

On Instructions from



For

A Development Plan Representation

At

Land at Cannock Road, Wolverhampton

September 2017

11810

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Date: 7th September 2017

Version: 1

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1. INTRODUCTION

- 1.1 Bruton Knowles have been instructed by [REDACTED] to prepare a representation to the Black Country Core Strategy Issues and Options document (June 2017). The clients are aware the land forms part of a larger representation, submitted by Taylor Wimpey, but want to ensure the local authority is aware the site is available either as a stand-alone parcel of land or as part of Taylor Wimpey's submission.
- 1.2 The report therefore has been written from the perspective of a far smaller site coming forward and not all questions will be relevant. It is considered only the some of the questions are considered directly applicable insofar as my clients individual site is concerned.

2. ISSUES AND OPTIONS

2.1 **Question 1 – Do you agree that the Core Strategy review should be a partial review, retaining and stretching the existing spatial strategy and updating existing policies? Yes/No; If not, what do you think should be the scope of the review?**

2.2 The Core Strategy was adopted prior to the publication of the National Planning Policy Framework, and therefore is likely to be considered out of date which provides an additional layer of uncertainty should the review be adopted. That said, if the review is as comprehensive as it appears to be the case so far, this may limit any questioning of the Development Plan.

2.3 **Question 3 – Do you agree that the housing need identified for the Black Country over the period 2014-36 in the SHMA, and the anticipated amount of supply, are appropriate and in line with national guidance? Yes/No; If not, please explain why they are not appropriate and in line with national guidance**

2.4 There is the risk that the numbers required for the whole of the Housing Market Area may not have been included within the plan period, and it probably won't be known if these numbers are appropriate until the results of the current call for sites are analysed.

2.5 **Question 5 - Do you agree with the proposed approach to the Black Country Green Belt Review? Yes/No; If not, what additional work do you think is necessary?**

2.6 It is agreed there will be a significant housing need within the Black Country and the wider HMA, since the Core Strategy was adopted and a need for employment land, which will require the identification of new sites on land outside the urban area that is not currently proposed for development.

- 2.7 **Question 6 – Do you agree that the key issues set out in Part 3 are the key issues that need to be taken into account through the Core Strategy Review? Yes/No; If not, what other key issues should be taken into account?**
- 2.8 Yes, these issues reflect the needs which are required within the Core Strategy Review.
- 2.9 **Question 7 - Do you think that the Core Strategy vision and sustainability principles remain appropriate? Yes/No; If not, what alternatives would you suggest?**
- 2.10 We are not aware that the NPPF provides a sequential test for Brownfield land but clearly encouragement of the use of Previously Developed Land is welcome.
- 2.11 Perhaps the Core Principles of the NPPF could be worked into the sustainability principles.
- 2.12 **Question 8 - Do you think that the Core Strategy spatial objectives remain appropriate? Yes/No; If not, what alternatives would you suggest and how might these changes impact on individual Core Strategy policies?**
- 2.13 The 10 objectives do not refer to the 'golden thread' of sustainable development which could be emphasised, and a boost of housing is not referred to as per paragraph 47 of the NPPF. Both of these are considered to be relevant if the review is not going to be challenged upon adoption.

- 2.14 **Question 12a – Do you support Spatial Option H1? Yes/No; what criteria should be used to select suitable sites? e.g. ability to create a defensible new green belt boundary, size, access to existing residential services**
- 2.15 Our client's land could either "Round off" the edge of the green belt, as per H1, or could be part of a wider urban extension (H2). However for the purposes of this representation our client prefers H1.
- 2.16 **Question 12b – Do you think there are any potential locations that should be considered? Yes/No; If yes, please provide details (please submit specific sites through the 'call for sites' form).**
- 2.17 Yes our client's site has been submitted as part of the call for sites.
- 2.18 **Question 13a – Do you support Spatial Option H2? Yes/No; what should the characteristics of Sustainable Urban Areas (SUEs) be? e.g. minimum/maximum size, mix of uses, mix of housing types, accessibility to other areas. What criteria should be used to select suitable sites? e.g. proximity to a rail station, availability of existing infrastructure, easy access to jobs, potential to support existing settlements / services, proximity to the existing growth network, potential to support urban regeneration.**
- 2.19 Q 13(a-d) and Q14, It is understood my clients' site has been submitted as a wider SUE and detailed answers will be provided.

- 2.20 **Question 15a - If all housing need cannot be met within the Black Country, do you support the 'export' of housing growth to neighbouring authorities within the HMA? Yes/No; What factors should be taken into account in an assessment of the opportunities in neighbouring authorities e.g. proximity to the edge of the urban area, proximity to a rail station, availability of existing infrastructure, easy access to jobs?**
- 2.21 Only if all opportunities to release land such as my clients' site has been fully located.

3. LAND OF CANNOCK ROAD (SUBJECT SITE)

- 3.1 The subject site is approximately 3.2 hectares and is located on the outskirts of Wolverhampton and is positioned opposite to Cannock Road, which provides direct access onto the M54 (1.3 miles distance). Wolverhampton City Centre is located 2.5 miles south of the site.



(Subject Site Outlined in Red, Google Maps 2017)

- 3.2 The area in which the site is located has a high level of public transport provision and a high level of service/facility provisions. Included within a 0.5 mile radius is: a supermarket, various restaurants, a petrol filling station and various educational and child care facilities.
- 3.3 Directly adjacent to the site is the Old Hampton Lane Bus Stop, which provides frequent direct services to both Wolverhampton City Centre and Cannock Town Centre.
- 3.4 A desktop search of planning designations has been undertaken to inform this paper. Information has been sourced utilising the Multi Agency Geographic Information System ('MAGIC' GIS) and the Unitary Development Plan (UDP) and Wolverhampton Proposals Map.

- 3.5 The findings have outlined that a large portion of the site is located within the Wolverhampton City Centre Boundary. The northern corner of the site falls just outside (illustrated below).



(Unitary Development Plan (UDP) and Wolverhampton Proposals Map)

- 3.6 The site is also located within a Green Belt designation.
- 3.7 Environment Agency Flood Risk mapping for land-use planning, indicates that the site is located in a Flood Risk Zone 1. This indicates that the site has a low probability of flooding (less than 1 in 1,000 annual probability of river flooding).
- 3.8 We consider that the above information demonstrates that proposed site is sustainably located and will therefore meet the 'golden thread' running through the National Planning Policy Framework.
- 3.9 The subject site would offer a sustainable urban extension and is promoted as a suitable, deliverable and an available site, subject to its release from the Green Belt.

4. CONCLUSION

- 4.1 Bruton Knowles would like to consider that the scale of the housing required in the Black Country, along with the lack of sufficient land available, means that 'exceptional circumstances' exist to justify that Green Belt land should be released for housing.
- 4.2 The subject site has no physical constraints and is sustainably located on the outskirts of the existing urban area of Wolverhampton. And subject to the site's release from the Green Belt it would offer a deliverable and an available site that should be allocated for housing development.