

HEARING STATEMENT

MATTER 7: SITE ALLOCATIONS

BLOOR HOMES LTD (LAND EAST OF BILBROOK SDL)

1. ISSUE 1

Whether the preferred site allocations are positively prepared, justified, effective and consistent with national policy.

Question 1: In terms of the proposed planned housing and employment developments

a. Has the identification and selection of the proposed site allocations been robustly evidenced and subject to robust, consistent and transparent methodologies, including in relation to the approach to existing committed sites?

1.1 The approach to existing committed sites is 'sound' including the proposed allocation of sites safeguarded to meet longer-term housing needs through the Site Allocations Document (SAD). These sites were considered by an Independent Inspector at the SAD EiP and deemed to be 'sound.'

d. What evidence is there that education provision can be secured in a sustainable manner to support each of the housing allocations?

1.2 In respect of Land East of Bilbrook, the proposed SDL secures the provision of a new First School. Education provision has been discussed with SCC Education through the masterplanning process and through pre-application discussions, and the school is included in the pending planning application.

1.3 A new First School is required to serve Codsall/Bilbrook, including planned growth on land previously safeguarded to meet longer term housing needs.

f. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?

1.4 The Council has undertaken a Strategic Flood Risk Assessment (SFRA) that considers risk of flooding from all sources. A Stage 2 SFRA assessment of Land East of Bilbrook [EB64c] concludes that *"the majority of the site itself is at low risk of flooding and the principle of development can be supported by implementing practical schemes based on appropriate understanding of the flood hazards."*

1.5 The pending planning application is accompanied by a Flood Risk Assessment and Drainage Strategy. No objections have been raised by the EA or LLFA.

Question 2: In terms of Policy MA1:

a. Is it clear how a Strategic Master Plan produced by an applicant will be agreed by the Council?

- 1.6 Bloor Homes supports the position that Strategic Masterplans (SMPs) can be approved as part of the planning application process, including where an application is submitted in advance of the adoption of the Local Plan.
- 1.7 This is essential due to the acute deliverable housing land supply shortfall being experienced in the district at present.

2. ISSUE 2

Whether the preferred housing sites are justified, effective and consistent with national policy?

Question 1: For Land East of Bilbrook SDL

a. The background to the site allocation and how it was identified

- 2.1 The site has been promoted by Bloor Homes through the plan making process. The site has been fully considered through the Council's site selection process in light of the published evidence.

b. How the site contributes to delivering the spatial strategy

- 2.2 The site is located in one of the most sustainable villages within the district with a greater level of services and facilities in comparison to other villages.
- 2.3 The site was identified within the Strategic Growth Study (SGS) as a sustainable location for 'proportionate dispersal' to assist in meeting the identified unmet shortfall across the HMA. Locations for proportionate dispersal were identified as smaller scale developments of between 500 and 1,200 dwellings, to be delivered through individual Local Plans.
- 2.4 The site contributes to the infrastructure-led strategy approach by delivering on-site infrastructure, including the provision of a new First School that is required to support development of the previously identified safeguarded land parcels in both Bilbrook and Codsall.

c. Are the boundaries and extent of the site correctly identified

- 2.5 Yes.

e. The anticipated housing capacity of the site, how this was determined and is it justified;

- 2.6 The anticipated housing capacity has been refined through a rigorous masterplanning exercise. This resulted in a reduction in overall yield from a minimum of 848 dwellings in the 2022 Publication Local Plan to 750 dwellings.
- 2.7 The outline planning application proposes up to 750 dwellings plus provision of up to 75 specialist older person units. The anticipated housing capacity is considered justified.

f. For any mixed-use proposals within it, the estimated floorspace of non-residential uses;

2.8 The outline application proposes the following non-residential uses:

- 1.3ha for the provision of a First School (1FE of 0.8ha + expansion land for further 0.5FE)
- 0.5ha for Local Centre including up to 1,000m² of commercial/community uses including up to 500m² of retail floorspace
- 0.6ha for the provision of specialist older persons housing (up to 75 units)

g. How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary;

2.9 The relevant technical constraints have been assessed through the Council's site selection process, having regard to the published evidence base.

2.10 The Council's Site Selection Paper [EB20] sets out the site selection methodology and the interaction with the Sustainability Appraisal process. The conclusions in respect of Land East of Bilbrook are set out at paragraphs 5.3.8 and 5.3.9.

2.11 As part of the masterplanning process all constraints and opportunities were fully explored with a wide range of stakeholders. This process, in addition to community engagement, has informed the outline proposal currently pending determination. The application pack includes a range of technical documents that consider the technical constraints and any necessary effective mitigation.

i. Where applicable, evidence of whether the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy approach to heritage will be met;

2.12 The Council's HESA [EB75] identifies a medium predicted impact as development of the site would be visible from the Shropshire Union Canal Conservation Area. This 'amber' scoring leads to the following recommendations:

- A detailed programme of archaeological mitigation
- Compensatory planting and set back of development from the site's eastern boundary in respect of the setting and character of the Shropshire Union Canal Conservation Area

2.13 Both a Built Heritage Statement and an Archaeology Statement have been submitted in support of the outline planning application, setting out an

approach to archaeology and addressing the setting and character of the Conservation Area.

j. Evidence of the expected timescale and rate of development, and whether they are realistic;

2.14 The rate of development is considered realistic. The expected timescales for commencement of delivery will be dependent on the development management process.

k. The highways implications of the site, including accesses and the effect on the highway network;

2.15 A Strategic Transport Assessment [EB87] has been prepared to form part of the evidence base to support the Local Plan. This has been considered by SCC, CWC and National Highways.

2.16 The STA identifies a strategy for access to the development by vehicles, pedestrians, cyclists and public transport users, including off-site mitigation measures.

2.17 The STA also considers the capacity of the proposed access junctions and off-site junctions and identifies mitigation measures.

2.18 It concludes the residual impact of the development on the local highway network would not be severe subject to implementation of the mitigation measures identified.

2.19 A separate Strategic Road Network Impact Assessment [EB90] assesses the cumulative impact of the proposed strategic sites on the Strategic Road Network and concludes that mitigation would not be required at any junction to accommodate the proposed site allocations. It should be noted that this assessment represents a worst-case scenario as it included two further SDLs that are no longer identified in the emerging Local Plan.

2.20 The pending planning application is supported by a Transport Assessment that demonstrates the site can be accessed safely and development traffic can be accommodated on the local network subject to the delivery of identified mitigation.

m. How the necessary infrastructure requirements will be funded and delivered in line with anticipated delivery timeframes.

2.21 The outline planning application identifies draft Heads of Terms in respect CIL Regulation 122 compliant infrastructure requirements.

- 2.22 On site infrastructure including the Community Hub, green and blue infrastructure will be delivered in phases in line with the submitted phasing strategy. The phasing strategy has been informed by the masterplanning process and specific triggers for key elements of infrastructure, including the school.
- 2.23 The masterplan has been designed to ensure the public open space (including play provision), access and drainage infrastructure is delivered alongside residential parcels.
- n. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period.*
- 2.24 The site is in the control of a national housebuilder and an outline planning application has been submitted in respect of the whole SDL allocation. Following the extensive masterplanning process there is confidence that the site can deliver 750 homes, and all other requirements set out in Policy SA1.
- o. What is the situation with regards land ownership, land assembly and developer interest; and*
- 2.25 Bloor Homes controls the whole site through a combination of freehold ownership and option agreements.
- q. What are the conclusions of the Green Belt Study in relation to the contribution of the site to the purposes of the Green Belt and the potential to alter the Green Belt in this location?*
- 2.26 It should be noted that Land to the East of Bilbrook incorporates 12.5ha of land that was safeguarded to meet longer term housing needs within the Site Allocations Document. Other elements of the site lie within Parcel S46 in the Council's Green Belt Study. This is a broad parcel that extends from the M54 to the north down to the Wolverhampton-Shrewsbury train line to the south. The parcel encompasses the whole gap between Bilbrook and the edge of the Wolverhampton conurbation.
- 2.27 The contribution of Parcel S46, as a whole, to the purposes of the Green Belt does not represent the contribution of the East of Bilbrook SDL to these purposes.
- 2.28 Parcel S46, which includes land beyond the SDL, is determined to make a strong contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment into the countryside. The Green Belt Study recognises that those parts of the parcel that do not extend into the more vegetated River Penk corridor (including the SDL) are more closely associated with adjoining

existing development and therefore their release would constitute only a limited weakening of the Green Belt.

r. How would the proposed release of land maintain the openness and permanence of the Green Belt?

- 2.29 The River Penk corridor to the south and east, adjacent woodland to the south east, Barnhurst Road to the West and Pendeford Mill Lane to the north would all form new, strong, physical Green Belt boundaries that could endure beyond the current plan period.

s. What would be the effect of developing the site on the purposes of the Green Belt?

- 2.30 The effect would constitute only a limited weakening of the Green Belt as set out in the Green Belt Study. Therefore it would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole.

t. Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?

- 2.31 There is a need to release Green Belt to deliver a sustainable spatial strategy to meet identified housing needs. Codsall and Bilbrook include a wide range of services and facilities with Codsall centre identified as a top tier 'Large Village Centre' in the Council's retail study. Codsall and Bilbrook both have a railway station on the Shrewsbury-Birmingham line with regular services to Wolverhampton and Birmingham city centres. Residents also have close access to the i54 strategic employment site and Balliol Business Park.
- 2.32 There is predicted to be a significant housing shortfall across the GBBCHMA and this significant shortfall supports the exceptional circumstances case for releasing Green Belt at the district's most sustainable settlements with the best sustainable transport links to the conurbation that are the source of the unmet needs.
- 2.33 Codsall and Bilbrook include several education facilities within the settlement with one high school, two middle schools, and four first schools. Development within these villages is also required to deliver a new first school as without the delivery of housing on Green Belt it is unlikely that there will be sufficient homes (and therefore pupils) to deliver, and sustainability operate the new first school. A new First School is needed to mitigate the effects on education at the non-Green Belt safeguarded land sites already identified i.e. the quantum of

development at Codsall/Bilbrook needs to be of a scale that would deliver and support a new first school.

- 2.34 Green Belt release in the Tier 1 settlements is necessary to ensure a sustainable pattern of development across the district over the plan period and is a key part of the rationale for exceptional circumstances.

u. What is the basis for the proposed Green Belt enhancements? Are they justified and appropriate and how will they be delivered?

- 2.35 The masterplan identifies 16.2ha of green and blue infrastructure, including an element of the site that is to remain within the Green Belt.
- 2.36 the Masterplan has evolved around an aspiration to create a well-integrated and landscape led new neighbourhood. Green spaces are designed to provide connections around the site that are of value to both residents and wildlife. They will provide opportunities for informal play, recreation, walking and cycling and will be designed to retain existing landscape elements where possible, and integrate new planting that enhances the local character.
- 2.37 The area of land to be retained within the Green Belt is proposed as a natural open space for enhancing local habitats. Designed for ecology, it will feature leisure routes and new woodland planting. This element of the scheme will improve the environmental quality/increase biodiversity of the area and provide improved public access to this remaining Green Belt land as part of wider active travel routes.

