

24/00793/OUTM| Outline planning application (with all matters reserved except primary means of vehicular access from Pendeford Mill Lane, Lane Green Road, and Barnhurst Lane) for the demolition of existing buildings, construction of up to 750 dwellings, a First School, up to 75 units of specialist older persons accommodation and a Local Centre (up to 1,000sqm of commercial/community floorspace including up to 500sqm of retail provision), as well as associated access, drainage, green and blue infrastructure, ground remodelling and ancillary infrastructure.

1. Representations of CPRE Staffordshire, the countryside charity.

1.1. We acknowledge that the site has been identified as a strategic location for development within the South Staffordshire Publication Plan (Regulation 19) of April 2024. However, under the Core Strategy (Core Policy 2), this site remains designated Green Belt land. Given the current stage of the Local Plan process, we consider this proposal **premature**. As such, we believe the decision should be deferred until the conclusion of the Planning Inspectorate's examination of the new Local Plan.

2. Current Green Belt Status and Core Strategy Policy GB1

2.1. According to the Council's Core Strategy (Core 2), the site in question is designated as Green Belt. Policy GB1 in the Core Strategy provides stringent protections for such land, stating:

“Within the South Staffordshire portion of the West Midlands Green Belt as defined on the Policies Map, development acceptable within the terms of national planning policy set out in the NPPF will normally be permitted where the proposed development is for either:

***A.** A new or extended building, provided it is for:*

a) purposes directly related to agriculture or forestry; or

b) appropriate small-scale facilities for outdoor sport or recreation, nature conservation, cemeteries and for other uses of land which preserve the openness of the Green Belt and which do not conflict with its purposes; or

c) affordable housing where there is a proven local need in accordance with Policy H2; or

d) limited infilling and limited extension(s), alteration or replacement of an existing building where the extension(s) or alterations are not disproportionate to the size of the original building, and in the case of a replacement building the new building is not materially larger than the building it replaces. Guidance in these matters will be contained in the Green Belt and Open Countryside Supplementary Planning Document (SPD).”*

2.2. The protection of the Green Belt has been a constant important element from the very first NPPF, as it was in its predecessor policies. Current policy states:



142. *The Government attaches great importance to Green Belts. 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;*

145. *Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. 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. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.*

3. Housing Land Supply and Affordable Housing

3.1. We recognise that this proposal seeks to meet housing needs, including the provision of affordable housing.

3.2. According to the Publication Plan (Regulation 2019) of April 2024, site 519 (Appendix B):

“5.39 *Housing growth in this part of the district will be largely focused on Codsall/Bilbrook. Increased allocations around the village will deliver housing growth alongside a mix of other uses, including a new first school, local retail, and strategic green infrastructure. This recognises the recommendations for proportionate dispersal around Codsall/Bilbrook in the GBBCHMA Strategic Growth Study and the greater level of services and facilities in this area compared to other villages in the district, including access to two railway stations. The level of growth to be delivered is also aligned to the level of growth advised by the Education Authority to deliver an appropriately sized First School in this location whilst avoiding creating capacity issues at the Middle and High School level. It also offers opportunities to deliver additional station car parking at Codsall” and*

Policy SA1 – Strategic development location: Land East of Bilbrook

“Land East of Bilbrook A strategic site for major housing growth is identified at Land East of Bilbrook in the location shown in Appendix B of this document. The key spatial principles for delivering this level of housing growth at Land East of Bilbrook are illustrated through the indicative Concept Plan for the site shown in Appendix F. The development should be delivered in accordance with the requirements of other policies in this Local Plan and an approved site wide Strategic Master Plan as required under Policy MA1, informed by the Concept Plan, vision and objectives for the site contained within this document and requirements set out within the Infrastructure Delivery Plan. The site-specific requirements should include:



- a) A minimum of 750 new homes, including affordable housing and a specialist elderly housing element (e.g. sheltered or extra care) of at least 40 units in accordance with other policies within the local plan; b)*
- b) A Community Hub focused around a central area of communal green space, well connected to the site wide green infrastructure network, to contain:*
 - *Small local convenience retail to serve the day-to-day needs of the neighbourhood*
 - *Flexible community space*
 - *A new first school (1.3ha)*
- c) Vehicular accesses onto Pendeford Mill Lane, Lane Green Road and Barnhurst Lane and appropriate public transport provision to support sustainable travel from the scheme;*
- d) High quality active travel links through and beyond the site, including to the recreational green space to the north, local shops and rail station in Bilbrook and the Sustrans network to the east;*
- e) An integrated and connected network of accessible green and blue infrastructure informed by the indicative layout on the Concept Plan, in accordance with the most up-to-date evidence and standards and informed by engagement with the local community/Parish Council, providing for high-quality Sustainable Drainage Systems, open space, play, biodiversity net gain, and active travel, including a large central green space at the heart of the development and additional compensatory Green Belt improvements on the land identified as off-site green infrastructure to the south of the site in accordance with Policy DS2;*
- f) Enhancement of and provision of additional playing pitches and associated facilities in the existing recreational open space to the north of Pendeford Mill Lane, including improved active travel links from the new neighbourhood;*
- g) Any necessary historic environment mitigation for the site, as identified in the council's Historic Environment Site Assessment Stage 2 (2022), including setting back development from the site's eastern edge and reinforcing planting within that boundary and any mitigation required as a result of archaeological investigations;*
- h) Necessary contributions towards offsite infrastructure, including highways and active travel mitigation measures, education, leisure, and health provision;*
- i) Development of the site should be in accordance with the recommendations set out in the Level 2 Strategic Flood Risk Assessment detailed site summary table and should provide a site-specific Flood Risk Assessment which shows development laid out as to avoid the floodplain and finished floor levels 600mm above the 1 in 100 plus climate change flood level; and*
- j) Consideration of potential amenity issues and any mitigation requirements as a result of proximity to existing commercial units to the east of the site.”*

3.3. The developer has considered affordable housing requirements and committed to a 40% affordable housing provision within the proposal.

4. Infrastructure Provision and Sustainability

4.1. The proposal includes key infrastructure such as a First School and local community facilities, which is crucial for creating a sustainable and balanced community.

4.2. While we welcome the inclusion of these facilities, infrastructure provision must be considered as part of a holistic and coordinated strategy. Approving this application now may result in unplanned infrastructure delivery that could strain existing local services.

5. Green and Blue Infrastructure

5.1. The proposals for green and blue infrastructure, on-site biodiversity enhancements, and long-term management to achieve at least a 10% net gain in biodiversity are commendable and align with sustainable development principles. The NPPF states:

180. Planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures

5.2. However, we believe that the provision of green and blue infrastructure must be thoroughly assessed in the context of the wider Council's Local Plan objectives, ensuring that the development delivers genuine net gains for biodiversity and sustainability.

6. Conclusion

6.1. While CPRE South Staffordshire acknowledges the site's strategic importance under Policy SA1 of the Publication Plan, we believe this application is premature.

6.2. The site is currently designated as a Green Belt in the Adopted Local Plan, and the exceptional circumstances for its release have yet to be fully justified.

6.3. Similarly, we question the assertion made in the developer's Planning Statement that unmet housing needs constitute the very special circumstances that justify Green Belt release. South Staffordshire Council has a history of over-supply and has regularly exceeded its housing requirements. Please see CPRE's [recent review of housing evidence](#) for the 2024 South Staffordshire Plan for further details.

6.4. At this stage, we cannot either support or object to this application, as we await the outcome of the new Local Plan examination. We, therefore, urge the local authority to defer any decision on this application until the Planning Inspectorate has concluded its examination, ensuring that the development proceeds in alignment with the district's housing, infrastructure, and environmental strategies.

6.5. Please note that our comments relate primarily to planning issues. We recognise that other organisations and individuals have raised valid concerns regarding issues



such as highways, the lack of public transport, the loss of productive agricultural land, as well as negative impacts on the landscape, ecology and biodiversity. We hope that these matters will also be considered when making a decision on the application.