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South Staffs Spatial Housing and IDP Consultation Response



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Dear Sir / Madam

Representations to the South Staffordshire Spatial Housing Strategy and IDP

Land at Lawnswood Road, Wordsley

On behalf of CWC Group, we have prepared the following submission in response to the Spatial Housing Strategy and IDP consultation, in respect of land at Lawnswood Road, Wordsley (see appendix A). We have set out the background to the site in the section below.

Site Context

Our client's land is bound by Lawnswood Road and Kiddiminster Road (A449). The site has a total gross area of approximately 56 hectares (138 acres). The site is split across 2 parcels. Parcel 1 is bound by the A449 to the west and surrounded by Lawnswood Road to the north and South in an irregular triangle. Parcel 2 is located to the south of parcel 1, with Lawnswood Road located to the north, a wooded area to the west and south and existing residential development to the east.

The site is not listed within the 2018 South Staffordshire Strategic Housing Land Availability Assessment. A call for sites form was submitted in November 2018 and is resubmitted with these representations for completeness. The site is listed in the Black Country Call for Sites (June 2019) as site 108. Appendix A shows the extent of the two sites (Parcel 1 & Parcel 2).

As is set out below, the following technical reports are available on request and have informed the representations submitted:

- Opportunities and Constraints Plan and Design Framework (Node)
- Landscape and Green Belt Appraisal (FPCR)
- Transport Access Feasibility Study (WSP)
- Flood Risk Assessment (WSP)

Design Framework

An illustrative masterplan (See appendix B) has been prepared to reflect the unique physical site characteristics and also relate sensitively to its existing built and landscape surroundings.

The development could provide up to 600 homes at 30dph or 700 homes at 35 dph. It is envisaged that this would provide a mix of market and affordable family homes, including 2, 3, 4 and 5 bedroom properties to foster the creation of a mixed community. A conservative estimate of the capacity for development is provided at this point, which could be significantly increased once informed by further detailed technical work.

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The development could create significant areas of new public open space, including the potential to create a new woodland link between Ridgehill Wood and Friars Gorse. Children's play could be provided within these areas to be readily accessible from all areas of the site.

Access to the southern plot could be taken from a single point along Lawnswood Road, with two points of access to the northern plot, allowing the creation of a new connection through the site. This connection could be vehicular or pedestrian/cycle only.

New woodland planting will strengthen the existing woodland, providing a continuous link from north to south. Beyond this woodland, a second cluster will provide a different character area which relates more closely to the adjacent residential development in terms of its scale, density and character. An area of open space could provide children's play and a drainage area.

Responses in respect of the Spatial Housing Strategy and IDP

Question 1) Do you agree that the evidence base used to inform Spatial Housing Options is robust and proportionate? If not, what else should we consider?

Green Belt Study

The site has been analysed in studies produced by LUC on behalf of South Staffordshire Council in July 2019. Both Green Belt and Landscape studies have been undertaken. Both produced conclusions based on overall parcels of land, and assessments were not undertaken at a site specific level.

In the "South Staffordshire Green Belt Study", the site formed part of an area of land described as Parcel S75B. The study concluded a "**very high**" harm rating, for removal of the parcel from the Green Belt. A more detailed analysis has been undertaken by FPCR and concluded that parcel 1, north of Lawnswood Road, would have a "**moderate**" harm rating for removal from the Green Belt. parcel 2, south of Lawnswood Road, would have a "**low/moderate**" harm rating for removal from Green Belt.

The LUC report sets out a range of potential measures to mitigate harm, depending on the circumstances. These measures include:

- Using landscaping to help integrate a new Green Belt boundary
- Enhancing access within the Green Belt.

It should therefore be considered that if a site specific approach to the value of Green Belt, along with consideration of potential enhancements that development of the parcels for residential development should be supported.

Rural Services and Facilities Audit

We appreciate that the audit focuses on rural areas. However we consider it remissive that the audit has not considered services and facilities provided in settlements adjacent to rural areas being considered for potential urban extension.

If development is located adjacent to the Black Country Conurbation, consideration should be given to the services and facilities available in this locality. Within the adopted Black Country Core Strategy, Stourbridge is categorised as a Town Centre, whereas Wall Heath and Kingswinford are highlighted as "District and Local Centres". This demonstrates the level of local facilities that are available in the adjacent to the site, in the Black Country area.

Environmental Constraints

We acknowledge that the Council has considered high level constraints which may affect the level of growth in broad locations. During the next stage of the Local Plan process where they will allocate potential development sites, we request that the Council utilise any additional technical evidence that has been submitted to them by landowners / promoters / developers. This will ensure that the Council allocate sites which they can demonstrate are suitable and deliverable. We set out below a summary of technical work that has been undertaken in respect of the site:

Flood Risk Assessment

WSP have produced a Flood Risk Assessment of the site. The report demonstrates that the proposed development can be undertaken in a sustainable manner without increasing the flood risk at the site or any third-party land, in line with NPPF requirements.

The proposed drainage strategy aims to mimic the behaviour of the site pre-development (greenfield). The maximum peak rate of discharge from the site will be 38.4l/s and the total storage volume required is 12,860m³ for the critical 1 in 100 year event plus climate change.

Access and Feasibility Report

An Access and Feasibility Report has been produced by WSP which sets out the existing situation and identifies the main opportunities and constraints of transport access to the 2 development parcels.

Following a review of the main constraints presented in this document, three potentially feasible access points have been identified. Two access junctions to parcel 1: from Lawnswood (north) and Lawnswood (south). Access to parcel 2 is potentially feasible from Lawnswood (south) via a simple priority junction, however this would require a reduction to the speed limit on Lawnswood to achieve required visibility splays. The report also identifies a requirement for junction improvements to the Lawnswood / A449 junctions, Lawnswood / Lawnswood Road and wider connections to the highway network.

The Availability of Sites

We support the Council's consideration of sites included in their SHELAA. However, we consider that the SHELAA should be updated to include information that has been submitted to the Council since 2018. For example, the technical work that is referred to within these representations should be considered within the assessment of the site. This will allow the Council to have a greater understanding of the technical constraints and opportunities on different site. We also note that the site is not included in the 2018 edition of the SHELAA, we submit a SHELAA form for completeness.

We request that the Council amend the SHELAA to take account for such up to date evidence and should use this information to inform their site selection process.

Infrastructure Delivery Plan

We note that reference is made to broadband improvements, medical centre and school place capacity in a general sense. Alongside this, the document also highlights infrastructure concerns regarding the A449. The document sets out that meetings are required with Highways England to confirm the improvements required once the preferred locations for growth are known. This will ensure that the necessary mitigation measures are identified.

We invite the Council to consider in more detail any further infrastructure requirements that may be deemed necessary to unlock development in the area of South Staffordshire bordering the western edge of the Black Country.

Sustainability Appraisal

The Sustainability Appraisal highlights option G as being the most sustainable option overall. Nevertheless, options D, E and F are broadly similar in sustainability terms. We therefore consider that the merits of options D to G should be reconsidered by the Council again in more detail, before reaching its final decision regarding selection of the spatial strategy. Particular attention should be paid to the impacts on sustainability of development in South Staffordshire which borders the western edge of the Black Country.

Landscape Assessment

In the Council's Landscape Sensitivity Study report, produced by LUC, the site was considered as part of a wider area described as Area SL7. The overall assessment concluded that the parcel has a “**high**” landscape sensitivity.

A Landscape & Green Belt Appraisal has been produced by FPCR. Using the same criteria, in relation to Parcel 2, this sets out that that this parcel would have a “**Low/Moderate**” landscape sensitivity rating. The land north of Lawnswood Road is described as Parcel 1 and this study concludes this area has a “**moderate**” sensitivity rating as this area currently is more open than parcel 2.

FPCR consider that the sites contained in this appraisal could provide these measures. A broad new area of Green Infrastructure could be provided within parcel 2 and wrap around potential development forming a strong new Green Belt Boundary along the A449. The Staffordshire “Planning for Landscape change” document highlights woodland planting as appropriate in this area. A strong new woodland belt could be provided, following established landscape guidance.

Strategic Housing Market Assessment

The consultation document sets out that there is a significant shortfall within the Birmingham Housing Market Area ('GBHMA'). As part of the GBHMA, South Staffordshire is proposing to contribute upto 4,000 dwellings towards meeting the unmet need. We consider that this figure is not backed up with robust evidence. As yet, the shortfall is yet to be distributed across the HMA authorities. We therefore consider that the Council should work with GBHMA authorities to agree a figure before setting a housing need figure within its Local Plan Review.

Self-build

The Council should also provide a clear evidence base to justify policies in relation to self-build homes and traveller sites. A number of Local Plans submitted for examination in the last 12 months have placed a requirement for self-build housing to be provided within medium sized residential allocations. Such provision should be attributed to Site specific allocations, which the Council can provide evidence base in support of. Supply of such housing should not be proposed in a blanket fashion across housing allocations.

Question 3) Do you agree that all Safeguarded Land identified in the SAD should be released as a priority and should be delivered at an average density of 35 dwelling per hectare?

This is a blanket requirement and site specific circumstances should be considered. Time has elapsed since these sites were safeguarded. They should therefore be reappraised in line with Paragraph 120 of the NPPF (2019) which requires that planning policies should reflect changes in the demand for land and should be informed by regular reviews of allocated sites and their availability.

A blanket requirement for 35 dwellings per hectare across a range of sites is also a unnecessarily onerous requirement. Paragraph 122 of the NPPF (2019) states that planning policies should support development that

makes efficient use of land, taking into account the identified need for different types of housing, local market conditions and viability, availability and capacity of infrastructure and services, desirability of maintaining an area's prevailing character and setting and the importance of securing well-designed, attractive and healthy places. Therefore, once again site specific circumstances should be considered when having regard to the suitable density of a development.

Question 5) Do you agree that the 7 Spatial Housing Options set out above are appropriate options to consider? Are there any alternative options we have not considered?

We consider that a greater focus should be placed on delivery of housing adjacent to the Black Country conurbation. This is required not only to provide housing for South Staffordshire residents, but to deal with the Black Country shortfall and therefore provide much needed housing for their residents. In terms of sustainability, these locations offer close proximity to shops, services and public transport links. As is identified in the Spatial Strategy document, a large proportion of South Staffordshire residents commute outside of the District for work. Therefore the proposed strategy should focus on development adjacent to the Black Country Conurbation allows future residents to take advantage of these opportunities.

If development is located adjacent to the Black Country Conurbation, consideration should be given to the services and facilities available in this locality. Within the adopted Black Country Core Strategy, nearby Stourbridge is categorized as a Town Centre, whereas Wall Heath and Kingswinford are highlighted as "District and Local Centres". This demonstrates the level of local facilities that are available in the adjacent Black Country area.

Question 6) Do you agree that Spatial Housing Option G is a robust approach to meet needs in the district and to make a contribution towards unmet needs in the GBHMA?

We agree with the general approach that a combination of Green Belt release and development in existing settlements is required. However the new settlement proposed near Penkridge is by the Council's own omission not developable within the Plan period and should therefore be considered as an undeliverable option. Option G would be more robust by allowing for more development adjacent to the Black Country Conurbation. This would allow for the utilisation of services and employment opportunities within the Black Country. This is in contrast to delivery of a new settlement which would take a significant time to deliver, due to the scale of new infrastructure required. It should also be noted that these proposed development locations are not in such close proximity to services and employment opportunities, such as those provided in the Black Country.

As option G is an "infrastructure-led" approach, more development should be directed to areas adjacent to existing sustainable settlements, such as the Black Country. We consider that extensions to the neighbouring urban area can utilise existing infrastructure, services and employment opportunities in these areas. Furthermore, where improvements are required, there is an existing critical mass of residents in the Black Country to enable these improvements to be viable and able to be developed quickly.

We urge the Council to disregard options A, B and C as they do not appear to be fully meet the housing requirement and perform the weakest in terms of the Sustainability Appraisal. We support elements of options D,F and G which look to utilise the district's location adjacent to the services and employment opportunities within the Black Country. We disagree with the emphasis placed on affordable housing for young people as a guiding principle for spatial approach, as set out in option E. Affordability should be only one consideration alongside others to ensure sustainable development. Overall option G is our preferred approach. However the approach taken by this option should be modified to remove reference to a new settlement near Penkridge

Question 7) Do you agree that we should continue to explore options for a new settlement?

No. New settlements take a long time to deliver, as has been referenced in question 6 above. This is particularly relevant to the proposed new settlement near Penkridge, even though it has support within the Greater Birmingham Growth Study and other documents. We consider that development should be directed towards locations which have existing infrastructure and can deliver housing within the Plan period.

Question 8) What other information (if any) should we consider before concluding that Green Belt release is justified?

Paragraph 137 of the NPPF requires LPAs to first look at making use of suitable brownfield sites and underutilised land, optimising density of development and discussing accommodating development needs from other authorities. The GBHMA housing shortfall as well as meeting the District's housing need, lack of brownfield sites in the District and HMA and the NPPF's requirement to locate housing in sustainable locations should be considered to be exceptional circumstances. The Council is also seeking to increase densities across its SAD sites. We therefore consider that the LPA has looked at all options and therefore the release of Green Belt land is justified.

The Green Belt assessments produced by the Council only consider broad parcels for development. We consider that individual site specific assessments of Green Belt should be considered in the Council's analysis of the suitability of Green Belt land for development. This can provide an in depth analysis of the relative strength of Green Belt and potential mitigation and or exceptional circumstances that may justify Green Belt release.

Question 9) Have we identified the key criteria for the identification of sites (as set out in Appendix 6)? Are there any other factors we should consider?

We request that an amendment is made to section 4 of the criteria listed in appendix 6. This makes reference a 2019 Green Belt Study. We understand this is referring to the 2019 LUC South Staffordshire Green Belt Study. We consider that the Council should be careful to make a separate reference to the joint Green Belt work that we understand is being jointly undertaken with the Black Country authorities. Both assessments should be considered when drawing conclusions about the suitability of Green Belt land for development.

We do not support the current proposed approach to site selection as paragraph 2.2 of Appendix 6 - Site Selection Methodology for Preferred Options. We disagree that emphasis should be placed on consideration of a site's development potential in line with the preferred level of growth for that broad location. If option G is selected without the amendments we have proposed in question 6, this infrastructure led strategy will lead to an uneven distribution of development as the majority of growth is being directed to the north of the District and a relatively smaller proportion is proposed elsewhere in the district.

Question 10) Do you agree that, when selecting sites to deliver the preferred spatial housing strategy, the Council should seek to avoid allocating housing sites that would result in very high Green Belt harm wherever possible?

The council should not impose a blanket restriction on development of sites which are classed as having a 'very high' Green Belt harm with the Council's Green Belt study. A broad Green Belt assessment is only one part of the evidence base that the Council should consider when determining suitable locations for development. The Council should also consider a range of other technical evidence base and consideration such as the site's proximity to employment opportunities, shops and services, especially where these are provided in a neighbouring authority that lies immediately adjacent to potential site opportunities.



Compensatory measures that can be employed in relation to the loss of Green Belt land should also be considered. Finally it should be noted that the Council's conclusion regarding the harm likely to occur from development in the Green Belt relates to broad land parcels rather than site specific characteristics. South Staffordshire Council should therefore consider a wider range of technical work, including Green Belt studies which are undertaken at a site specific scale, when Green Belt release and strategic site options are under consideration.

I trust that you find the representations set out in this letter suitable for inclusion as a response to the consultation. Please do not hesitate to contact me should you have any questions regarding these representations.

Yours faithfully



Michael Davies
Director

Appendix A – Site Location Plan



Appendix B – Design Framework



LEGEND

- | | | | |
|-----------------------------------|----------------------------|----------------------------|-----------------------------------|
| Site boundary (2010/04) | Existing public footpath | Contour levels | Proposed swale |
| Land use | Redirected public footpath | Existing tree canopy | Historic setting |
| Residential development (2010/04) | Primary avenue | Existing hedgerow | Grade II listed building |
| Public Open Space | Circulation road | Proposed tree/vegetation | Local historic environment record |
| Children's play area | Residential street | Existing waterbody | |
| Access & movement | Informal street | Existing watercourse | |
| Existing footway | Proposed all-mode access | Proposed attenuation basin | |
| Strategic pedestrian/cycle link | | | |

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For more information:
 Site: Lownwood House, Walsley
 Client: Closures Developments
 Title: Design Framework
 Scale: 1:2000 @ A1
 Drawing No: 004
 Revision: A
 Date of Issue: 11.12.2010
 Drawn by: AJF
 Checked by: CLO0548

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