

BOBBINGTON PARISH COUNCIL

SOUTH STAFFORDSHIRE

Clerk to the Council
Mrs. V S Morris
Tel 07973 759723
E-mail clerk@bobbington.staffslc.gov.uk

29 Six Ashes Road
Bobbington
Near Stourbridge
South Staffordshire
DY7 5BZ

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Dear Sirs,

Planning Application 20/00893/OUT – Halfpenny Green Airport

Mixed use development comprising the erection of three new hangar buildings, the refurbishment of existing airport infrastructure, the provision of new hard standing for external plane and fuel tanker parking, additional grassed informal plane parking; the demolition of up to 7 existing single storey commercial / retail buildings and the erection of new / replacement commercial / retail / community and, the erection of 112 dwellings as enabling development (all matters apart from access reserved).

The South Staffordshire Local Plan together with the NPPF 2019 form the statutory development plan for the area. Section 38 of the Planning and Compulsory Purchase Act requires determination of Planning Applications to be made in accordance with the development plan, unless material considerations indicate otherwise.

Bobbington Parish Council **OBJECT** in principle to this Planning Application on the basis that it does not comply with National or Local Planning Regulations in a number of key areas or meet Strategic Objective 1 of the South Staffordshire Core Strategy (December 2012).

“Protect and maintain the Green Belt and Open Countryside in order to sustain the distinctive character of South Staffordshire”

Our observations and objections to the proposals based on material considerations are as set out below:

1. Green Belt

The Planning Application does not conform to Green Belt Policy as set out in GB1 of the South Staffordshire Local Plan, or National Policy as detailed in the NPPF 2019, Section 13, paragraphs 143 – 145

“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances” (NPPF Section 13, P.14)

The airfield is situated in the Green Belt and there are no very special circumstances that justify the building of 112 houses, a scheme that would collectively create a development approximately the same in size as the area which currently contains built development.

The development claims to be an enabler for investment in the airfield, but the business case and associated documents have inconsistencies and make no convincing argument that the development would deliver the level of investment required. In fact the Residential Viability Report concludes that viability is an issue and that the projected revenue generated from the housing is overly optimistic. Even

with no affordable housing included in the project, the subsidy available for the further investment in the airfield amounts to only 33% of the projected capital cost of £16.7m. In reality 112 houses is the minimum number required and it is likely that further applications for housing would follow to meet the short fall in investment capital.

Our **OBJECTIONS** to the development are,

1.1.1. The density of the development of 112 homes and the erection of 3 large hangars will have an impact on the openness of the Green Belt. Presently you can see across the site from several viewpoints around the airfield and this would be compromised.

1.1.2. There is no defensible boundary around the housing development to stop the incremental increase of more market housing on the airfield in the future.

1.1.3. The development is outside of the development boundary of Bobbington and isolated from the existing village settlement. Core Policy 5 of the Local Plan states that

“New facilities and infrastructure, of an appropriate scale, must be located and designed so that they are integrated, accessible and compatible with the character, local distinctiveness and needs of the local community”.

2. Housing Needs within the Settlement Hierarchy

In the South Staffordshire Core Strategy, Core Policy 1, Bobbington is defined as a small service village

“where very limited development may be acceptable for the provision of rural affordable housing where it clearly supports a local need and contributes to the sustainability of those local communities. Employment development will be limited to rural employment and diversification which meets local business and community needs”.

In the Local Plan Review of 2018 the Council when re-assessing access to local services, transport links, jobs, retail, hospitals etc., concluded that Bobbington was Tier 4 and Halfpenny Green on the other side of the airfield, Tier 5. This designation defines the settlements as having the poorest access to local services and therefore not suitable for large scale development. The NPPF Section 5, paragraph 77 articulates the need for development to be aligned with local needs, saying

“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs”

The housing development is not compatible with the local area and we **OBJECT** on the grounds that:

2.1.1. There is no requirement for an additional 112 properties and there are no local services to support a development of this size. A housing needs survey conducted by the Parish Council in 2020 identified a need for eight affordable homes only.

2.1.2. The scale of the development is disproportionate to the size of the existing village.

2.1.3. The housing development will function as a self-contained settlement and its isolation will not create a cohesive social community with the existing village.

2.1.4. The proposed housing mix does not reflect the local need in the Strategic Market Housing Assessment (SMHA).

2.1.5. Policy H2 requires a contribution of 30% affordable housing contribution and the proposal contains only a 10% contribution.

2.1.6. The development would change the rural character of Bobbington.

2.1.7. There is no public transport, but a reliance on cars to travel to the local towns of Wombourne and Bridgnorth for shopping, schools, healthcare and leisure facilities etc.

3. Noise and Public Safety

“Noise sensitive developments such as housing development will not be permitted in the vicinity of established noise generating uses where potential for harmful noise levels is known to exist unless measures to suppress noise sources can be provided through condition or legal agreement”.

From a noise and safety perspective we **OBJECT** to the housing on the basis that,

3.1.1. The residential development is situated close to the re-fuelling area on the airfield and this may pose a danger should there be a fire and residents need to be evacuated.

3.1.2. The noise levels originating from the nearby Rotor Village and from the MoD Chinooks that land for refuelling, will negatively impact on the lives of residents in the new housing development. Policy EQ9 states that,

4. Sustainable Transport and Road Safety Issues

As noted above, there is no public transport serving Bobbington. The Sustainable Development SPD 2018 clearly indicates that

“Any new development in South Staffordshire must also be well connected via public transport from the outset. Developers should seek to provide direct connections to key destinations such as village centres, major employment and leisure zones. To encourage a reduction in car use, public transport will need to be frequent, reliable and easily accessible”.

The provision of public transport and its importance in contributing to the sustainability of any new development is also articulated in the NPPF Section 9, Paragraphs 108 and 110,

“a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users; and

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree”.

d) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use”

The recommendations made in the Transport Assessment plan fail to address the fundamental issues of providing a sustainable travel plan and provide no realistic alternatives to that of using cars for daily commuting. Based on the lack of a sustainable travel plan, we **OBJECT** to the proposals as set out below,

- 4.1.1. With no public transport links there will inevitably be an increase in traffic, putting pressure on the local road network that is made up of C roads and unclassified country lanes. The Transport Plan recommends localised carriageway widening on Crab Lane, but no such measures are suggested for the wider network of country lanes that share the same narrow characteristics and feed traffic to and from Crab Lane and Gospel Ash Road.
- 4.1.2. Transport remains one of the largest emitting sectors of greenhouse gases (Source, Dept for Transport – Transport Statistics GB 2019) and the additional traffic will inevitably increase the carbon footprint. This is contrary to Government Policy of creating a carbon neutral economy in the UK.
- 4.1.3. The trip distribution of future residents and trips related to the commercial uses at the site has been calculated using 2011 Journey to Work (JTW) Census data. This information is ten years old and is out of date. The Department for Transport Report, Transport Statistics Great Britain 2019, show that 68% of workers typically travel to work by car and for the Midlands region this number rises to 80%. According to the RAC Foundation, since 2012 the average growth in cars has been around 600,000 per year and in a rural village the percentage of households having two or more cars is almost 60%. These recent figures casts doubt on the reliability of the traffic flow information provided.
- 4.1.4. The Transport Assessment does not take account of the agricultural vehicles that use Crab Lane and other roads around the airport. The airfield is surrounded by arable land and the vehicles that are used for farming are large and often fill the width of the carriageway. It should also be noted that the proposed entrance to the residential development is opposite a farm yard, where livestock is regularly moved in an out on large two/three deck cattle trailers.
- 4.1.5. The Transport Plan recommends the use of traffic calming measures in Crab Lane. Any traffic calming scheme would need to be appropriate in accommodating the large agricultural vehicles traffic that use the road.
- 4.1.6. It is recommended that Crab Lane is designated as a Quiet Lane, appropriate for shared use by walkers and cyclists etc. However the ATC survey indicates that the annual average daily traffic (AADT) flow on Crab Lane is 1,122 vehicles, before development of the site. This would indicate that Crab Lane would fail to meet the test of a maximum of 1,000 vehicles in order to achieve this status.
- 4.1.7. The Staffordshire Connect Bus does not currently service Bobbington and should the route be expanded to do so, it would be totally inadequate in providing the frequent and reliable transport service that is required for the daily commute to work, schools, shops and health facilities in neighbouring towns.

- 4.1.8. There are no pedestrian pavements to connect the airfield and residential development in Crab Lane to Bobbington Village, or to the other surrounding villages and towns. This presents a safety issue, particularly for those children and parents that may want to walk to the primary school in the village.
- 4.1.9. There is no street lighting in either Crab Lane or Six Ashes Road until you reach the primary School. In the winter months this would create a hazard for both pedestrian and motorists alike, with walkers on the highway after dusk.
- 4.1.10. There are no safe or well-lit cycling routes to neighbouring towns.

5. Environmental Issues

The airfield is near to Highgate Common, an area that is designated as a Site of Special Scientific Interest (SSSI). It has been estimated that 140 different types of solitary bee and wasp live on the Common. Some of the bees and wasps living on Highgate are extremely rare in the UK. <https://www.staffs-wildlife.org.uk/nature-reserves/highgate-common>. <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S2000525&SiteName=Highgate%20common&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=> The NPPF 2019 Section 15, paragraph 171b states,

“Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted”

We **OBJECT** on the basis that the increased volume of traffic, both during the construction phase and subsequent years, will have a negative impact on the fragility of this eco system.

6. Heritage Asset

Halfpenny Green Airport is not currently listed as a Heritage site, but it has some historical significance to the local area and nationally. The original airfield, known as RAF Bobbington, was used by the RAF during World War 2 as an Air Observer and Navigator School. With the recent surge in interest around the part played by the RAF during the Battle of Britain, efforts should be made to preserve the history of the airfield for future generations. The NPPF Section 16, paragraph 184 states that consideration should be given to buildings of local historic value,

“These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of existing and future generations”

Some of the original RAF buildings from the 1940s still stand today, although in state of disrepair. Under the existing proposals most of these are being demolished to make way for a new retail complex and market housing. To preserve the historical value of the site, some of these building could be retained and refurbished to retain the character of the airfield. This is particularly true of those buildings around the entrance to the site and the control tower.

6.1 We **OBJECT** to the demolition of all 1940s buildings would ask the Council to consider the listing of some of these buildings to ensure their survival.

7. Commercial and Retail Development

As part of the airfield development the proposals include replacement of existing dilapidated commercial units and a new build of commercial units, creating an additional 1787m² of space. This more than doubles the current commercial capacity which is approximately 927.12m². Core Policy 12 of the Local Plan, monitored through Policies EV13-EV14 shows that

“The Council will support development proposals directly related to the General Aviation role of the Airport within the developed area of the site defined on the Policies Map and as set out in Policy EV11. The Council will also support the continued occupation of the site by existing non-aviation businesses that play an important role in ensuring its viability and providing employment for the local rural community”

Whilst it is acknowledged that there is already some non-aviation commercial activity on the airfield and this is key in ensuring the viability of the airfield, the proposed expansion of commercial/retail buildings substantially increases the existing commercial space. The Sequential Assessment looked at six settlements close to Bobbington to investigate whether any sequential preferable sites were available which could accommodate the office development proposed at the airport. The conclusion was that there were none. However, the report failed to identify commercial premises at Wombourne Enterprise Park, or Heathmill Enterprise Centre in Wombourne. Neither did it consider the alternatives available just across the border in Dudley, of Kingswinford Trading Estate and Dawley Brook Estate in Kingswinford. These are all much better connected to public transport routes and are in walking distance of the town’s facilities.

Bobbington Parish Council are mindful that the airport needs income in order to remain viable and that this may not be provided solely through its aviation activity. The existing non-aviation commercial activity makes some contribution, but more may be required in order for it to survive for the benefit of the airfield users.

- 7.1 Therefore although the Parish Council **OBJECT** to the proposals as presented and in particular the housing development, they **MAY SUPPORT** some limited expansion of commercial/retail operations. This would need to be regulated through the Planning Process to ensure that it does not grow exponentially to compromise the Green Belt and that the business activity poses no nuisance to residents, or to the users of the airfield, i.e., the flying activity.

8. Summary

In summary, at the heart of the NPPF is a presumption in favour of sustainable development that balances the needs of the environment, social community and local economy. The proposed developments fail to deliver on this sustainable agenda. Core Policy 12 of the Local Plan covering Wolverhampton (Halfpenny Green) Airport shows that “

“The Council will resist development proposals that are not permitted development that would have a detrimental impact on the environment and nearby residents”

Clearly these proposed developments will have a huge detrimental impact on the environment and nearby residents and in doing so will still not achieve the level of investment required to carry out the airport refurbishments as planned. Alternative options for revitalising the airport other than that of housing should be investigated by Liliactame and so we urge the Council to reject this Planning Application.

Yours faithfully,

Victoria Morris

Clerk to the Council