 2024 (Doc EB16) (paragraphs 4.5 and 4.6) of the Local Plan evidence base continues to acknowledge the exceptional circumstances for the release of Green Belt land, providing the *‘exceptional circumstances case for releasing Green Belt at the districts most sustainable settlements with the best sustainable transport links to these authorities in the conurbation that are the source of the unmet needs.’* However, in terms of delivering housing for the District and the GBBCHMA this continues to focus on the delivery of housing on non-Green Belt options. Paragraph 7.2 of the Topic Paper sets out that only 0.16% of the District’s Green Belt is proposed for release despite SSDC acknowledging the significant unmet need of the wider GBBCHMA and these

authorities being unable to accommodate any of SSDCs housing requirement given they are also constrained by Green Belt or urban areas with unmet needs.

It is unclear however why SSDC require the assistance of other authorities when there are other opportunities for sustainable housing development through additional and 'Green Belt' release whilst still ensuring a significant quantum of high value Green Belt land is protected across the District. It is also evident, that since writing to the GBBCHMA authorities in 2021 (Appendix 1 of Green Belt Topic Paper 2024), that the unmet housing shortfall across the HMA's as evidenced through the various HMA authorities' Local Plan Reviews is now significantly greater and SSDC need to take a greater proportion of the unmet need through additional housing allocations.

As well as continuing to focus on the delivery of homes through the development of non-green belt land, SSDC have placed an emphasis on higher density development. The Green Belt Exceptional Circumstances Paper 2024 sets out that *'under the preferred spatial strategy, land is released at an average density of 35 dwellings per hectare, thereby ensuring Green Belt release is kept to a minimum'*. The Paper points to the density of 35dph recommended in the GBBCHMA Strategic Growth Study 2018 to make efficient use of land prior to the release of Green Belt land. As recognised by SSDC however, the study is dated, and predates mandatory government policy requirements, including increasingly stringent Building Regulations and 10% BNG. SSDC have also based the delivery of housing sites at a density of 35dph on historic development capacity in the District, including housing development sites which again did not have to deliver the requirements of more recent mandatory Government policy. This is discussed further later in this section.

SSDC clearly recognise the scale of the housing shortfall across the wider GBBCHMA however this is not reflected within the Plan itself. As demonstrated through the 2022 Publication Plan and under the provisions of the NPPF Paragraph 145, there are clear exceptional circumstances based on the housing evidence available at the time to suggest the release of additional Green Belt sites to meet both the District's and the wider HMA's housing need.

The SSDC's substantially reduced contribution of 640 homes towards the HMA unmet need is not reflective of the 'significant housing shortfall' clearly evident across the HMA authorities, and the Council are relying on there 'not being a requirement' to review Green Belt boundaries rather than considering the clearly identified exceptional circumstances in full. It is clear that the District, (along with others in the HMA) need to go further to address this housing supply shortfall. South Staffordshire in particular has the ability to make a significantly larger contribution to unmet needs in the HMA as it has a contiguous border with the West Midlands Conurbation. This could include a number of sites which could be highly sustainable, located on the edge of the conurbation.

The eastern edge of South Staffordshire's local authority boundary adjoins the local authority areas of Dudley and Wolverhampton with key transport infrastructure links running through South Staffordshire. The direct relationship between these adjoining urban authorities and the authority area of South Staffordshire provides further exceptional circumstances in which to release additional Green Belt land within the District to deliver the housing sites necessary to meet the clear unmet housing need across the wider HMA. Proximity to these urban conurbations also enables sites, particularly those located on or close to key transport infrastructure networks to benefit from sustainable transport including access to cross boundary bus and rail services consistent with the Plan's spatial strategy.

In addition to unmet needs from neighbouring authorities, the Council should be considering their future position and increased local housing need arising from the standard method introduced in the NPPF, and the potential to identify safeguarded land. This is referred to further in relation to the Inspectors' Q10 below.

## Q10. Should the Local Plan identify safeguarded land?

In addition to unmet needs from neighbouring authorities, the Council should be considering their future position and increased local housing need arising from the standard method introduced in the NPPF. The new standard method increases South Staffordshire local housing need from 223 dwellings per annum to 645 dwellings per annum. Significant additional land will need to be found, and this constitutes exceptional circumstances that whilst not a housing requirement of this Plan, are sufficient to consider the release of land for safeguarding to ensure that the altered Green Belt boundaries endure beyond the Plan period as required by NPPF para 145.

Paragraph 145 of the NPPF states that “*strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the Plan period.*” The South Staffordshire Plan is proposing some limited Green Belt amendments to provide proposed housing requirements. However, in order to address in particular, the issues arising from the shortfall in housing and employment land in the conurbations which in turn supports early review of the emerging Local Plan, it is essential that Green Belt boundaries are defined which will endure beyond the Plan period. The currently adopted Local Plan at Policy GB2 included safeguarded land for the longer term needs of the District. The Core Strategy was adopted in 2012 and so is now 12 years old. The NPPF highlights that Local Plans should be reviewed every 5 years so in effect the Core Strategy has endured two Local Plan cycles.

As a result, St Philips consider the 2024 Publication Plan should establish Green Belt boundaries which will not require amendment in the rest of the Local Plan cycle or indeed beyond, through the introduction of safeguarded land. The introduction of safeguarded land would give the Council greater flexibility to accommodate development requirements and to assist in meeting a growing unmet housing need across the GBBCGMA. Following the removal of Policy DS6 (Longer Term Growth Aspirations for a new settlement) as proposed within the Publication Plan 2022, the introduction of safeguarded land is particularly important to future growth of the District.

St Philips are of the opinion that their land interests at Bratch Common Road, Wombourne should be removed from the Green Belt (via the exceptional circumstances test for housing purposes) and a new Green Belt boundary redrawn. It is considered that the site is entirely logical for housing purposes being well related to Wombourne and as set out in detailed representations to the Regulation 18 and 19 consultations, it has been explained that the site is well contained by existing built form, highways infrastructure, and identifiable boundaries. A Concept Masterplan for development of the St Philips land interests is at Page 49 of **Appendix 3**.

St Philips have considered the implications of the release of the land from the Green Belt in terms of the Green Belt objectives identified at paragraph 143 of the Framework and also the approach which should be taken when identifying new boundaries as per paragraphs 147 and 148 of the Framework and provide the following comments:

### Green Belt Purposes

*To check the unrestricted sprawl of large built up areas* – By allocating the site through the Local Plan process, the release of the site would form part of a planned review of the Green Belt. The site benefits from having readily identifiable boundaries which ensure that, once released, formal boundaries will be identified and this will again help to ensure the site is contained. Wombourne is not identified as a large built up area and there will be no impact on this purpose of including land within the Green Belt.

*To prevent neighbouring towns merging into one another* – The site lies immediately adjoining the settlement of Wombourne and will be contained by a defensible boundary to the north west. It will not

impact on any other town, with the nearest settlement, Trysull to the north west not being impacted. Trysull is also note classed as a town and so there is no conflict with this objective of Green Belt purposes.

*To assist in safeguarding he countryside from encroachment* – As is explained at paragraphs 5.1 to 5.3 of the LPR, the Local Plan area does not benefit from large areas of non-Green Belt land adjoining the conurbation or existing settlements, nor does it have large areas of previously developed sites which could be reallocated for employment purposes. It is inevitable, therefore, that to accommodate both the housing and employment needs of both South Staffordshire and the overspill requirements of the conurbation that the open countryside will need to be released for development. This cannot, therefore, be a factor that counts against the release of the promoted site. Notwithstanding, development of the site would be seen in its context being located immediately adjacent to the existing settlement of Wombourne.

*To preserve the setting and special character of historic towns* – The site does not form part of the setting or special character of a historic town and, therefore, no conflict arises in respect of this purpose.

*To assist in urban regeneration, by encouraging the recycling of derelict and other urban land* – It is clearly acknowledged by the Council that the plan area does not have significant parcels of derelict and other urban land which could be used for development. Similarly, the adjoining Black Country conurbation is deficient in land supply to meet its housing and employment needs with the consequence that land outside of the urban area will have to be released for development. There is therefore, no reasonable prospect of the development needs of the plan area or the overspill needs of the Black Country conurbation being met on recycled derelict or other urban land and, therefore, the release of the land at Wombourne would not have an implication for urban regeneration. Therefore, an objective assessment of Green Belt purposes, as has been carried out above, demonstrates that there is no significant impact caused by the release of the site in terms of Green Belt objectives and it is clear that Green Belt land has to be released to meet development needs for both South Staffordshire and the Black Country conurbation.

Turning to the requirements of paragraphs 147 and 148 of the Framework, we note that the Green Belt boundary, once redrawn to accommodate the omission site, would help to meet requirements for sustainable development. The site is located such that it provides opportunities to use local facilities in Wombourne as well as the local public transport services. The site is in close proximity to the Dudley and Wolverhampton urban areas and as such there will be a high degree of connectivity and ability to higher level services in the settlement.

In line with paragraph 148e of the Framework, the Green Belt boundaries will not need to be altered at the end of the plan period and, in accordance with 148f, the Site can be provided with robust and defensible boundaries that will be readily recognisable and will be permanent. There would be no environmental or technical issues associated with the release of the site for development.

#### Green Belt and Grey Belt

In addition to the above, St Philips are also of the opinion that the Site could be considered grey belt.

In terms of its Green Belt status, the land falls within land Parcel S53 in the Green Belt Study that supports the Local Plan (Doc EB18). Within that it is within Parcel S53c and site specifically as ref.

S53Cs2, where the Study concludes that development would result in a moderate overall harm to the Green Belt. The Study considered that the locality contributed to the purposes of Green Belt as follows:

- Purpose (a) – to check the unrestricted sprawl of large built-up urban areas – MODERATE Contribution
- Purpose (b) – to prevent neighbouring towns merging into one another – WEAK/NO Contribution
- Purpose (c) – to assist in safeguarding the countryside from encroachment – STRONG Contribution
- Purpose (d) – to preserve the setting and special character of historic towns – WEAK/NO Contribution
- Purpose (e) – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land – STRONG Contribution (automatically applied to all land parcels in the Study).

The land at Bratch Common Road can be considered Grey Belt by definition, as it does not contribute strongly to any of purposes a, b or d of including land in the Green Belt. It would also meet the relevant tests set out at paras 155 and 156 of the 2024 NPPF for grey belt as follows:

- Development would utilise grey belt land and its development would not undermine the purposes of including land within the Green Belt as referred above.
- There is an unmet housing need within South Staffs, who cannot, at the time of writing, demonstrate a 5 year housing land supply, and who will be required to find additional land for development against the new standard method for calculation of local housing need.
- Wombourne is a sustainable location with a good range of services and facilities, and is a Tier 2 settlement within the Council's own defined spatial hierarchy, suitable for accommodating growth.
- Development of the Site could meet the relevant Golden Rules set out at NPPF para 156 including the provisions of up to 50% affordable housing. Improvements to infrastructure as required, and the provision of significant green spaces within the development that are publicly accessible.

St Philips' land interests at Bratch Common Road could constitute grey belt land that could be suitable for development in accordance with the tests for grey belt defined in the NPPF (December 2024). This must be given further consideration as the Plan progresses

**Q11. Are there any amendments required to the wording of Policy DS1 for soundness?**

St Philips do not accept the Council's proposition that the Green Belt '*contributes towards rural character*'. Green Belt is a development restraint policy set out at Chapter 13 of the NPPF and is not a landscape or character policy. The NPPF outlines '*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*'. Therefore, the Council should amend the text within Policy DS1 and its supporting text to represent national policy.

Policy DS1 as currently drafted is unsound and does not meet with the provisions of the NPPF Paragraph 35. It has been demonstrated that there are clear exceptional circumstances for the release of Green Belt land to meet the unmet housing needs of the GBBCHMA. The delivery of 640 homes is not however considered to be a proportionate, or fully evidenced contribution towards meeting this need and the Green Belt boundaries will not endure beyond the Plan period, contrary to NPPF para 145.

There are additional Green Belt sites suitable and available for housing which are sustainably located and will contribute further to meeting this need as well as addressing other issues and challenges identified within the District including the additional land that will be required to meet a much higher local housing need under the standard methodology introduced by the NPPF 2024, for which the Council will need to begin preparing a new Plan likely before the current one is adopted. The Green Belt boundary should therefore be amended further to enable the release of additional Green Belt sites, such as that at Bratch Common Lane for development either now or through utilising the option to safeguard land.

The other issue that needs to be taken into account in examining the Plan under the December 2023 NPPF, is the difference in Green Belt policy which will apply for decision-making purposes within South Staffordshire, as introduced in the December 2024 NPPF.

The South Staffordshire Green Belt Review work undertaken to support the Local Plan (Docs EB16 – EB18b) has not considered the concept of grey belt. But, as it will be important in decision making, it needs to be taken into account in the Local Plan Review.

The definition of grey belt refers to previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in Paragraph 143 of the NPPF. Thus, with 64 out of 82 parcels assessed not strongly contributing towards these purposes, St Philips would expect there to be a significant number of grey belt sites within South Staffordshire that can suitably accommodate development, and as this is a key consideration for development management even if not for the purposes of identifying land in this Plan, the Council's evidence base should be acknowledging this matter and providing clear policy references to Grey Belt.

As noted, Policy DS1 should include an acknowledgement that development in the Green Belt can be deemed appropriate if the criteria of Paragraph 155 are satisfied, and the 'Golden Rules' for residential development must also be referenced.

It is noted that Policy DS1, as drafted, reflects the national requirements of the December 2023 NPPF that was in force at the time the Plan was drafted and submitted. However, the Plan should be mindful of the changes that the 2024 NPPF introduced, particularly in how it will relate to future development management matters, planning applications and green and grey belt matters. These are national planning policies that impact on Development Management and as such will impact on how development in South Staffordshire will be delivered. To not include any such recognition of these changes would mean that upon adoption Policy DS1 would be out of date as it would not accord with national policy.



To be effective, Policy DS1 should be amended and updated to reflect national policy matters with regard to the wording and considerations of green and grey belt in the 2024 NPPF.



# Appendix 1

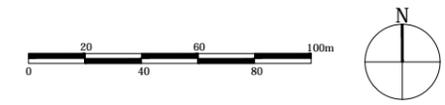
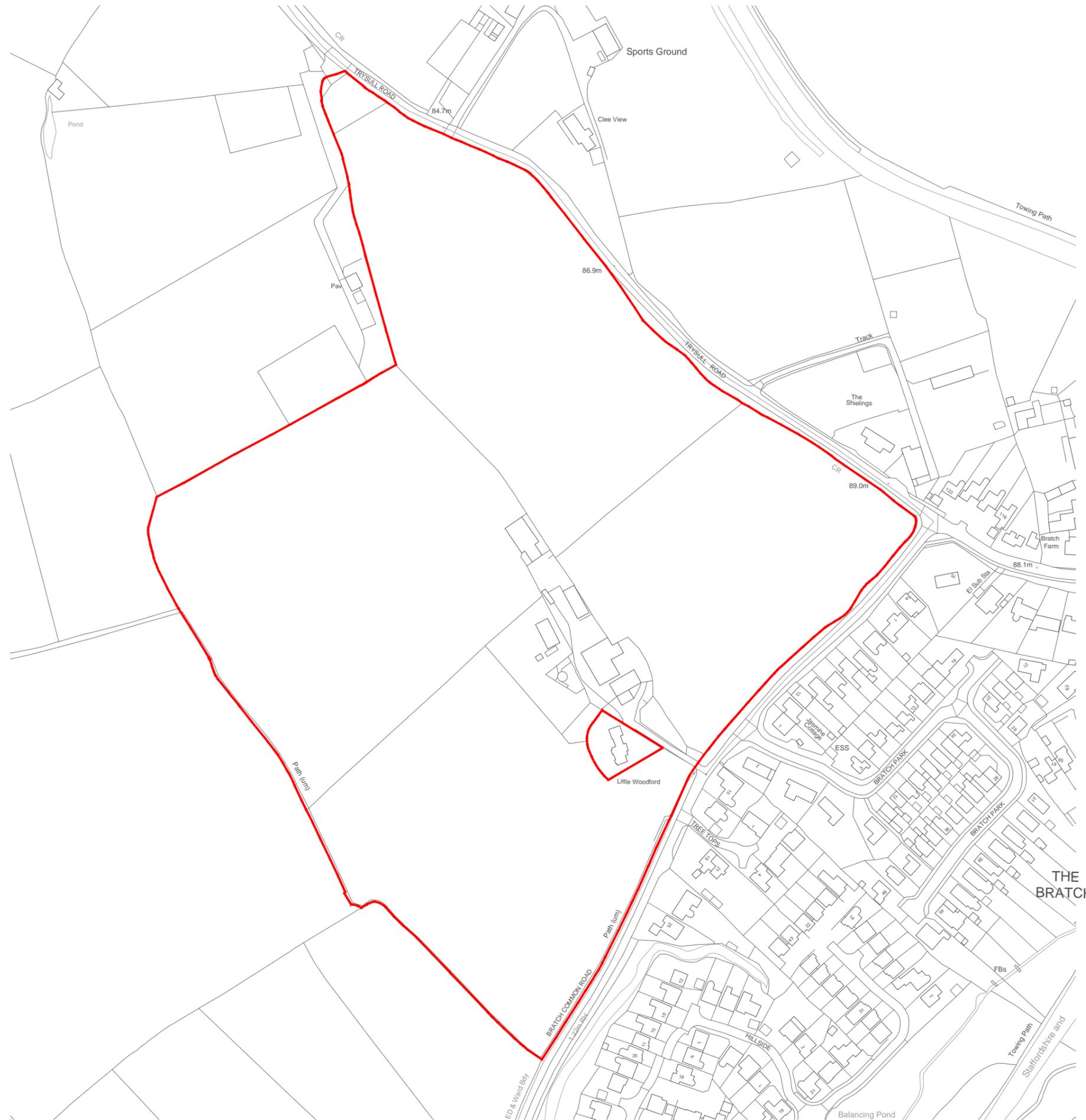
Site Location Plan

The scaling of this drawing cannot be assured

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

### LEGEND

 Site Boundary  
 12.71 Ha



Project  
**Bratch Common Road  
Wombourne**

Drawing Title  
**Site Boundary Plan**

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



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## Appendix 2

Shropshire Letter to Local Plan Inspectors

**Inspectors:**

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Elaine Worthington MTP MUED MRTPI IHBC  
Nick Palmer BA (Hons) BPI MRTPI

**Programme Officer:**

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Shropshire Council  
Guildhall  
Frankwell Quay  
Shrewsbury  
Shropshire, SY3 8HB

Date: 13<sup>th</sup> March 2025

**Shropshire Council Response to Inspectors Correspondence ID48**

Dear Inspectors,

Thank you for your letter of 17<sup>th</sup> February, which the Council received on 4<sup>th</sup> March 2025, setting out your response to the Council's letter GC56.

Clearly, the Council are hugely disappointed by your conclusions, the outcome of which provides no route to the adoption of the draft Local Plan. The choice now facing the Council is whether to agree to withdraw the Plan further to your recommendation, or to request you prepare a final report, of which you have already set out what your conclusions would be.

As the only choices open to the Council result in the same conclusion, the Council therefore recognises ID48 as a decision of the Planning Inspectorate that the draft Local Plan cannot be adopted due to the soundness concerns you have already set out in full in ID47 and within previous correspondence.

Set against the changing picture nationally with regard to Plan making, and in particular the new housing need figures derived from the Government's revised standard methodology, it had already become necessary for the Council to begin work on a new Local Plan later in 2025 regardless of the progress with the examination. However, having responded positively to the majority of your concerns, it remains extremely frustrating that we are now not being allowed an opportunity to undertake the work programme we set out in GC56.

Regarding the rationale for your position set out in ID48, having specifically invited the Council to prepare a project plan (paragraph 67 of ID47), it is now surprising you consider the work required to fulfil this would exceed the definition of 'limited' and could not be carried out in the defined six months. The Council are unaware of any material change in circumstance since the publication of ID47 regarding either your soundness concerns, or the



Government's advice to the Planning Inspectorate regarding the application of pragmatism in these circumstances. Put simply, it is unclear why this position was not reached in ID47, which would have saved the Council both time and expense.

For the avoidance of doubt, the Council continues to consider that the necessary work to address your soundness concerns, as set out in GC56, is capable of being undertaken within a six month period. It is also apparent there is flexibility regarding the application of the six month timetable as demonstrated by recent conclusions of other Local Plan Inspectors.

However, it is clear that despite this, you have concluded that undertaking necessary additional work in accordance with the proposed project plan is no longer an option open to the Council.

On this basis, officers feel that there is little choice but to recommend to elected members that the draft Shropshire Local Plan is withdrawn from the examination.

However, under our Constitution the decision to withdraw the Local Plan from examination requires full Council approval. Because our pre-election period commenced on Monday 10<sup>th</sup> March, ahead of elections on Thursday 1<sup>st</sup> May, the first opportunity for full Council to consider this recommendation and reach a decision is likely to be 17<sup>th</sup> July 2025. As a result, it is our intention to take a report to this meeting with a recommendation that our members provide approval to withdraw the Local Plan from examination.

Therefore, please accept this letter as the Council's intention to withdraw the Plan from examination, and on this basis we would ask that no further work be undertaken by you on the examination. We will write to you formally confirming the decision of Council in due course.

Your sincerely

Eddie West  
Planning Policy and Strategy Manager





## Appendix 3

Concept Masterplan (within Vision Document)

VISION DOCUMENT

BRATCH COMMON ROAD

# WOMBOURNE

DECEMBER '18



## ST PHILIPS

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Desktop Publishing and Graphic Design by Barton Willmore Graphic Communication

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

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Date 03.12.2018 Status Draft Rev D

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# VISION

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





# 1. INTRODUCTION

## 1.1. Document Scope

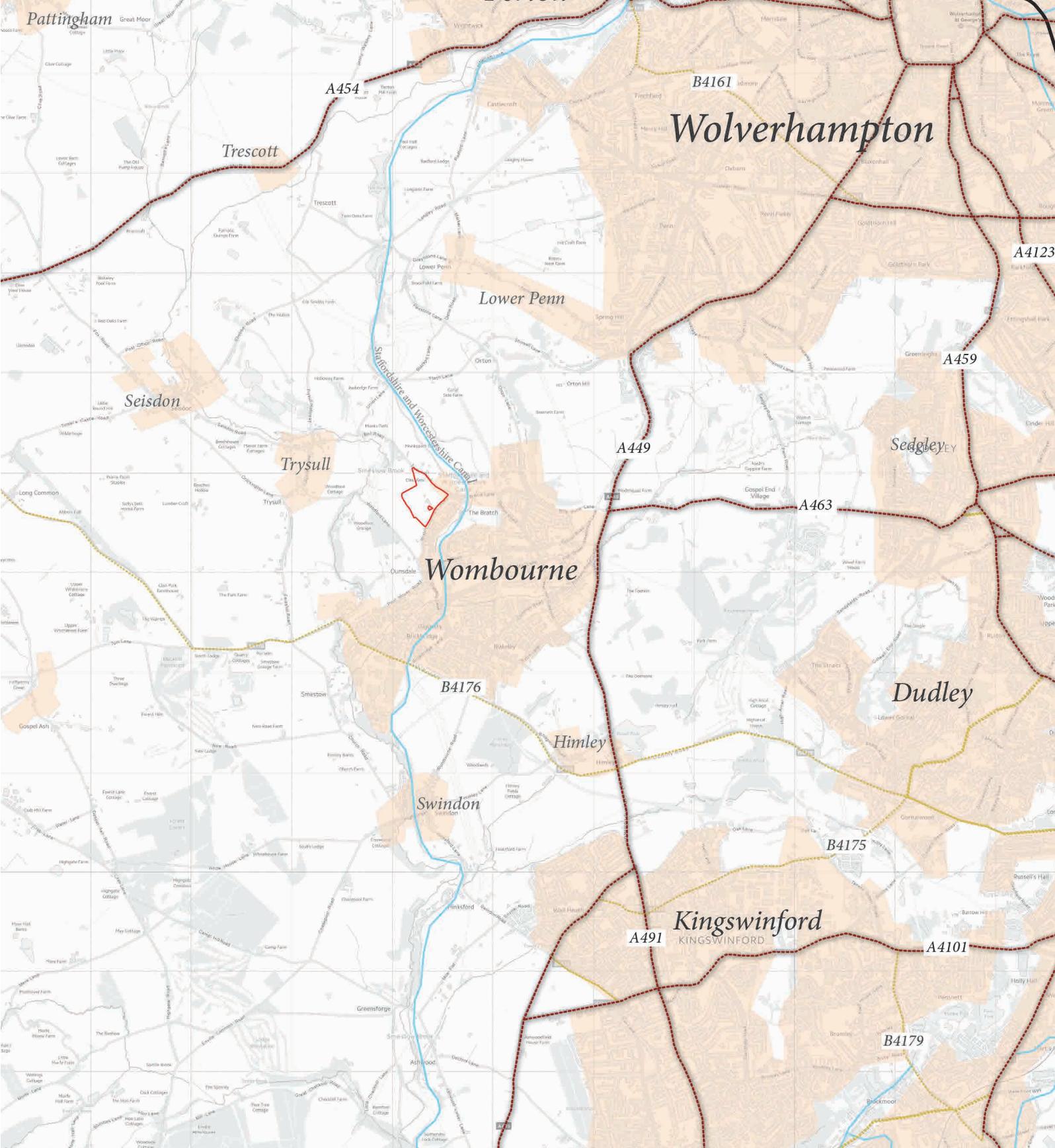
This Vision Document has been prepared on behalf of St Philips Ltd to support promotion of the site for residential development at Bratch Common Road, Wombourne through the South Staffordshire Local Plan review process.

The key aims and objectives of the document are:

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

## 1.2. Site Location

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



Pattingham

A454

B4161

Wolverhampton

Trescott

Lower Penn

A4123

A459

Seisdon

Trysull

A449

Sedgley

Wombourne

A463

Wombourne

Dudley

B4176

Himley

Swindon

B4175

Kingswinford

A491

A4101

B4179

### 1.3. Site Description

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

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

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



*Site Photo - Bratch Common Road*

Trysall Road

Bratch Lane

Staffordshire and  
Worcestershire Canal

Bratch Common Lane

Wombourne



#### 1.4. Planning Policy

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

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

##### *Local Plan Review*

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

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

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

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

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

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

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

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

### *Evidence Base*

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

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

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

### 1.5. Assessment Against The Five Purposes of The Green Belt

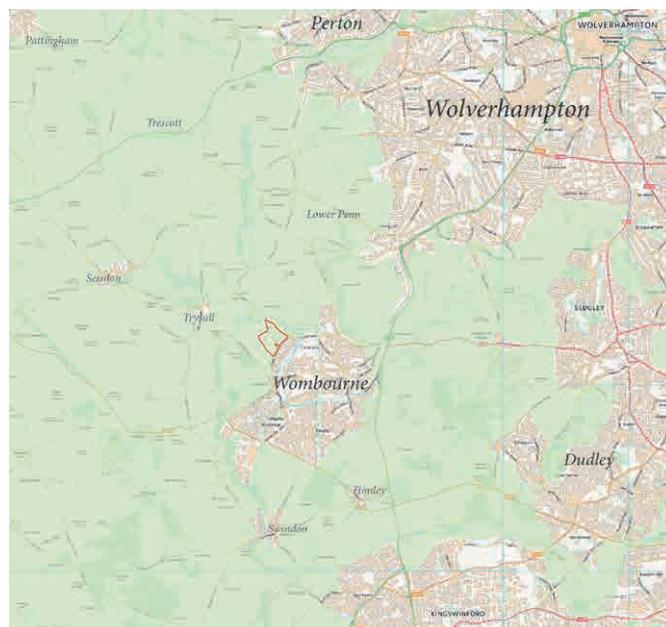
To date, the Council’s most recent evidence to inform the areas of Green Belt designation within the Borough is the South Staffordshire Partial Green Belt Review 2016. This considers the performance of Green Belt parcels around the defined settlements in the District, but stops short of assessing the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

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

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

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

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



*Local Green Belt Extent*

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

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

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

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

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

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

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

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## 2. LOCAL CONTEXT

### 2.1. Access, Movement & Facilities

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

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

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



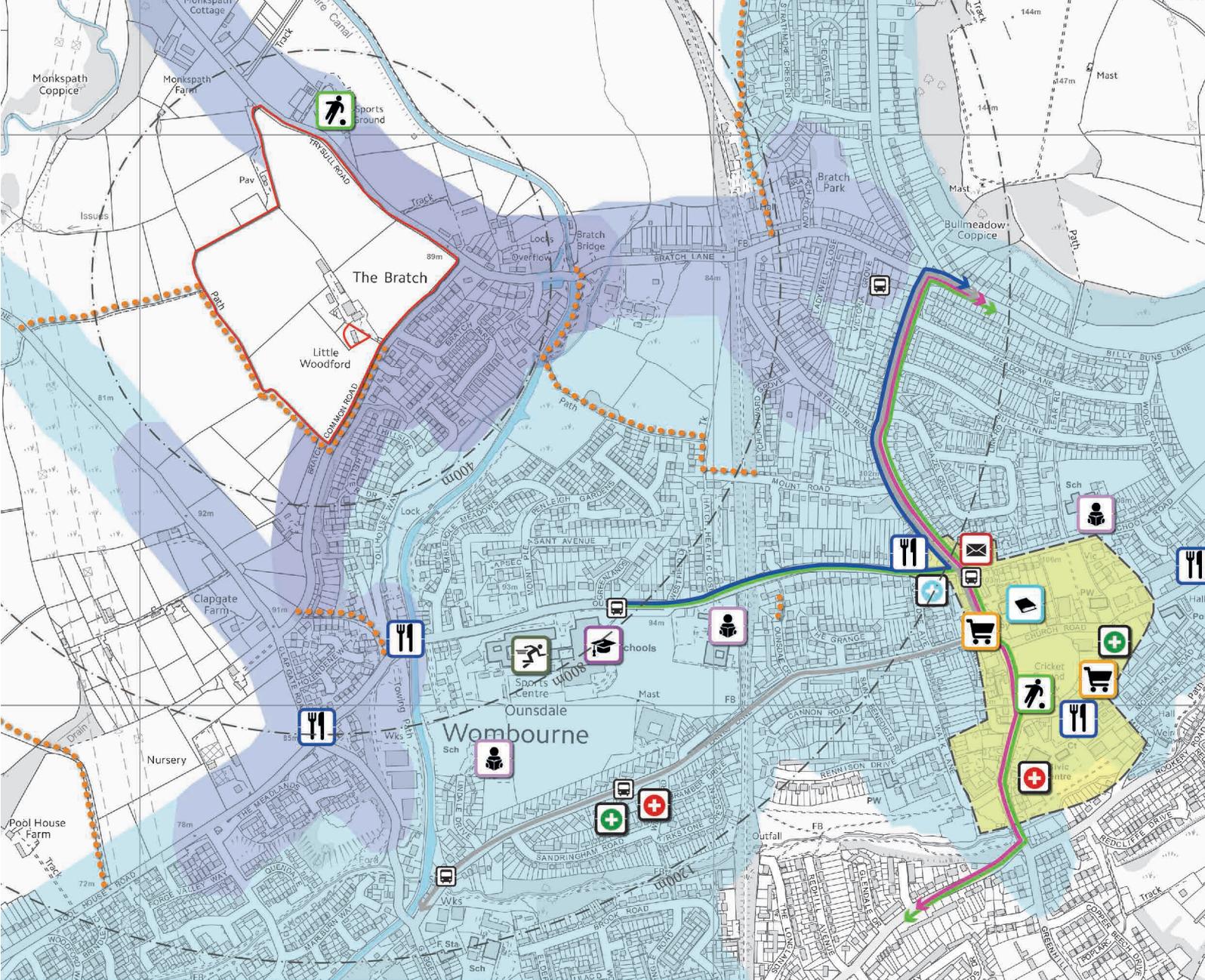
*Local bus service connecting to village centre.*



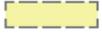
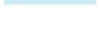
*Local Co-operative*



*View south over village green / cricket pitch.*



Local Movement & Facilities Plan

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

## 2.2. Landscape Character

### *National Landscape Character: NCA: 66 Mid Severn Sandstone Plateau*

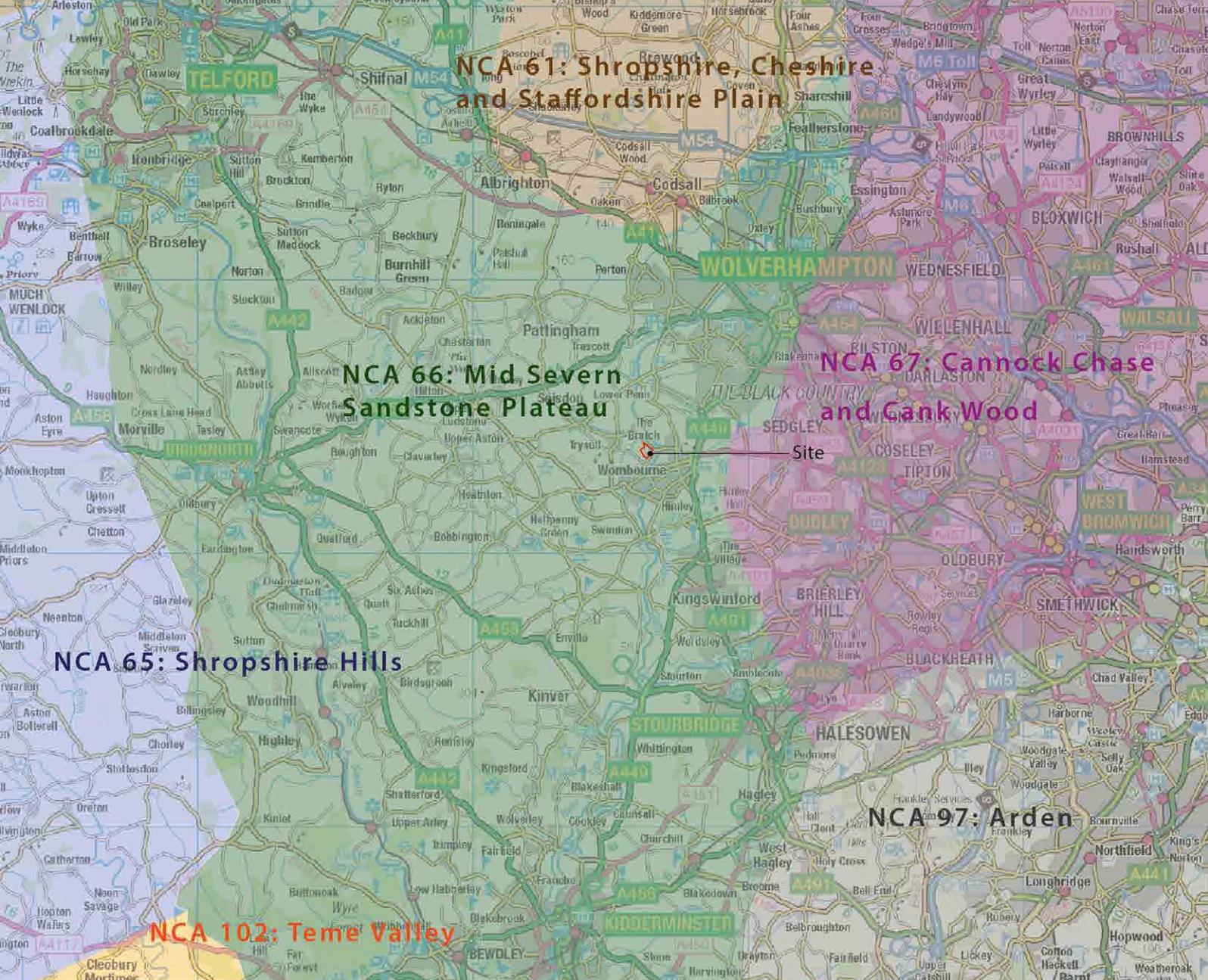
Landscape Character Assessment at a national level of study is recorded by Natural England (NE) within 159 National Character Areas (NCA). The Landscape and Visual Appraisal (LVA) contained within the Vision Document (VD) records a careful appraisal of the national level character study in relation to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

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

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

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





National Character Area Plan



Site Boundary

Natural England National Character Areas (NCA):



NCA 66: Mid Severn Sandstone Plateau



NCA 65: Shropshire Hills



NCA 102: Teme Valley



NCA 97: Arden



NCA 61: Shropshire, Cheshire and Staffordshire Plain



NCA 67: Cannock Chase and Cank Wood

### 2.3. Regional Landscape Character

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

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

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

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

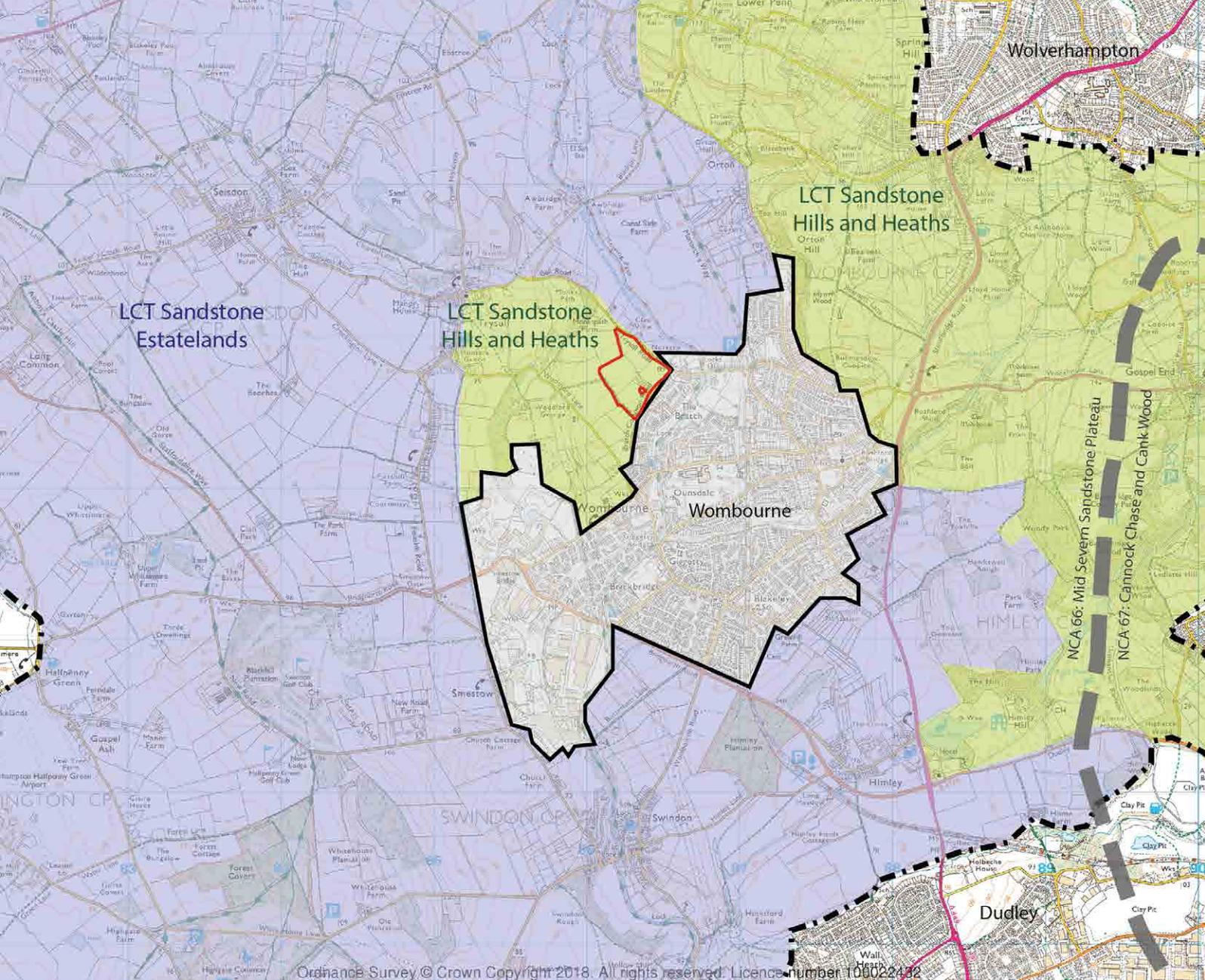
### 2.4. Local Landscape Character

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

#### *Historic Environment Character Assessment: South Staffordshire (2011)*

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

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



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### Local Landscape Character

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

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

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

#### *Landscape Sensitivity Study (2017 Update)*

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

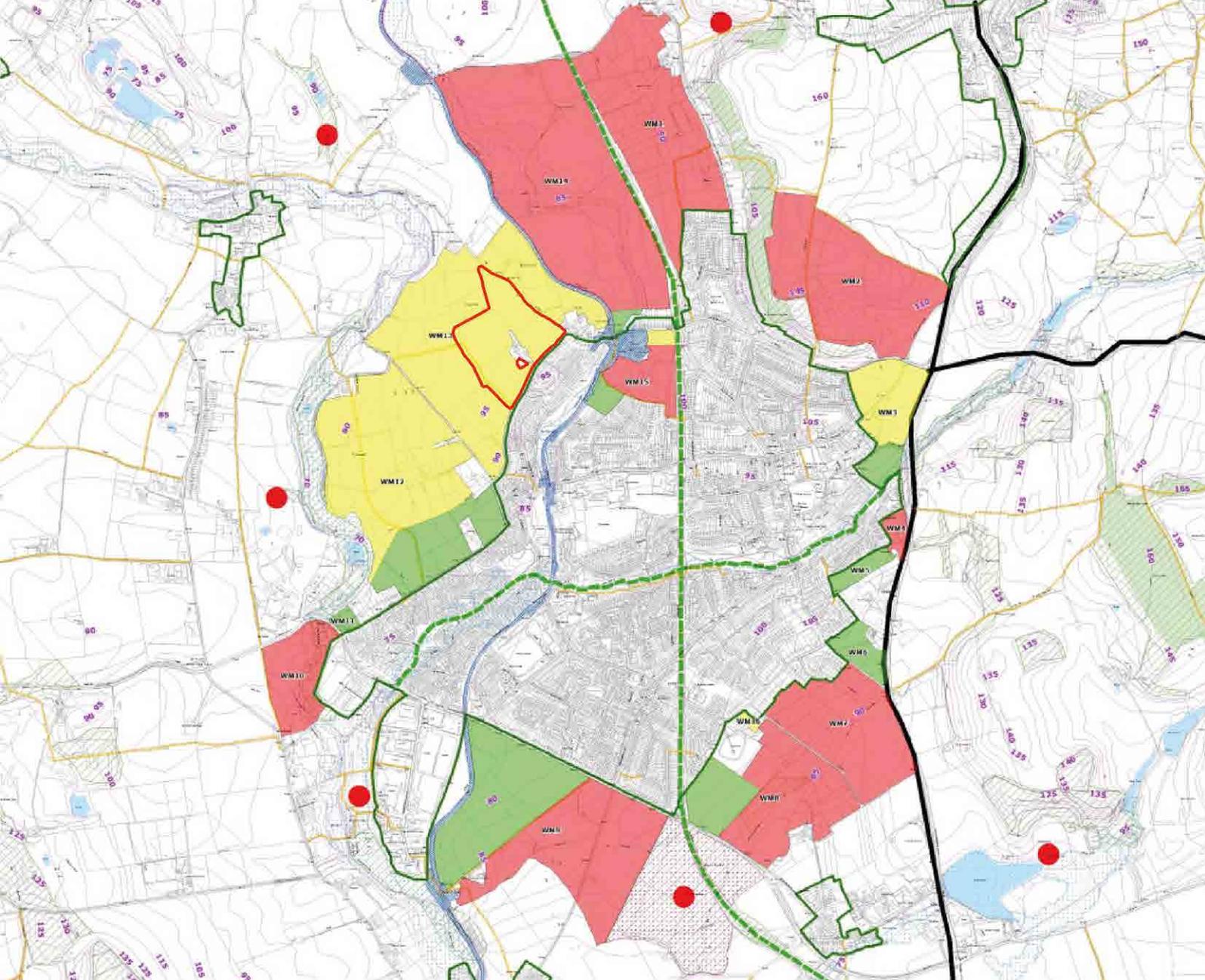
WM13 is a large LCP comprising medium to large fields with boundaries delineated by hedgerows. The land falls gently to the Smestow and forms the shallow valley side. The LCP is bordered on its south eastern and south western edges by quiet lanes. The north eastern part of the LCP is bisected by Trysull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

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

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

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

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



Landscape Sensitivity Plan

 Site Boundary

Landscape Sensitivity Rating:

 High

 Medium

 Low

## 2.5. Land Use and Settlement Pattern

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

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

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

## 2.6. Tree Cover

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

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

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

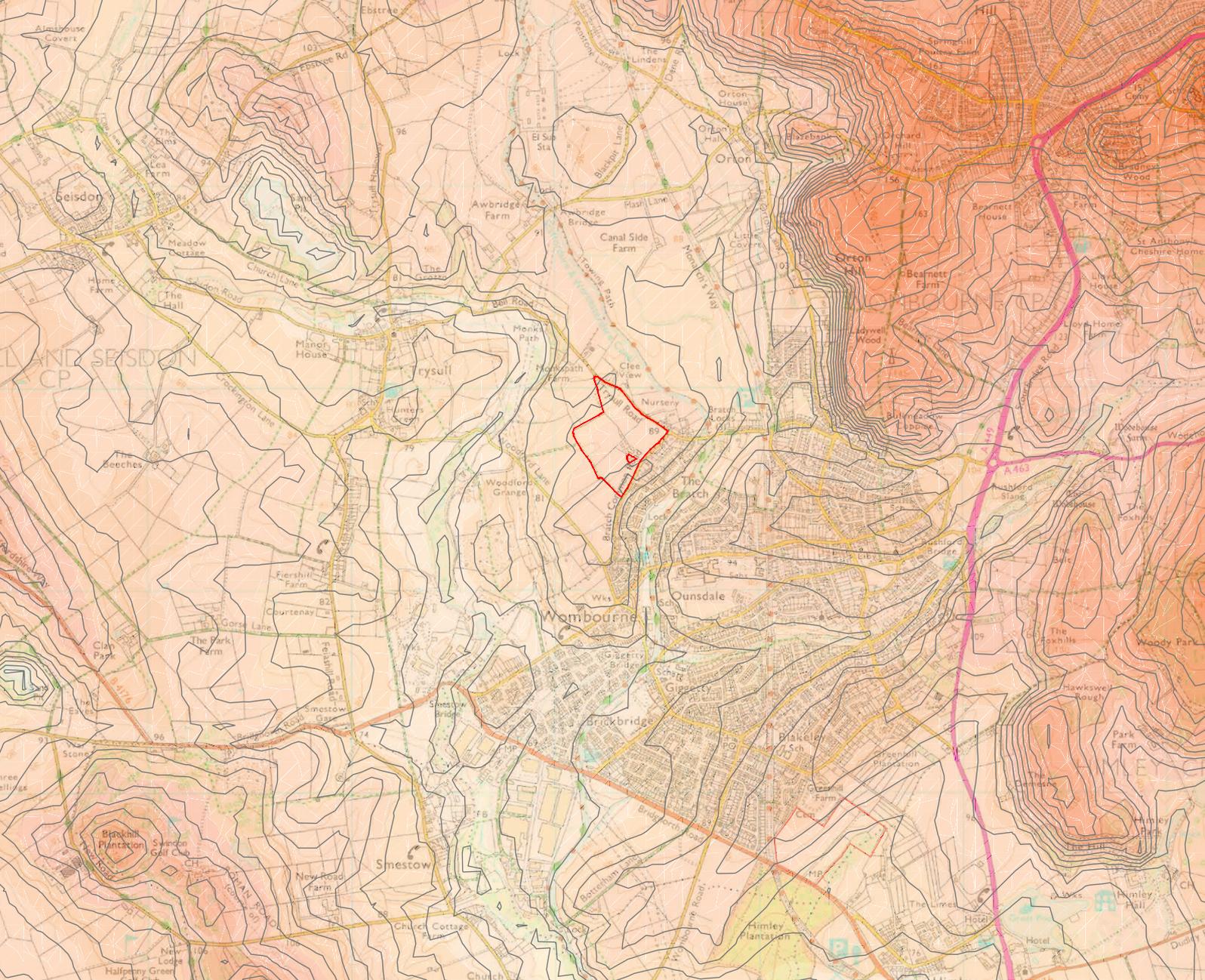
The HECA recommends the re-establishment of the historic hedgerows along their original alignments.

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

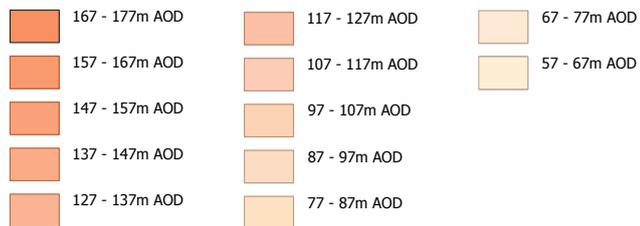
## 2.7. Landform

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

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



*Landform of the Setting*



## 2.8. Heritage & Archaeology

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

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

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

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

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

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

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

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

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

### *Opportunities*

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



*Bratch Locks*

## 3. SITE ASSESSMENT

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

### 3.1. Access & Highways

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

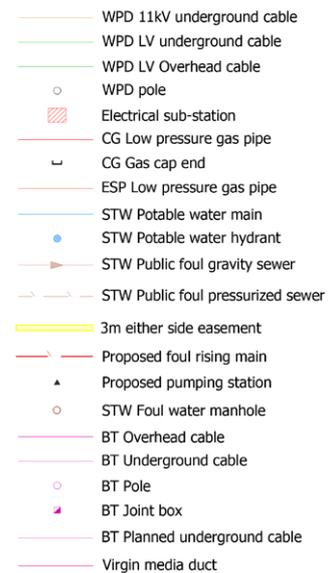
There is an opportunity to widen Bratch Common Road, which is currently of poor quality and of insufficient width in places, either within the development site frontage, or in conjunction with potential adjacent developments.

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

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



#### UTILITIES





### 3.2. Drainage & Flood Risk

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

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

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

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

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

### 3.3. Geo-Environmental

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

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

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

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

### 3.4. Arboriculture

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

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

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

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

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

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

### 3.5. Ecology

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

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

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

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

### 3.6. Utilities

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

#### *Electricity*

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

#### *Gas*

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

#### *Potable water*

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

#### *Telecoms*

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

### 3.7. Soils & ALC

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

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

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

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

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

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

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

### 3.8. Noise Assessment

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

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

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

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

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

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

### 3.9. Air Quality

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

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

The background levels of NO<sub>2</sub> and PM<sub>10</sub> are well below the background air pollutant concentration objectives according to the DEFRA Local Air Quality Management (LAQM) web pages.

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

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



### 3.10. Landscape Appraisal

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

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

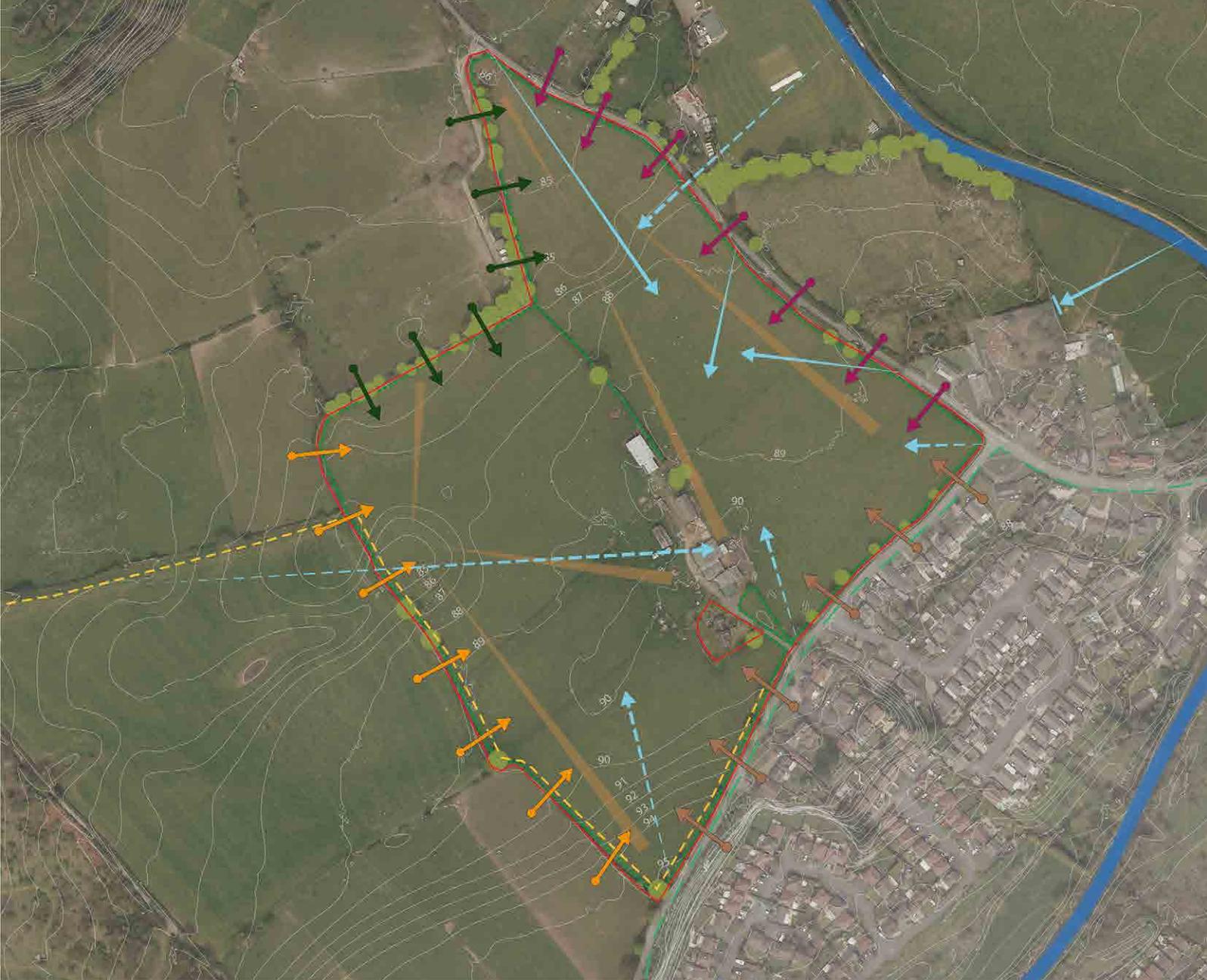
Within these defined boundaries, the site includes all built form present bar the south-western most property and its associated garden boundary demarcated by a hedgerow and a line of purple beech trees.

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

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

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

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



### Landscape Appraisal Plan

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

#### Baseline: Landform

-  Contours
-  Slope

#### Baseline: Vegetation on Site

-  Tree Cover and field trees
-  Hedgerow

#### Landscape Edge Characteristics

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

#### Local Visual Analysis

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

### 3.II. Views and Visual Amenity

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

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

Staffordshire and Worcestershire Canal



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



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



Site



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

Trysull

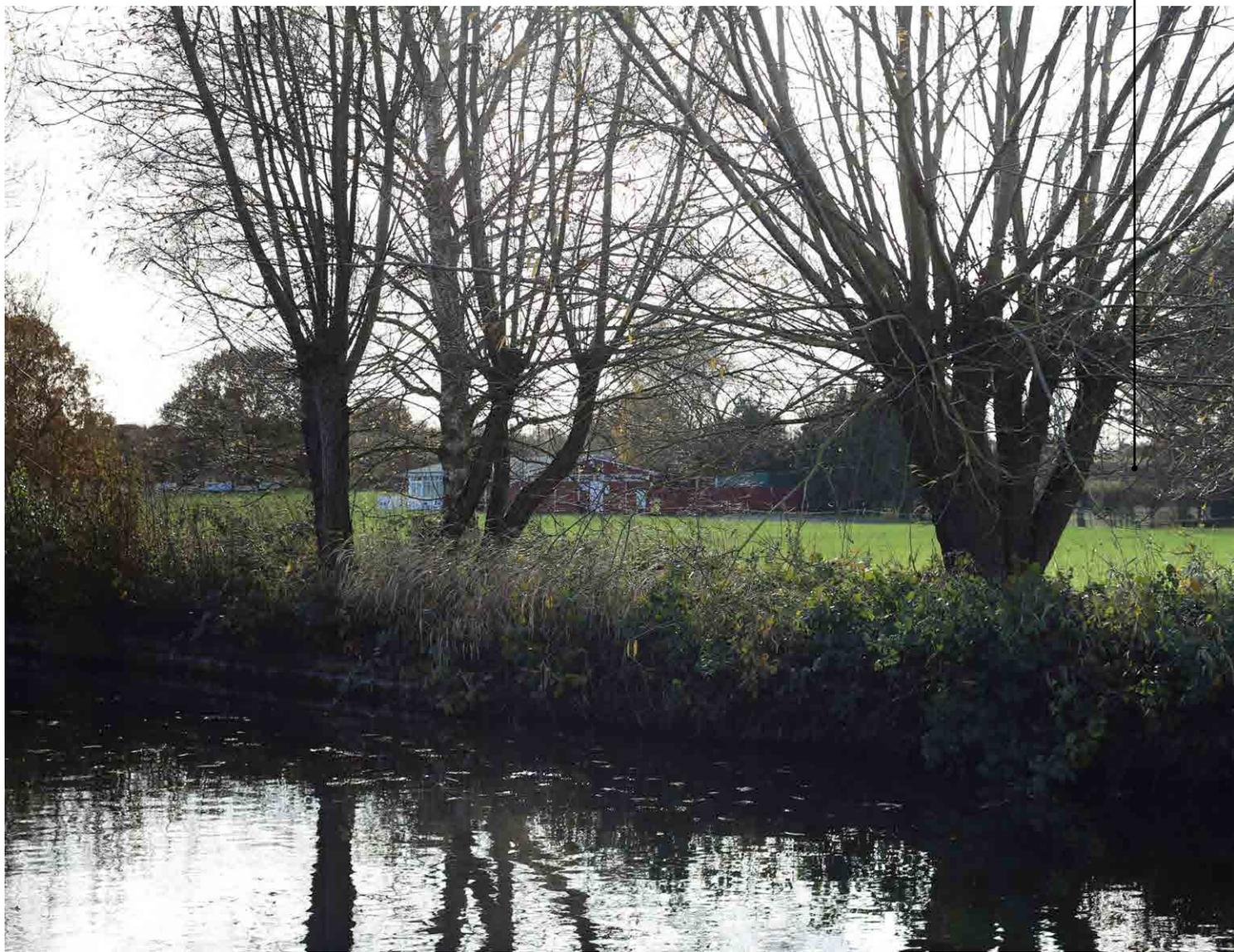


Site



Site

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



Whitehouse Plantation (135m AOD) 3km from site

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



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



Site



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



Site



## 4. DESIGN PRINCIPLES & CONCEPT

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

The scheme is shaped by the following design principles:

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





#### 4.1. Landscape Strategy

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

There are three key objectives for Landscape Strategy:

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

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

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

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

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

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



### Landscape Strategy Plan

-  Site Boundary
- Existing Components**
-  Settlement
-  Countryside
-  Roads

-  Public Rights of Way
-  Buildings
- Vegetation**
-  Tree Cover and Understorey
-  Field Hedgerows

- Local Visual Analysis**
-  Clear/open Viewline
-  Filtered/Partial Viewline

- Proposed Components**
-  Development Area
-  Public Green Space
-  Trees
-  Play space
-  Attenuation Basin
- Green and Blue Infrastructure**
-  Green Infrastructure links

## 5. IS THE SITE DELIVERABLE?

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

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

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

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

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



## 6. SUMMARY OF ASPIRATIONS

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

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

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



**BARTON  
WILLMORE**

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

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