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Our Ref: **MYF/JBB8353/C5511**

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By email (blackcountrycorestrategy@dudley.gov.uk)

Black Country Core Strategy Review
Council House
Priory Road
Dudley
DY1 1HL

Dear Sir / Madam

**BLACK COUNTRY CORE STRATEGY (BCCS) REVIEW: CALL FOR SITES
LAND AT STENCILS FARM, ALDRIDGE ROAD, WALSALL**

RPS Planning & Development (“RPS”) is instructed by Barratt Developments Plc (“Barratt”) to submit a Call for Sites response in relation to proposed residential development on land at Stencils Farm, Aldridge Road, Walsall. The Call for Sites Form has been completed and this letter provides further information on the site and proposed development.

Barratt secured an interest in the land at Stencils Farm during 2016. After the land was offered to them by the landowner’s agent, Barratt reviewed the Black Country Authorities’ published data on potential housing need over the BCCS review period (2014-36) and recognised that Green Belt release is likely. Barratt instructed RPS to assess the credentials of the site and the parameters to residential development, which informed the offer to the landowner, which has now been accepted. A “Development Framework” plan has been produced to reflect various technical assessments which were completed in spring 2017 (enclosed – see below), and which indicates a **potential site capacity of c.570 dwellings set within 18ha of green infrastructure**, providing enhanced linkages to existing wildlife corridors.

The following documents are provided in support of the Call for Sites submission:

- Completed Questionnaire;
- Location Plan (Ref. 7722-L-01) (appended to the completed Questionnaire);
- Landscape and Visual Appraisal Report (FPCR);
- Transport Feasibility Assessment Report (RPS);
- Ecology Constraints and Opportunities Plan (OXF10235-001A), Features of Ecological Importance Plan (OXF10235-002) and accompanying Report (RPS);
- Constraints and Opportunities Plan (7722-L-02 Rev B);
- Development Framework Plan (7722-L-03 Rev D); and
- Landscape and Green Belt Assessment of Walsall Strategic Sites (FPCR)

This letter provides a site description, an overview of the proposed use/development and a demonstration of its “*deliverability*” for residential development (NPPF para. 47).

Description of Site and Surroundings

The land at Stencils Farm comprises c.37ha of greenfield land to the north of Aldridge Road (A454) and immediately east of the suburban estates accessed off Mellish Road. Walsall town centre lies c.3km to the west and Aldridge lies 3km to the north-east.

The site is currently used for agriculture, comprising four arable fields and an area of grassland/wetland to the north which is designated as a Site of Nature Conservation Importance (SINC). The entire site is designated as Green Belt. The fields are separated by hedgerows which include trees, and the hedgerow to the south is proposed to be designated as a "Linear" Site of Local Nature Conservation Importance (SLINC) within Walsall's emerging Site Allocation Document (SAD). A public right of way crosses the site providing a linkage from Aldridge Road to Aldridge via the listed Riddion Bridge to the north. These features are identified on the enclosed Constraints and Opportunities Plan.

The eastern boundary of the site is formed by the Wyrley and Essington Canal (Daw End Branch) (designated as a "Greenway" and SLINC). Open fields and areas of woodland (including Park Lime Pits, which is an area of open space designated as a Local Nature Reserve, SINC and Greenway) form the northern boundary. To the south is Aldridge Road which is dualled in this section. To the west are residential areas accessed from Burton Farm Road, Stencils Road and Mellish Drive. Walsall Council is currently considering an outline planning application for up to 12 dwellings on the Stencils Farm caravan park site (Ref. 17/0155), which lies immediately west of the subject site (this land is proposed as a residential allocation (Ref. HO208) in Walsall's emerging SAD). To the south of Aldridge Road lies Calderfields Golf and Country Club and the Dilke Arms public house and, beyond these, Walsall Arboretum.

The Proposed Use

The Development Framework Plan reflects the identified constraints and opportunities to provide an indication of the potential capacity of the subject site for residential development.

Key principles are as follows:

- Provision of a strategic area of green infrastructure to the east and north with the creation of a canalside linear park which provides a new settlement edge; a soft transition to the canal and countryside to provide a strong defensible Green Belt boundary. This area provides appropriate buffers to protect and enhance the nature conservation designations. Furthermore, it would provide a linkage between the existing Wildlife Corridors and open space to the west and south;
- New tree and shrub planting, particularly on the built edges, to protect and enhance localised views from roads, footpaths and the canal (including a landscape buffer on the Aldridge Road frontage);
- **Total green infrastructure amounting to 18ha (48% of the site)** which greatly exceeds Walsall's current public open space requirement (c.3.6ha);
- Primary access taken from the existing Aldridge Road roundabout to serve the first phase of development; Plots A-E – c.250 dwellings – and possibly one further land parcel to north (H/K). Secondary access provided from Aldridge Road for remainder of development (left in and left out junction) to the east;
- Net developable land parcels amounting to 19ha (51% of site) interspersed with green corridors including footpaths (public right of way retained) and cycleways (and retained hedgerows and trees). This achieves an **indicative capacity of 570 dwellings at**

30dph which is considered an appropriate average density for the wider context and for an urban extension to Walsall;

- Potential for a pedestrian/cycle linkage to the Stencils Farm housing development to the west; and
- New drainage ponds to be provided as part of a sustainable urban drainage strategy within the areas of green infrastructure where ground levels are lowest, providing new habitats.

No community facilities are shown on the Development Framework due to the accessibility of existing facilities but the capacities of existing schools and health centres will be reviewed through future stages of work. Local retail facilities could also potentially be required to serve the needs of the new residents but, again, this will be discussed with Walsall Council and the local community.

Deliverability

We demonstrate below the deliverability of the site having regard to the three criteria set out within national policy (NPPF para. 47).

Suitability

Footnote 11 to para. 47 of the NPPF states that to be considered deliverable sites should “...offer a suitable location for development now”. The NPPG (para. 019 Ref ID: 3-019-20140306) outlines the factors which should be considered when assessing “suitability”. These factors are considered in the Table below, drawing upon the enclosed technical assessment reports. This reveals that the site is a “suitable” location for development now.

Assessment against “Suitability Factors” from Planning Practice Guidance

Factor	Relevance to Stencils Farm
Green Belt	<p>The Issues and Options consultation document acknowledges that the scale of housing need across the Black Country is likely to require Green Belt release and commits to undertake a Green Belt Review during 2018.</p> <p>We have identified eight strategic Green Belt sites within Walsall which have been promoted through previous Call for Sites consultations. These include the land at Stencils Farm. FPCR have assessed these sites against the five purposes of Green Belt (NPPF para. 80) and in relation to landscape and visual sensitivity/quality. The results are presented in the enclosed FPCR report and the land at Stencils Farm was assessed as making the second lowest contribution towards the five purposes of Green Belt:</p> <ul style="list-style-type: none"> • The site is well contained by the canal and dual carriageway, which could be used to redefine the Green Belt and provide a physical and permanent boundary. • No sensitive heritage setting considerations were identified. • Although Walsall and Aldridge would become closer, inter-visibility would be limited due to topography and intervening vegetation. • The site is considered to be open countryside, although the road and urban influences from commercial properties slightly impact on the tranquillity of the site.

	<p>Given the scale of the housing shortfall currently facing Walsall and the wider Black Country, it is possible that several of these strategic Green Belt sites may need to be released to deliver housing. However, it is apparent that Stencils Farm is one of the most appropriate sites in the Borough for release and allocation given that its contribution to the Green Belt has been assessed as “slight to moderate” (only one other strategic site has been assessed as making less of a contribution).</p>
Local Plan Spatial Strategy	<p>The BCCS provides a “brownfield first” strategy which didn’t require the release of any Green Belt land but the Issues and Options Consultation Paper rightly acknowledges that the current level of need will require this strategy to be reviewed and, given the potential scale of the housing shortfall, it is inevitable that Green Belt land will need to be released (comprising an “exceptional circumstance”). As stated above, the land at Stencils Farm provides the most sustainable and accessible Green Belt site in Walsall.</p>
Physical Limitations	<ul style="list-style-type: none"> • No part of the site is at risk of flooding; • As a greenfield site there are unlikely to be any constraints relating to ground conditions / remediation; • The site adjoins the built-up area of Walsall and Aldridge Road so utilities connections are likely to be straightforward and will not represent an overriding constraint; • The Transport Feasibility Assessment concludes that there are opportunities to “open up” the site with pedestrian and cycle links; the site is highly sustainable, benefitting from very good public transport accessibility and is within walking/cycling distance to key services and facilities; and, the potential traffic impacts are not regarded as “severe”.
Landscape	<p>The enclosed Landscape and Visual Appraisal concludes that:</p> <ul style="list-style-type: none"> • The site does not convey any particular sense of scenic quality, does not contain rare or unusual landscape features and does not comprise a landscape of high value; • The site has a relatively restricted visual envelope with close range receptor views generally within the context of adjoining urban development but these will need to be respected and enhanced through new landscaping/green infrastructure; • The development should provide an appropriate settlement edge in the form of a linear canalside park, forming a soft transition between the new development and countryside to the north and east and providing a linkage between the two adjoining “Wildlife Corridors” and areas of open space; and • The development should enhance connectivity to open spaces and wildlife habitats; protect the setting of the Riddian Bridge (listed); protect features of local value – established hedgerow, tree belt, marshy grassland, public footpath; extend the rights of way network; and, provide drainage opportunities including ponds in low lying areas.
Potential Environmental /Amenity Impacts	<p>The ecological assessment has identified features of high importance (including SINCS, SLINC and a designated hedgerow including mature trees) and features of moderate importance (hedgerows, trees and seasonal ponds). The Development Framework demonstrates that these will all be</p>

	<p>safeguarded as part of the development. Furthermore, it will incorporate the recommendations of the ecological assessment including:</p> <ul style="list-style-type: none"> • Green space stand-off/buffers of 10-20m between built development and designated sites; • Incorporation of features within comprehensive Green Infrastructure scheme to strengthen linkage between Park Lime Pits and the Canal and create new habitats such as native hedgerows, tree/shrub planting (especially on the eastern and western boundaries) and drainage ponds; and • Retention of bat flight lines. <p>A series of specific surveys are recommended and will be undertaken during the appropriate survey periods to further evolve the Development Framework.</p>
Market Attractiveness	The site lies within an attractive and desirable area of Walsall, with good access to employment and key facilities. As such, it is considered to be a site which will be highly attractive to the market.
Regeneration Priority Areas	Although not within a regeneration corridor, the proximity to Walsall means it provides a sustainable option for growth, which will help to support the vitality and viability of the town centre.

Availability

Footnote 11 to Para. 47 of the NPPF states that to be considered deliverable, sites should be “available now”. The NPPG (para. 020 Ref ID: 3-020-20140306) adds that a site is considered available “...when on the best information available...there is confidence that there are no legal or ownership problems...”. It can be confirmed that Barratt have secured an interest in the site for residential development. The landowner has, therefore, expressed an intention to sell and the UK’s largest housebuilder has a strong interest in developing the site as soon as possible, subject to the land being allocated within the BCCS Review (and following the grant of planning permission).

There are no legal/ownership problems which would prevent the land from being delivered for residential development (either in whole or in part). It can, therefore, be concluded that the subject site is “available” now.

Achievability

Footnote 11 to para. 47 of the NPPF states that to be considered deliverable, sites should “...be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable”. The NPPG adds that “A site is considered achievable...where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and the capacity of the developer to complete...the development over a certain period” (para. 021 Ref ID: 3-021-20140306).

In relation to a delivery programme, and having regard to the anticipated adoption date of the BCCS Review – 2021 – the view is taken that first completions could occur in 2021/22 and that the entire c.570 dwellings would be delivered by 2027/28; the scale of the site would permit two housebuilders to be on-site delivering dwellings simultaneously.

Clearly, Barratt have the capacity to deliver, being the UK's largest housebuilder by volume. They are fully committed to bringing this site forward as soon as possible and could provide a full range of dwelling types

In terms of viability, the site lies within an attractive and aspirational area of Walsall. The site is greenfield and will not be subject to any major remediation, preparation or infrastructure costs (benefitting from an existing roundabout access from the A454). Moreover, there are no technical/environmental constraints which will require significant costs to overcome. It is therefore concluded that residential development of the site will be viable.

In summary, the site will deliver a significant number of much-needed dwellings in the medium term in a sustainable location, a leading national housebuilder is already involved to facilitate swift delivery and the proposed development is viable. As such, the site is "achievable".

Conclusions

The land at Stencils Farm provides a highly sustainable option to assist in delivering the emerging housing need through the BCCS Review. Of the eight strategic residential Green Belt sites in the Borough previously promoted for residential development, Stencils Farm has been assessed as providing the second lowest contribution to the five national purposes of Green Belt. It lies close to Walsall town centre with good public transport and walking/cycling links to local facilities, and is well contained, providing a valuable opportunity to create a robust settlement edge and Green Belt boundary with a soft transition to the countryside. This transition would comprise a strategic area of green infrastructure adjoining the canal, providing a linkage between two "Wildlife Corridors".

The site is deliverable and we respectfully request that it be considered as an allocation through the BCCS Review. Barratt intend to fully engage with Walsall Council and the local community over forthcoming months to discuss the site and proposed development in greater detail, but should you require any further information in the meantime please do not hesitate to contact me.

Yours faithfully
for RPS

[Redacted signature block]

ASSOCIATE DIRECTOR

[Redacted contact information]

cc.

Enc.