

SOUTH STAFFORDSHIRE LOCAL PLAN 2018-39 PUBLICATION PLAN

LAND AT CROSS GREEN

SUBMITTED ON BEHALF OF TAYLOR WIMPEY UK LTD



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1. Introduction

- 1.1 This representation, submitted on behalf of Taylor Wimpey UK Ltd, responds to the Regulation 19 'Publication Plan' consultation document and accompanying published evidence, having regard to the national and local planning policy context. It relates specifically to Land at Cross Green where Taylor Wimpey has secured land interests. A site location plan is attached at **Appendix 1**.
- 1.2 The representations are framed in the context of the requirements of Local Plans to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Development Plan to be sound it must be:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – deliverable over the Plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.
- 1.3 These representations also give consideration to the legal and procedural requirements associated with the plan-making process.
- 1.4 Chapter 3 of these representations provides comment in respect of the proposed spatial development strategy, Chapter 4 provides support for the Strategic Development Location at Cross Green, Chapters 5 – 11 provides Taylor Wimpey's views on the proposed theme based policies and Chapter 12 provides an overview of the proposal and consideration of the Council's site selection process.

2. Planning Policy Context

2.1 Taylor Wimpey supports South Staffordshire District Council in progressing with a review of the South Staffordshire District Plan as required by Policy SAD1. This provides the opportunity for the Council to comprehensively review the following matters:

- South Staffordshire's own objectively assessed housing need and the potential for housing supply within the District (including existing safeguarded land identified through the Site Allocations Document) to meet this need.
- The potential role of housing supply options within the District to meet unmet cross boundary needs from the wider Greater Birmingham Housing Market Area (GBHMA), including from the Black Country.
- Employment land requirements for South Staffordshire
- South Staffordshire's potential role in meeting wider unmet employment needs through the Duty to Co-operate.
- The appropriateness of the existing settlement hierarchy and the strategic distribution of growth in light of new housing and employment needs.
- The need for further additional safeguarded housing and employment land for longer term development needs, and the role of safeguarded land in meeting housing shortfalls across the GBHMA, including South Staffordshire's own needs.
- Gypsy, Traveller and Travelling Showpeople provision.
- A comprehensive Green Belt Review undertaken jointly with the Black Country authorities, to inform any further Green Belt release to accommodate new development within the District.

2.2 The National Planning Policy Framework (NPPF 2021) requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years.

2.3 Taylor Wimpey supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists with the District to guide growth to 2039 and to ensure that development is genuinely plan-led.

- 2.4 The Preferred Options consultation document follows the identification of the Council's preferred spatial housing strategy in October 2019 and preferred allocations and policy directions in November 2021, which identified a proposed approach to delivering infrastructure-led development in line with settlement hierarchy and larger urban extensions focused to the north of the Black Country conurbation.
- 2.5 The Publication Plan identifies proposed site allocations to meet the spatial development strategy, including Land at Cross Green which is included as a proposed Strategic Development Location (Policy SA2).

Evidence Base

- 2.6 The Publication Plan is supported by a broad range of evidence documents to be relied upon by the Council in formulating the Local Plan. Taylor Wimpey supports the identification of the Greater Birmingham HMA Growth Study (2018) and the SHELAA which were absent in the Preferred Options document.
- 2.7 The Greater Birmingham HMA Strategic Growth Study remains the latest comprehensive consideration of housing needs across the Greater Birmingham and Black Country HMA and provides a range of recommended options for meeting these needs, to be tested through individual LPA Local Plan reviews. This evidence has been subject to scrutiny as supporting evidence at the North Warwickshire Local Plan EiP and provides justification for the Council's intended contribution of 4,000 homes to assist in meeting the identified housing shortfall.
- 2.8 Taylor Wimpey has worked collaboratively with the Council, the City of Wolverhampton Council, other key stakeholders and the Council's masterplanning consultant to progress the Strategic Development Location proposal for Cross Green. This has been informed by the preparation of evidence prepared by Taylor Wimpey to supplement the Council's evidence base, including the preparation of an updated Strategic Transport Assessment attached at **Appendix 2**.

Vision & Objectives

- 2.9 The Vision is clear and succinct, however as presently drafted it doesn't appear locally relevant and contains no spatially specific elements.
- 2.10 Taylor Wimpey supports the strategic objectives identified. These are considered succinct, locally relevant and relate to the most important areas of change or protection within the District.

3. Development Strategy

- 3.1 Taylor Wimpey supported Spatial Housing Option G identified through the previous Strategic Housing Strategy and Infrastructure Delivery consultation undertaken in 2019. It is noted the proposed strategy represents a refinement of this option.

Policy DS1: Green Belt

- 3.2 In terms of the strategic approach to the Green Belt there is an acceptance within the Local Plan that there needs to be changes to the Green Belt boundary to accommodate growth requirements within the Plan period. It is agreed that Green Belt release is necessary to deliver a sustainable spatial strategy.
- 3.3 Taylor Wimpey agrees that exceptional circumstances exist for Green Belt release within the District to allow for sustainable development within the plan period.
- 3.4 The Publication Plan recognises that the character of South Staffordshire is directly influenced by the fact that around 80% of the District lies within the West Midlands Green Belt. The rural nature of the District also results in a lack of brownfield opportunities to meet any future housing needs beyond the proposed plan period.

Policy DS2: Green Belt Compensatory Improvements

- 3.5 Taylor Wimpey recognises that the Local Plan should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land as required by para 142 of the NPPF.
- 3.6 The strategic allocation at Cross Green identifies on land adjacent to the Strategic Development Location to provide compensatory improvements. Such improvements will include the provision of public access as part of an overall green infrastructure strategy that will also secure improvements to environmental quality of this land.

Policy DS4: Development Needs

- 3.7 Taylor Wimpey generally supports the policy approach set out in Policy DS4 Development Needs however further commentary is set out below in respect of different components of the housing requirement arrived at.

Local Housing Need

3.8 The Strategic Housing Market Assessment (SHMA) 2021 sets out a minimum housing requirement of 254 dpa based on the Government's standard method, utilising the 2018 Affordability Ratios. Taylor Wimpey welcomes the publication of a SHMA update in October 2022 which reconsiders the minimum housing requirement having regard to the latest Affordability Ratios (2021) which results in a minimum net annual requirement of 241 dwellings.

3.9 The PPG is clear however that the standard method identifies a minimum annual housing need figure and does not produce a housing requirement figure recognising there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

3.10 Paragraph 010 of the PPG (ID: 2a-010-20201216) states:

"Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;"*

3.11 Other circumstances that should be considered in respect of South Staffordshire District include the balance between homes and jobs created over the plan period.

3.12 These circumstances are considered in further detail below.

Unmet Need from Neighbouring Authorities

3.13 The unmet housing need arising from within the wider Greater Birmingham and Black Country Housing Market Area is well documented.

3.14 The Birmingham City shortfall was tested through the BDP EiP and an unmet housing need to 2031 of 37,900 homes was confirmed. Birmingham City Council has now commenced a review of the Birmingham Development Plan, with an Issues and Options consultation recently published. The Issues & Options document recognised that the BDP was unable to identify enough land to meet

all of Birmingham's housing need and there is still a need to work with neighbouring authorities within the Housing Market Area (HMA) to deliver a housing shortfall. Birmingham City Council has identified a shortfall of around 78,415 dwellings following an assessment of potential capacity from all sources. While this figure will be refined through Birmingham's plan making process, the shortfall to 2042 will remain significant.

- 3.15 The Black Country LPAs, were until this Autumn, undertaking a review of the Black Country Plan which is aligned to the timescales of the South Staffordshire Local Plan review. Evidence that informed the emerging Black Country Local Plan includes an urban capacity assessment. The Urban Capacity Review (2019) concludes that the amount of housing need which cannot be accommodated in the Black Country urban areas remains significant, at around 26,920 homes to 2038.
- 3.16 The Draft Black Country Plan 2018-2039, subject to consultation in 2021, identified a shortfall of 28,239 homes to be exported to neighbouring LPAs through the Duty to Co-operate.
- 3.17 The shortfall figures above do not take into consideration the 35% urban uplift introduced in December 2020 which would be applicable to both Birmingham and Wolverhampton.
- 3.18 Whilst the Black Country LPAs have now taken a decision to abort the joint plan-making approach to instead progress separate Local Plans, Taylor Wimpey considers the evidence remains valid and the Draft Black Country Plan reflects the latest published position in respect of the housing shortfall arising within the Black County.
- 3.19 Taylor Wimpey supports the Council's evidence led approach to providing an additional 4,000 homes to assist with meeting the unmet need. The figure of 4,000 appears reasonable and is justified by the Greater Birmingham and Black Country HMA Growth Study which represents shared evidence produced by constituent LPAs within the HMA.

Economic Uplift

- 3.20 The SHMA sets out the broad economic consequences of the projected growth in Chapter 5. This references the Economic Development Needs Assessment 2020-2040 which forecasts an additional 4,824 jobs within the District between 2020 and 2040. This forecast is based upon methodologies of two of three forecasting houses that do not provide the basis to identify significant growth in the transport and storage sector.

- 3.21 The number of jobs likely to be created within South Staffordshire is likely to significantly exceed the 4,824 jobs forecast by virtue of committed development at the West Midlands Interchange (WMI) which will provide significant growth in the transport and storage sector. The WMI itself is projected to create 8,500 jobs of which 40% will be higher skilled and this level of growth would represent 17% of the Stoke-on-Trent and Staffordshire LEP's new jobs target to 2030.
- 3.22 At present the SHMA assumes that the projected growth of the working age population in South Staffordshire will grow by 6,618 people between 2020-2040. Whilst this is in excess of the forecast jobs growth outlined in the EDNA, Taylor Wimpey is concerned that the EDNA fails to realistically consider additional jobs created at WMI. Further consideration should therefore be given to whether the minimum local housing need figure derived from the standard method would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth, even taking into consideration the 4,000 additional homes to meet unmet needs in the wider housing market area.
- 3.23 Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand. This may require an uplift in local housing needs identified.

Policy DS5: The Spatial Strategy to 2039

- 3.24 Taylor Wimpey supports the proposed spatial strategy to 2039 which recognises environmental capacity and seeks to make best use of existing infrastructure whilst recognising opportunities to delivery new infrastructure.

Settlement Hierarchy

- 3.25 Taylor Wimpey supports the settlement hierarchy which considers the relative sustainability of villages within South Staffordshire District. The Tier 1 and Tier 2 settlements identified contain the widest range of services and facilities and by focusing new homes to these settlements would provide an opportunity to increase sustainability and self-containment.
- 3.26 While the Rural Services and Facilities Audit does not consider locations adjacent to other adjacent towns and cities, these locations are recognised as sustainable locations for growth with over 2,800 homes focused to neighbouring towns and cities within the plan period. Land at Cross Green is sustainably located to the north of the conurbation with good links to existing services and facilities and provides an opportunity to support the delivery of a new rail halt and strategic park and ride facility at Brinsford.

Spatial Distribution of Housing Growth

- 3.27 Taylor Wimpey supports the distribution of housing growth through the identification of strategic sites close to the Black Country and proportionate growth focused to the villages, with the most sustainable villages to deliver a higher amount of growth.
- 3.28 Housing growth also appears to be focused to the north of the District which aligns to the location of the Tier 1 settlements and the proposed employment strategy, that seeks to deliver thousands of new jobs in the northern extent of the District, including the freestanding employment site consented at ROF Featherstone which is adjacent to Land at Cross Green and the nearby i54 South Staffordshire. This part of the District is also far more connected to major road and rail infrastructure.
- 3.29 Taylor Wimpey considers that the proposed development strategy not only assists in providing improved infrastructure but also has due regard to where housing needs exist, including within locations close to the Black Country conurbation where a significant shortfall in housing provision has been identified.
- 3.30 This strategy provides the opportunity to ensure that the necessary homes, along with supporting infrastructure, would be delivered in a timely and coordinated manner, to meet both the local needs arising from within the District, alongside those arising from the wider GBBCHMA.

Policy DS6: Longer Term Growth Aspirations for a New Settlement

- 3.31 Taylor Wimpey notes Policy DS6, which recognises the Council's aspiration to explore the potential for a sustainable, independent new settlement.
- 3.32 Policy DS6 recognises that such an option would not contribute to housing growth during the proposed plan period to 2039 which is agreed. A new settlement proposal, even if a suitable and viable option were to be identified, would take a long time to masterplan and deliver and would need to be delivered alongside infrastructure on a scale much larger than a usual development.

4. Site Allocations

- 4.1 Taylor Wimpey has a number of land interests within South Staffordshire District. This representation relates to Land at Cross Green and should be read in conjunction with other representations submitted in respect of the proposed allocations.
- 4.2 Taylor Wimpey recognises the importance of the four proposed strategic housing allocations in delivering the spatial strategy for the District to 2039. Due to the scale of the four sites, Taylor Wimpey supports the inclusion of site-specific policies to establish a vision for each site, alongside a requirement for a detailed masterplan and design code.

Policy SA2: Strategic development location: Land at Cross Green

- 4.3 Taylor Wimpey has worked collaboratively with the Council, the City of Wolverhampton City Council, other stakeholders, infrastructure providers and the Council's masterplanning consultants in developing a shared Vision and set of Objectives for the new Cross Green community. This process has been informed by the preparation of a range of site-specific technical documents prepared by Taylor Wimpey and evidence produced by the Council.
- 4.4 Taylor Wimpey supports this Vision, Objectives and the resultant indicative Concept Plan contained within the Publication Plan. This will form the basis of further technical work and the preparation of a comprehensive masterplan and design code to inform a future planning application.
- 4.5 The emerging proposal for Cross Green and a summary of technical work undertaken to date is set out in a Vision Document, attached to this representation at **Appendix 3**.
- 4.6 An updated Strategic Transport Assessment (STA) has also been provided at **Appendix 2** to address the appropriate initial comments to the original STA provided by Taylor Wimpey and included as part of the Council's evidence base.
- 4.7 Taylor Wimpey supports the proposed identification of Strategic Development Location and has a freehold land interest in the site at Cross Green and further land interests at Land North of Linthouse Lane.
- 4.8 In respect of Land at Cross Green, the proposed strategic housing allocation, provides an opportunity to deliver approximately 1,200 dwellings alongside new infrastructure as identified in Policy SA2.

- 4.9 The key infrastructure and design requirements set out in Policy SA2 are supported by Taylor Wimpey however, it should be recognised that only land within the control of Taylor Wimpey can be safeguarded to provide opportunity for a future rail-based park and ride.
- 4.10 Taylor Wimpey's land interests relate to the proposed Cross Green allocation, with the majority of the site under freehold ownership, providing confidence that a comprehensive and co-ordinated approach to development can be achieved in its delivery.
- 4.11 Taylor Wimpey can demonstrate the site is available, suitable and viable, with further information provided within Chapter 12 of this representation and accompanying Development Vision document.
- 4.12 In light of the required Strategic Masterplanning process progressing it is requested that Policy SA2 refers to the delivery of approximately 1,200 homes rather than specifying this as a minimum requirement. The appropriate number of homes to be delivered and density achieved on site will be considered further through the required masterplanning process outlined within the Local Plan.

Policy MA1: Masterplanning Strategic Sites

- 4.13 Taylor Wimpey supports the Council's masterplanning approach to ensure high quality design. Taylor Wimpey confirms that a comprehensive and deliverable site-wide Strategic Master Plan will be prepared in respect of the Strategic Development Location at Cross Green. This will be prepared in conjunction with the Council and informed through pre-application discussions.
- 4.14 Taylor Wimpey welcomes the removal of the requirement for a Supplementary Planning Document for Linthouse Lane set out in the Preferred Options document. Such a document would be superfluous given the commitment in the Local Plan to develop a Strategic Master Plan and design code for the site as described below in accordance with Policy MA1.
- 4.15 It is the intention of Taylor Wimpey to prepare this site-wide Strategic Master Plan to inform a future planning application, recognising that this Masterplan will be adopted prior to the determination of any planning application.
- 4.16 The Strategic Master Plan will be prepared having regard to the requirements established through SA2 and the suite of proposed development management policies. In addition, the preparation of a masterplan and design code will provide opportunity for a collaborative approach including engagement with the local community and key stakeholders. Engagement with key infrastructure

providers through the Local Plan review process should result in refinement of the Infrastructure Delivery Plan (IDP) with the identification of infrastructure requirements, costs and phasing of delivery.

Other Proposed Housing Allocations

- 4.17 This representation relates to Land at Cross Green. Further comments in respect of the proposed housing allocations contained in Policy SA3 and SA5 are set out in other representations submitted on behalf of Taylor Wimpey.

5. Delivering the Right Homes

HC1: Housing Mix

- 5.1 The policy requires a flexible approach, recognising that the size and type of housing will change over the plan period and may be different across the District.
- 5.2 Taylor Wimpey considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs. The assessment of needs should be routinely updated across the 20-year Plan period. This ensures that housing mix is reflective of market-driven need.
- 5.3 Taylor Wimpey would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 70% of properties to comprise three bedrooms or less.
- 5.4 The SHMA utilises a long-term balancing housing market (LTBHM) model to determine future demand for housing. Taylor Wimpey would question whether this model does actually determine demand rather than need. The demand is often for a larger open market property than a household may need to provide additional flexibility e.g. working from home. Therefore, the approach to capping the percentage of larger homes, particularly open market homes, fails to provide a good level of flexibility to allow for changing market signals across the plan period or to address varying needs in different locations within the District.

HC2: Housing Density

- 5.5 Taylor Wimpey supports the efficient use of land, in accordance with National Planning Policy and Guidance, and supports the flexibility provided by Policy HC2 to allow sites to be considered on a site-by-site basis, having regard to the prevailing local character, context and other planning policy requirements or opportunities for supporting infrastructure.
- 5.6 Due to the size of the site at Land at Cross Green and the lack of identified constraints, it is realistic to expect the delivery of an efficient scheme that could achieve a minimum average net density of 35-40dph. However, this would be achieved through the provision of character areas of varying densities and would be reflective of the character of surrounding development, including higher density development close to centrally located community facilities.

HC3: Affordable Housing

- 5.7 Taylor Wimpey notes that for all major developments 30% of all homes are to be delivered as affordable housing. This appears to be broadly supported by the

2021 Stage 1 Viability Study which determined the current affordable housing requirement of 40% affordable provision is very unlikely to prove supportable on larger schemes with significant infrastructure costs. The Stage 1 Viability Study confirmed that affordable housing within the range of 20-30% is potentially relevant to strategic housing sites overall, assuming a maximum of £9,200/dwelling S106 costs and no additional CIL contribution.

- 5.8 It is recognised that a Stage 2 Viability Assessment builds upon the Stage 1 findings and includes updated assumptions on development costs and values, including a review of the four strategic sites. For Cross Green the appraisal appears to assume approximately £11,000/dwelling S106 costs and no additional CIL contribution, although this is not clear within the site appraisals. Taylor Wimpey recognises that S106 costs will be subject to change at the planning application stage.
- 5.9 Viability is dynamic and the Council's evidence relates to a snapshot in time. Therefore, Taylor Wimpey supports the mechanism within Policy HC3 to submit a viability assessment at the application stage if it can be demonstrated that circumstances have changed. Such circumstances should include increasing infrastructure costs or changes to house prices or build costs.
- 5.10 The policy refers to further guidance being provided by the Affordable Housing SPD is noted. The SPD is not the appropriate approach for setting new policy and or burdens on delivery, and the Local Plan should provide clarity at the point of adoption as to what is required to be delivered.

HC4: Homes for Older People

- 5.11 The proposed policy requires a range of specialist housing to be delivered on site, both within market and affordable sectors. It is not clear whether this is a continuation of the Council's current approach of requiring 10% of all homes to be delivered as bungalows or other ground floor accommodation.
- 5.12 It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 100% of all homes to meet optional M4(2) requirements. M4(2) dwellings are described as making:

“reasonable provision for most people to access the dwelling and incorporate features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users.”

- 5.13 The Strategic Housing Market Assessment 2022 (SHMA) includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing and technical standards.
- 5.14 The SHMA concludes that, in general, South Staffordshire District has an older age structure (in terms of older people) compared with the wider region and nationally. It is recognised that the older person population is likely to increase over the plan period, however an ageing population affects the whole country and is not an issue specific to South Staffordshire. The Government has consulted on raising accessibility standards for new homes but the requirement for all homes to meet M4(2) standards is yet to be mandated. If the Council intends to pursue a policy in respect of M4(2) standards this must be evidenced.
- 5.15 The SHMA published in 2021 identified a need for 1,793 accessible and adaptable general homes for those over 65 and 1,235 for those under 65 to 2038. The latest SHMA (2022) increases this identified need to 2,172 accessible and adoptable general homes for those over 65 and 851 for those under 65 to 2040. It is not clear why these figures have altered so significantly in such a short space of time. However, the need equates to less than 30% of the planned housing supply to 2039. Taylor Wimpey considers that whilst there may be justification for implementing optional M4(2) standards, the 100% requirement is not justified. The Policy should be amended to require a maximum of 30% of all new homes to be delivered to meet the optional M4(2) standards, especially where this could be in addition to other homes for older people and others with special housing requirements required by Policy HC4.

HC8: Self & Custom Build Housing

- 5.16 National Planning Policy Guidance notes a responsibility for 'relevant authorities' to maintain a self-build and custom housebuilding register. In understanding the need for self and custom build the PPG recognises the role of the Strategic Housing Market Assessment in understanding the size, type and tenure of housing needed for different groups including people wishing to self-build or custom build their own homes.
- 5.17 The 2022 SHMA identifies 30 applicants on the self-build register as of Spring 2022, recognising that 10 of these applicants are also on a register within another LPA. This demonstrates a very low level of demand.
- 5.18 Taylor Wimpey considers Policy HC8 provides a justified and proportionate approach to meeting this specific need, which requires the consideration of the

Council's Self Build Register on major developments but falls short of requiring a specific percentage of provision.

- 5.19 Taylor Wimpey supports the approach that should a proposed custom self-build plot not be sold after 12 months following active marketing, then the developer will be permitted to build out the plan as a standard property type, recognising from experience that many of those who are on the Council's register will not be seeking a plot on a larger housing development.

6. Design & Space Standards

HC10: Design Requirements

- 6.1 Taylor Wimpey supports the introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance.
- 6.2 It should be noted that the proposal at Cross Green has already been subject to significant discussion with stakeholders and further consultation will be undertaken in line with the provisions of Policy MA1 in the preparation of a strategic masterplan.

HC12: Space About Dwellings & Internal Space

- 6.3 Taylor Wimpey has limited comment in respect of the external space standards that reflect existing policy which are generally considered appropriate.
- 6.4 However, if bungalows are to be provided within a scheme, it would seem logical to relax garden sizes or allow for the provision of communal/shared gardens to ensure efficient use of land and to reflect any desire from the market for low-maintenance external amenity areas. This approach is also likely to align to any appropriate space about dwellings requirements which should reduce the necessary distance between principal facing windows for ground floor windows, where intervening boundary treatments would interrupt views.
- 6.5 Taylor Wimpey does currently adhere to the Nationally Described Space Standards (NDSS) through the design of current housetypes.

HC13: Parking Standards

- 6.6 Taylor Wimpey supports the proposed parking standards contained within the Publication Plan.
- 6.7 In respect of EVCPs, The Department of Transport Consultation Response: Electric Vehicle Charging Points (EVCP) in Residential & Non-Residential Buildings dated November 2021 sets out that from 15th June 2022 new dwellings with associated parking within the boundary of the dwelling) will have at least 1 EVCP per dwelling. Therefore, it is no longer necessary for the Council to have a proposed policy requirement for EVCPs.
- 6.8 The EVCP standards set out in Appendix I of the Publication Plan are broadly supported in respect of dwellings where these align to Requirement S1 and Regulation 44D.

6.9 It is noted that the Council's Viability Assessment includes a cost of only £500 per EVCP. This cost is below the Government's cost estimate and excludes any costs for upgrading local networks. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated a cost of £974 per EVCP plus an automatic levy for upgrading networks capped at £3,600. This is not reflected in the Stage 2 Viability Study.

7. Promoting Successful & Sustainable Communities

HC14: Health Infrastructure

- 7.1 Taylor Wimpey recognises the need for development to address unacceptable impact on health infrastructure. At present the policy is restricted to seeking a proportionate financial contribution where it is demonstrated that existing facilities do not have capacity to accommodate patients.
- 7.2 Taylor Wimpey considers this policy should provide additional flexibility by recognising on-site provision of health infrastructure may represent a more appropriate solution to meeting health needs in some circumstances.

HC15: Education

- 7.3 Taylor Wimpey supports Policy HC15 in respect of education infrastructure which appears to represent a continuation of the current approach.
- 7.4 It should be noted the Land at Cross Green is proposing to deliver a new first/primary school to serve the proposed strategic allocation. This is a requirement set out in Policy SA2. The Development Framework Plan for Cross Green identifies a site of 1.6ha to cater for this new facility which is located within the centre of the site, close to other services and facilities proposed, including a local centre and green infrastructure.
- 7.5 It is recommended that engagement with SCC Education informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process. If a First School is required rather than a Primary School, the size of the site necessary to accommodate the school will be less than the 1.6ha identified in Policy SA2. A definitive trigger for requiring the transfer of the land and for the opening of any associated school is also necessary to inform any site phasing plan.

HC17: Open Space

- 7.6 Taylor Wimpey notes the proposed direction of travel in respect of open space which proposes a reduced open space requirement of 0.006ha per dwelling compared with the existing standard of 0.01ha set out within the adopted Site Allocations Document (SAD).
- 7.7 Concern is raised that the emerging requirements appear to provide no flexibility with regards to a site's context. For example, the assumption that all on-site open space should include equipped play provision as a default is

unreasonable where good quality, accessible equipped play is already located within the immediate vicinity of a site.

7.8 Taylor Wimpey wishes to raise concerns that distance/accessibility isochrones are not identified within the policy for different open space typologies such as LEAPs and LAPs to ensure open space infrastructure and are presumably left to a future Open Space, Sport and Recreation SPD. Accessibility standards should be established through the Local Plan to provide certainty and not displaced to supplementary guidance which is not intended to establish policy or create further burdens on development.

7.9 The Development Framework Plan for Cross Green, introduced at **Appendix 3**, demonstrates the delivery of public open space in excess of the 0.006ha requirement and the provision of a range of formal and informal play provision as part of a network of multi-functional green spaces.

HC18: Sports Facilities & Playing Pitches

7.10 Taylor Wimpey notes the Indoor Sports Facilities Strategy and Playing Pitch Assessment/Strategy that forms part of the evidence base for the emerging Local Plan.

7.11 Taylor Wimpey recognises that a financial contribution to sports facilities and playing pitches may be necessary from new major development to meet needs arising from the development where evidence recognises there is a shortfall in capacity to meet the generated demand.

7.12 The policy allows for a financial contribution to improve existing facilities in lieu of new on-site provision where appropriate.

HC19: Green Infrastructure

7.13 Taylor Wimpey supports the policy approach to protecting, maintaining and enhancing where possible a network of interconnected, multi-functional and accessible green and blue spaces

7.14 Taylor Wimpey supports the provision of multi-functional greenspace as part of strategic developments.

7.15 Again, the Development Framework Plan included at **Appendix 3** demonstrates the delivery of multi-functional, interconnected, accessible green and blue spaces as part of the comprehensive proposal for Cross Green.

8. Building a Strong Local Economy

EC3: Inclusive Growth

- 8.1 The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential units is not supported by Taylor Wimpey.
- 8.2 It is not clear how any certainty could be provided through the provision of such a Plan. It should be recognised that the business model employed by Taylor Wimpey and other major housebuilders relies upon subcontractor businesses. It is therefore not considered that this policy is not justified and any outcomes unlikely to be effective.
- 8.3 Despite this, construction stage opportunities in respect of Cross Green include:
- a comprehensive employment, training and skills strategy as part of the construction stage;
 - opportunities to engage with schools and colleges; and
 - Prioritisation of the procurement of materials and labour locally where possible.

9. Community Services, Facilities & Infrastructure

EC8: Retail

- 9.1 Taylor Wimpey notes the reference to a small quantity of retail provision being supported within Policy EC8 at Cross Green to support the existing Retail Centres Hierarchy.
- 9.2 It is intended that retail floorspace will be included within a central village hub as part of a mix of commercial and community facilities.
- 9.3 The Policy is not clear whether the net floorspace thresholds identified within Policy EC8 for the provision of impact assessments will apply to the Strategic Development Locations.

EC11: Infrastructure

- 9.4 Taylor Wimpey supports the Council's proposed infrastructure led strategy which seeks to focus development towards larger and better-connected settlements and where appropriate deliver new infrastructure benefits alongside new development.
- 9.5 Land at Cross Green is a larger strategic proposal that can facilitate significant infrastructure provision. The site can deliver the following emerging infrastructure opportunities identified within the Infrastructure Delivery Plan 2022 (IDP):
- Delivery of a new 1.5 FE Primary School;
 - Convenience retail provision to meet local needs in addition to other commercial/local employment hub/space and flexible community space;
 - Potential contribution towards primary care or on-site provision;
 - Safeguarded land to facilitate the delivery of the long-term aspiration for a rail-based park and ride facility at Brinsford;
 - Expansion of existing or provision of new bus service and improved walking and cycling facilities;
 - Off-site highways mitigation identified informed by a future Transport Assessment;

- Enhancements to the Green Infrastructure Network including the provision of new publicly accessible open space and measures to ensure achievement of biodiversity net gain; and
- Playing pitch provision or contributions towards off-site improvements.

9.6 Taylor Wimpey is committed to engaging with the District Council, and other stakeholders to explore infrastructure requirements to inform future iterations of the Infrastructure Delivery Plan and the emerging proposal for Land at Cross Green. Engagement with key infrastructure providers through the Local Plan review process has taken place through the masterplanning process which has informed the Infrastructure Delivery Plan (IDP) however further engagement is necessary to provide absolute clarity in respect of infrastructure requirements, costs and phasing of delivery. This will inform the strategic masterplan and any associated design code.

9.7 In line with para 122 of The Community Infrastructure Levy Regulations 2010, any financial contributions sought in respect of infrastructure must be:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

10. Protecting & Enhancing the Natural Environment

NB2: Biodiversity

- 10.1 Taylor Wimpey is supportive of the need to address net losses to Biodiversity, through the provision of enhancement to deliver an overall net gain. The Council's policy requirement to deliver 10% Biodiversity Net Gain, reflects that of the Environment Act and is not objected to.

NB3: Cannock Chase SAC

- 10.2 Taylor Wimpey notes further evidence in respect of Cannock Chase SAC, including a review of mitigation measures and visitor survey. This evidence has informed the current mitigation measures as Policy NB3 to address any impact arising from development within a 15km radius of Cannock Chase SAC.

11. Climate Change & Sustainable Development

NB6: Sustainable Construction

- 11.1 Taylor Wimpey fully supports a response to the Council's declared Climate Emergency with proactive sustainable measures.
- 11.2 Point 1 of Policy NB6 relates to residential carbon reduction and water efficiency standards. Whilst Taylor Wimpey supports the Government's proposal to achieve 'Zero Carbon Ready' homes by 2025, this will be achieved through application of low carbon heating and hot water technology and highly insulated fabric building elements i.e. walls/floor/roofs which will in turn reduce the energy demand for the home. In addition, it should be recognised that decarbonisation of the electricity grid will only improve the carbon reduction of a proposed development over time.
- 11.3 The Building Regulations (Part L) has been updated in order to deliver the Government's 'Future Homes Standard' which meant from the 15th of June 2022, homes will achieve a 31% reduction in carbon emissions when compared to previous standards. This is a step towards achieving zero carbon ready homes by 2025.
- 11.4 The Council's proposed approach aims to seek carbon reduction standards above those introduced by the Government in June 2022. Taylor Wimpey does not support this approach as there is no evidence to support the departure from the latest changes to the Building Regulations (Part L).
- 11.5 The Sustainable Construction & Renewable Energy Topic Paper refers to clear evidence and recommendations contained within the Staffordshire Climate Change Study 2020 providing a clear and compelling case for the Local Plan Review to set carbon reduction standards for new buildings that go beyond building regulations and the current trajectory for implementing the Government's Future Homes Standard. Cameron Homes does not accept this view.
- 11.6 The Climate Change Study was published prior to introduction of the latest changes to Part L of the Building Regulations and the Study recognised that its recommendations would be affected by the Government's consultations on the Future Homes Standards. The Study also recognised that any standards established would need to be subject to viability assessment.

- 11.7 The 63% reduction in carbon emissions against Building Regulations Part L sought by Policy NB6 does not appear to be justified by any evidence produced by the Council to support the emerging Local Plan.
- 11.8 In addition, the Stage 2 Viability Assessment assumes sustainable design/construction standards equivalent to Building Regulations which represent a 31% CO² reduction, not a more onerous CO² reduction target. The 63% proposed reduction is therefore not justified by the evidence.
- 11.9 Whilst the Government's response to the FHS (2019 Consultation Changes to Part L and F) states that local planning authorities will retain powers to set local energy efficiency standards for new homes, it also states *"as we move to ever higher levels of energy efficiency standards for new homes with the 2021 Part L uplift and Future Homes Standard, it is less likely that local authorities will need to set local energy efficiency standards in order to achieve our shared net zero goal"*. (MHCLG Summary Response to the FHS (2019 Consultation Changes to Part L and F). The Government's proposals set out in both Part 1 of its Future Home Standards Consultation and the 10 points for a green industrial revolution have set a target for homes to be 'zero carbon ready' from 2025 rather than necessarily achieving 'zero carbon' from 2025.
- 11.10 The requirement for each dwelling to demonstrate at least a 10% improvement on the Part L 2021 Target for Fabric Energy Efficiency also lacks flexibility.
- 11.11 Until the Future Home Standard and the supporting SAP software is finalised (Government due to consult 2023) the industry will be unable to confirm its building specification and carbon reduction over Building Regulations 2013 or 2021 baselines until Future Homes Standard becomes legislation in 2025. Therefore, Taylor Wimpey would recommend this policy provides flexibility to allow developers to utilise the most appropriate technology available at the time. The Government's approach *"remains technology-neutral and designers will retain the flexibility they need to use the materials and technologies that suit the circumstances of a site and their business"*. (MHCLG Summary Response to the FHS (2019 Consultation Changes to Part L and F).
- 11.12 In respect of limb b), Taylor Wimpey, where possible, practicable and viable, supports the use of on-site renewable energy generation and/or connection to near site renewable low carbon networks. The wording should be amended to 'additional on-site renewable energy generation should be provided where possible, practicable and viable' to provide necessary flexibility.
- 11.13 In respect of limb c) this exceeds the proposed Government Future Homes Standard and is not justified.

- 11.14 Concern is also raised in respect of the technical detail raised in Policy NB6, point 3 regarding embodied carbon. Taylor Wimpey recognises the importance of reducing embodied carbon within the development process. However, embodied carbon emissions are unregulated in this Country. Current policy and regulation focus solely on operational energy use, as distinct from embodied carbon. There is no nationally approved regulator or national recognised standard, national planning policy or building regulation requirement to assess and report on embodied carbon emissions or whole life cycle carbon assessments.
- 11.15 In respect of implementing a recognised quality regime that ensures the 'as built' performance matches the calculated design performance, there is no nationally agreed and approved monitoring approach that could be utilised to determine this.
- 11.16 To conclude, whilst Taylor Wimpey supports a response to climate change and a the reduction in carbon emissions, the proposed policy is ambiguous and ineffective without the supportive national guidance, regulation, regulator and agreed monitoring approach and does not provide the flexibility to respond to an unknown future Government regulation. The District's departure from the national standards could have damaging impacts on the market without the support of evidence, and should therefore aim to achieve a nationally shared net zero goal.
- 11.17 In order to make this policy sound, Taylor Wimpey recommends that the more onerous requirements proposed are reduced to reflect the 2022 building regulations (Part L) and the Future Homes Standards.

12. Land at Cross Green

- 12.1 This Chapter sets out a brief description of Land at Cross Green, followed by an assessment of the site against each of the Council's site selection criteria, as defined within the Housing Site Selection Topic Papers 2021 and 2022.
- 12.2 A Development Vision Document has been prepared and is attached at **Appendix 3** to this representation which provides further detail.

Site Description

- 12.3 Taylor Wimpey has current land interests at Cross Green as shown on the Site Location Plan appended to this representation (see **Appendix 1**). The majority of this land interest is within freehold ownership.
- 12.4 The site comprises 64 hectares / 159 acres of agricultural land with a number of sub-dividing hedgerows. It is bound by the M54 and to the south, the West Coast Mainline railway line to the east, Stafford Road (the A449) and the Staffordshire and Worcestershire Canal to the west, with low density residential development and farmland to the north.
- 12.5 Featherstone village and the strategic employment proposal at ROF Featherstone are located to the east of the site, Coven Heath to the west, and Cross Green, Slade Heath and Coven to the north.
- 12.6 The site is dissected by two roads, the first of these being Dark Lane, a single-track carriageway running diagonally north-west to south-east through the centre of the site. This narrow country lane is enclosed by robust hedgerows, which define pastoral fields, giving the route a sunken feeling.
- 12.7 Secondly, Brinsford Lane, a two-lane carriageway runs west to east across the southern portion of the site. Along this lane, there are a small number of wayside dwellings, farmsteads and agricultural infrastructure including storage barns, including Brinsford Farm.
- 12.8 A Development Framework Plan identifies the following key design principles:
- Provision of approximately 1,200 homes;
 - Land to allow for the provision of a 500 space car park to serve the long term aspiration of a new strategic park and ride facility at Brinsford;
 - Provision of Road Option 7 to facilitate access to ROF Featherstone strategic employment site;

- Provision of a primary school (capable of expansion to 2FE) and co-located local village hub, centrally located and close to the potential strategic park and ride facility;
- Provision of approximately 23.79 hectares of green infrastructure, evenly distributed throughout the site, including provision of a central green corridor, new village commons and greenways;
- Provision of a range of recreational and community facilities including a NEAP, LEAPs, natural play, natural play and community allotments;
- Provision of SuDS; and
- Provision of pedestrian and cycle paths to link with existing infrastructure.

12.9 The Development Vision Document prepared by Pegasus provides further detail in respect of the site and is included at **Appendix 3** to this representation.

Sustainability Appraisal (SA) Findings

12.10 The Council's Regulation 19 Sustainability Appraisal (2022) provides an assessment of sites both pre and post mitigation and provides assessment of reasonable alternatives against the SA Objectives.

12.11 It is noted the SA determines the centre of Site 646a/b is located within Flood Zones 2 and 3. A minor negative has therefore been identified against SA Objective 2 (Climate Change Adaption). However, this area of land is excluded from the proposed Strategic Development Allocation (SA2) and is instead identified as Green Infrastructure, to remain within the Green Belt. A further minor negative has been provided in respect of surface water flooding under this SA Objective. This can be addressed through any drainage strategy for the site.

12.12 The SA determines the release of Green Belt land at Site 646a/b would have very high levels of harm to the purpose of the Green Belt if developed. It should be noted the very high harm only relates to Site 646b. This harm rating is disputed by Taylor Wimpey. The methodology in respect of SA Objective 4 is also questioned where 'urbanisation of the countryside' and 'coalescence' are assessed and scored separately to Green Belt harm, despite these matters being a key consideration within the Green Belt study. This has the potential to disproportionately influence the assessment of sites.

12.13 SA Objective 5 (Pollution & Waste) notes that Site 646a/b is located adjacent to the A449 and the west coast mainline. It concludes development of the site could

potentially expose some site end users to higher levels of transport associated air and noise pollution. An Air Quality Constraints Assessment has been undertaken by BWB on behalf of Taylor Wimpey which demonstrates the annual mean NO₂, PM₁₀ and PM_{2.5} concentrations across the Site were predicted to be below the relevant air quality objectives and fall into APEC category A in both the current year (2021) and the anticipated opening year (2025). Annual mean pollutant concentrations in 2025 were predicted to be lower than those predicted in 2021 and therefore, based on the current predicted improvements in pollutant concentrations, it is considered that Site 646a/b is suitable for the proposed use with regard to the current relevant air quality objectives. In addition BWB has undertaken noise and vibration surveys; the results of which have informed the preparation of the Development Framework Plan to ensure the development can offer an appropriate acoustic environment for future residential use.

- 12.14 SA Objective 5 also states that Site 646a/b coincides with a minor watercourse. It should be noted that this minor watercourse falls outside of the proposed strategic housing allocation and within a Green Infrastructure designation.
- 12.15 SA Objective 8 (Health & Wellbeing) assesses the site to be wholly/partly outside the target distance to a GP surgery. The Development Framework Plan identifies a Village Hub which provides opportunity for a range of community services and facilities which could include the provision of a GP surgery subject to further discussion with the ICB.
- 12.16 SA Objective 10 (Transport & Accessibility) assesses the site to be outside the target distance to convenience stores and has been given a minor negative impact. Again, due to the nature of the site, convenience retail can be provided as part of the proposed village hub.
- 12.17 SA Objective 12 (Economy) determines the site is located in an area with 'reasonable' sustainable access to employment opportunities. As the site is located within close proximity of the strategic employment at neighbouring ROF Featherstone and there is a cycle link to i54 and Four Ashes strategic employment sites, it is considered sustainable access to employment opportunities is excellent.
- 12.18 It is noted that the assessment of Policy SA2 seeks to address some of the points raised above.

Sequential Test

12.19 The Council's spatial development strategy identifies an infrastructure led approach to growth. Taylor Wimpey agrees that exceptional circumstances can be demonstrated for the release of Green Belt to ensure the sustainable delivery of growth requirements across the District.

Green Belt Harm

12.20 The Council's Green Belt Study determines the release of Green Belt land at Site 646b would have 'very high levels of harm' to the purpose of the Green Belt if developed and Site 646a 'high levels of harm'.

12.21 Taylor Wimpey has commissioned EDP to undertake a preliminary site-specific Green Belt review of the site. This is contained within the Green Belt Position Paper attached at **Appendix 4**.

12.22 This preliminary review concludes the development of the site will impact on the openness of the Green Belt at a local level however, due to the large scale of the designation, this would not significantly undermine the openness of the wider coverage of the West Midlands Green Belt.

12.23 As a result of the site specific preliminary Green Belt review, it is possible to define how redevelopment could conserve and enhance the landscape, whilst utilising readily available defensible and durable boundaries around which to redefine the Green Belt. The site has the potential to provide permanent, defensible boundaries to maintain a sense of openness in the wider Green Belt area.

12.24 Overall EDP considers that the site could be released for development, without significant harm to the function of the Green Belt north of Wolverhampton, retaining the relative openness and performance of the wider Green Belt within this region of South Staffordshire.

12.25 For all of these reasons, it is considered that the site could reasonably be removed from the Green Belt and developed in accordance with an appropriately design site proposal, which is sensitive and responsive to its environment, without harm to the integrity of the Green Belt overall.

Landscape Sensitivity

12.26 South Staffordshire District Council's Landscape Study (2019) finds that the site has 'moderate' sensitivity in landscape terms.

12.27 Whilst the findings of the Landscape Study are not necessarily disputed by Taylor Wimpey, EDP has been commissioned to prepare a preliminary appraisal

in respect of landscape and visual matters. The findings are contained within a Landscape Position Note contained at **Appendix 5**.

12.28 Overall, the site is considered to have some visual constraints but is generally relatively well enclosed by existing arterial road corridors, a main railway line, as well as residential development and mature landscape features, which substantially filter and screen views to the wider landscape. Consequently, the site is experienced as largely enclosed and the perception of the site is one which is not of such a sizeable area due to the filtering effect of field hedgerow vegetation.

12.29 The following key points on visual amenity were identified:

- The effect of undulating landform, robust hedgerows and mature trees within the site filter and screen the visibility of the site, from within the site. However, there is no public access land, or public access route through the site;
- There is potential for views of the site from the Staffordshire and Worcestershire Canal to the west of the site;
- There is scope for views of the site from travelling around the local minor routes, particularly those running through the site, albeit, these routes have a sunken feeling in places (e.g. Dark Lane); and
- There are existing dwellings adjoining the site or overlooking it from the immediate environment; these are mostly situated to the north-west and centrally along Brinsford Lane.

12.30 Furthermore, the gently undulating landform within the site, and its surrounding context, further restricts views into the site's interior, by not providing landform of a sloping nature for open views or from elevated topography.

12.31 With regards to the planning advice for the 'Settled Plateau Farmland Slopes' Landscape Character Type, the basic concern for the retention of character is the loss of scale and structure due to the decline and fragmentation of elements of tree cover, mostly notably hedgerow trees and the loss of hedgerows.

12.32 The Development Framework Plan demonstrates how the site provides opportunity to retain, enhance and integrate field hedgerows and tree components, and create new tree groups and woodland blocks through the which can be appropriately managed for longevity.

- 12.33 Local topography, off-site and on-site mature trees, hedgerows and woodland are notable features that contribute to the site's containment and can be integrated into the development where they will continue to offer these enhancements to local landscape character and context. As such, clear views towards the site are only really obtainable from a limited number of locations, which, are immediate to the site, or within close range.
- 12.34 With respect to landscape character, the preliminary landscape appraisal concludes the site has limited features of value, with its topography and field pattern and vegetated field boundaries being its most valuable aspect. Its existing boundary and internal vegetation remain intact, filtering and screening views from the wider area. Furthermore, development of the site provides an opportunity to improve the tree stock of the site and to bring all vegetation into long-term management, creating new green infrastructure within the site.
- 12.35 Residential receptors within close range of the site are perhaps the most sensitive receptors, though private views are not protected in policy terms. Residential amenity is protected, however, and, as such, the scheme design can be sensitive to these receptors, buffering neighbouring properties with open space or rear gardens and seeking to provide an attractive, high quality development in architectural terms.

Impact on the Historic Environment

- 12.36 Taylor Wimpey has commissioned EDP to prepare a heritage report, which draws together the available archaeological, historic, topographic and land-use information in order to clarify the heritage significance and archaeological potential of land proposed for development.
- 12.37 The assessment establishes that there are no designated heritage assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Battlefields, Registered Historic Parks or Conservation Areas) within the site, and heritage assets beyond the site will be unaffected by the proposals and have no bearing on the deliverability of the site.
- 12.38 Further assessment will be carried out in respect of the Staffordshire and Worcestershire Canal conservation area and to consider archaeological remains that have not currently been identified.
- 12.39 In summary, the technical work undertaken to date concludes there a no evidence to suggest that the development of this site could not accord with the legislative considerations of the Planning (Listed Buildings and Conservation

Areas Act) 1990, the National Planning Policy Framework and the policies contained within the emerging local plan.

Surface Water Flooding

- 12.40 The site lies within Flood Zone 1 which has the lowest probability of flooding.
- 12.41 The Green Infrastructure designation that crosses the site includes an unnamed tributary of the River Penk. The published Environment Agency flood maps shows surface water flooding (Flood Zones 2 & 3) associated with the tributary although the flood zone extents do not entirely match the geometry of the channel. Therefore, detailed site-specific hydraulic modelling will be undertaken to give a more accurate representation of the floodplain.
- 12.42 There are a number of minor watercourses on site associated with existing field boundaries and will be considered as part of a site wide drainage network.
- 12.43 To mitigate against the potential impact of increased surface water run-off, the masterplan will deliver:
- Sustainable drainage features that will include storage basins and swales across the development.
 - The opening up of the culverted watercourses to reduce chance of blockages in the future.

Highways

- 12.44 Foot and cycle facilities within the vicinity of the site are currently limited; however, there is significant scope to improve connectivity as part of the development proposals and a package of enhancements have been identified as part of the adjacent ROF Featherstone application.
- 12.45 The nearest existing bus services to the site are to the west of the proposed development, accessed from the A449 Stafford Road.
- 12.46 The nearest rail station to the site is Wolverhampton Station located around 7km to the south. The station provides frequent train services to numerous destinations including Stafford, Birmingham, Manchester and London. West Midlands Metro services are also available in Wolverhampton, providing access to/ from the West Midlands conurbation. There is significant scope to improve public transport connectivity as part of the development proposals, which includes the potential for a new parkway station on the adjacent West Coast Mainline which bounds the east of the site.

- 12.47 It is proposed that primary vehicle access to the site be taken from the proposed Road Option 7 to be constructed between the A449 Stafford Road and Cat and Kittens Lane, over the WCML, to facilitate the delivery of the adjacent ROF Featherstone employment proposal.
- 12.48 Secondary points of vehicle access are proposed onto Brinsford Lane and New Road. Separate pedestrian/ cycle access points are also proposed, which will form part of a pedestrian and cycle priority route through the site.
- 12.49 Internally, the site would include a principal spine road in conjunction with a number of primary and secondary streets.
- 12.50 A Transport Assessment will be completed to assess impacts across the wider network, this will include speed survey work. The Transport Assessment will take account of any local committed development sites and any committed highway improvements. Suitable mitigation will be provided as part of the development proposals including any identified off site highway works and contributions. A Strategic Transport Assessment has been provided and is attached at **Appendix 2**.

Impact on Current Land Use

- 12.51 The site currently comprises several parcels of land utilised for agricultural, mainly pastoral, use. There are no Public Rights of Way (PRoW) that cross the site and there are no publicly accessible open spaces or community uses that would be lost as a result on development.
- 12.52 To the contrary, the proposal would deliver new public open space and community facilities that would benefit new residents and the wider community.

Impact on Natural Environment

- 12.53 There are no statutory designated sites of nature conservation value within or immediately adjacent to the site. However, a desk study and Extended Phase 1 Habitat Survey undertaken by EDP has identified the following valuable ecological features:
- Presence of Cannock Chase SAC 10 km north east of the Site;
 - Locally designated areas of semi-natural habitat adjacent to the boundaries of the Site;
 - Hedgerows, a water course, areas of potentially species rich grassland and mature trees within the Site; and

- Potential for great crested newts, breeding birds and foraging bats to be present (presence to be confirmed by further survey work).

12.54 However, there are no obvious 'in principle' (significant) ecological constraints that would preclude development, and which cannot be avoided by good design. Moreover, EDP considers that the Site and wider land parcel presents an opportunity to deliver a net gain to local biodiversity and contribute to the objects of the Staffordshire Biodiversity Action Plan as well as ensuring local and national policy compliance.

Impact on Environmental Quality

12.55 The agricultural site is unlikely to have significant issues in relation to contamination, and the surrounding context of the site is not considered to represent significant constraints in relation to air quality and noise.

12.56 Whilst it is accepted that development is unlikely to improve the environmental quality of the site as there are no existing issues of contaminated land, development would not give rise to any further environmental quality issues.

Site-Specific Opportunities

12.57 As set out previously within this representation, the development of the site for residential purposes presents the opportunity to deliver Road Option 7 to provide access to ROF Featherstone strategic employment site and to support the Council in the long-term aspiration to realise a new strategic park and ride facility at Brinsford.

12.58 In addition, the proposal would deliver a significant new green infrastructure and new community facilities, including a new primary school and co-located community hub.

12.59 Green infrastructure proposed could provide Green Belt compensatory measures and assist in providing a net gain in biodiversity.

12.60 Infrastructure delivery represents a significant benefit of allocating Land at Cross Green, for residential development.

12.61 Provision of approximately 1,200 new homes close to the ROF Featherstone strategic employment site also provides a unique opportunity to provide new homes to support jobs growth locally. It should also be noted that a linear, well-lit path also runs from the western edge of the site along the A449 to the strategic employment sites at i54 and Four Ashes.

Suitability

12.62 The information set out above, read in conjunction with the appended Development Vision Document, demonstrates that Land at Cross Green is a suitable site.

Deliverability

12.63 Taylor Wimpey holds a freehold interest in the majority of land contained within the proposed strategic development location.

12.64 Taylor Wimpey intends to undertake further technical work to demonstrate the deliverability of land at Cross Green, however information gathered to date concludes that there are no physical or other constraints likely to render the site undeliverable within the proposed Plan period to 2039. The site is available now.

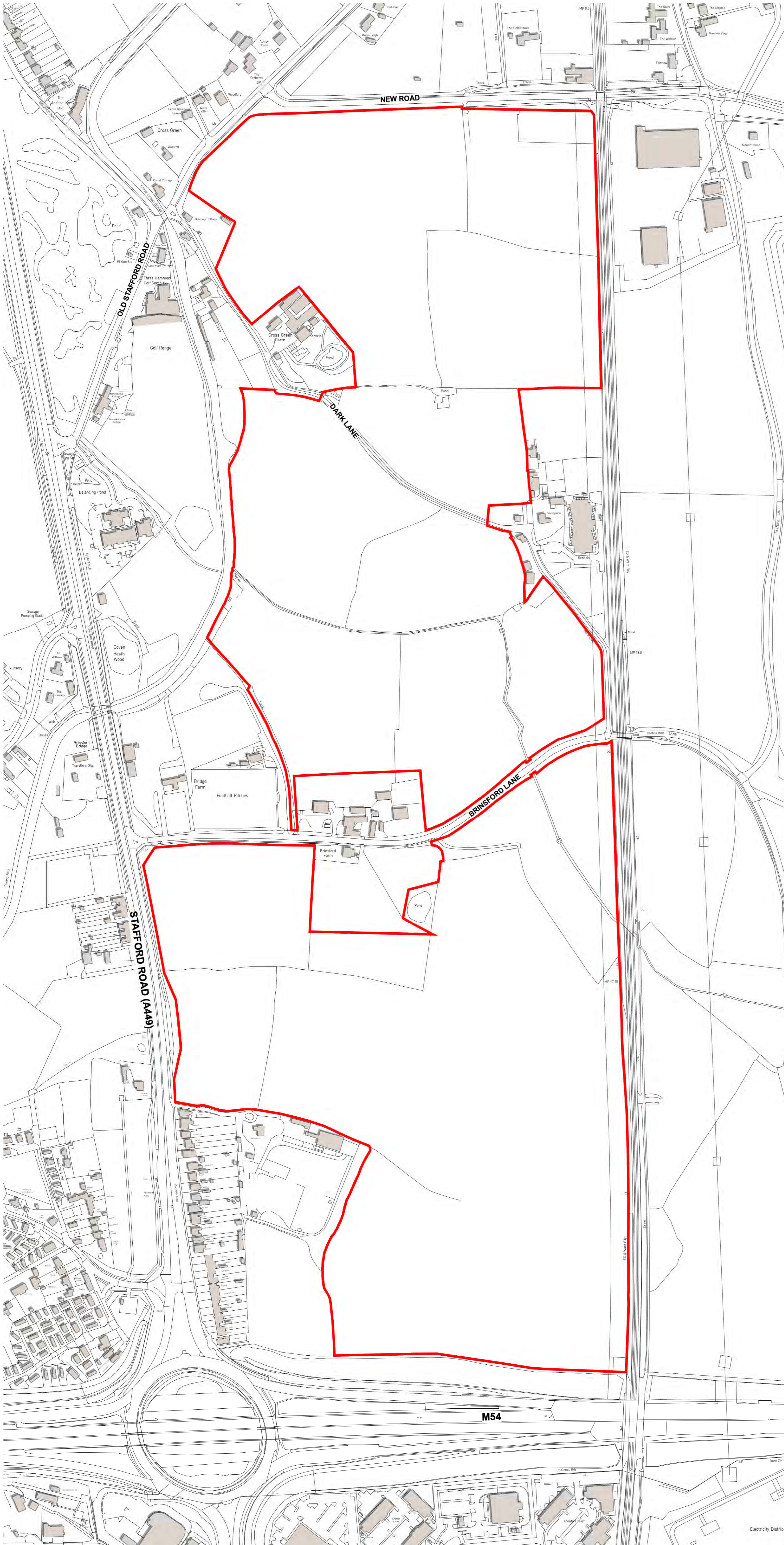
12.65 The site is deliverable and immediately available and, subject to allocation and removal of an element of the site from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years.

13. Conclusion

- 13.1 This representation is made by Evolve Planning on behalf of Taylor Wimpey to the South Staffordshire Local Plan Review, Publication Plan (Regulation 19) consultation. This representation relates to land at Cross Green, a proposed strategic development location, which Taylor Wimpey is promoting for residential-led development.
- 13.2 Taylor Wimpey supports the Council's proposed spatial development strategy, which includes the proposed strategic allocations at Cross Green and to the north of Linthouse Lane. Allowing growth to the north of the Black Country and within the Tier 1 and Tier 2 settlements provides a sound approach to distributing housing growth.
- 13.3 Taylor Wimpey supports the proposed Local Plan, however specific comments are provided in respect of the housing requirement, a number of development management policies and the Council's consideration of the evidence base in relation to Land at Cross Green.
- 13.4 The information contained within this representation, read in conjunction with the appended Development Vision Document and the updated Strategic Transport Assessment, demonstrates that Land at Cross Green is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 13.5 Taylor Wimpey is committed to progressing a Strategic Master Plan in conjunction with the Council, other stakeholders and the wider community.
- 13.6 It is therefore submitted that Land at Cross Green represents a sound strategic housing allocation.

APPENDIX 1

Site Location Plan



KEY
 SITE BOUNDARY (TBC)
 63.76 HA
 157.56 ACRES



CROSS GREEN VILLAGE, FEATHERSTONE | SITE LOCATION PLAN

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APPENDIX 2

Strategic Transport Assessment

Land at Cross Green
Strategic Transport Assessment



Transport Planning Consultants

Land at Cross Green
Strategic Transport Assessment

14th December 2022
SJT/TM 23199-02 Strategic Transport
Assessment__REV1

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23199-01-3b	Indicative New Road Site Access
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23199-14 to 23199-14-3	Indicative Footway Scheme on Cat & Kittens Lane
23199-J8	Legs Lane\Underhill Lane\ Bushbury Lane Mitigation
23199-12b-GA	Bushbury Lane\ Stafford Road Mitigation
23199-17-GA	Underhill Lane\ Cannock Road Mitigation (Signalisation)
23199-13C-GA	Underhill Lane\ Cannock Road Mitigation (Mini-roundabouts)

Figures

Figure 1	Site Context Plan (Inset)
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Appendix C	M54 – M6 Link Road
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1.0 INTRODUCTION

1.1 DTA Transportation Limited has been commissioned on behalf of Taylor Wimpey to provide transport advice in relation to the proposed allocation of Land at Cross Green for residential development within the emerging South Staffordshire Local Plan. The location of the site is shown on **Figure 1**.

1.2 This Strategic Transport Assessment (TA) has been prepared following discussions with South Staffordshire Council (SSC), Staffordshire County Council (SCC), the City of Wolverhampton Council (CWC) and National Highways (NH). It provides a high level strategic review of the impact of the proposed site allocation within the emerging Local Plan and focusses on deliverability. A more detailed TA would be required at the planning application stage.

1.3 The pertinent paragraphs from the National Planning Policy Framework (NPPF) in relation to the transport evidence base are set out below:

***Para 104.** Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

a) the potential impacts of development on transport networks can be addressed;

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

***Para 105.** The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.*



- 1.4 In terms of sustainable accessibility, the site is well located to take advantage of existing and proposed foot, cycle and public transport services in the local area. Opportunities for maximising connectivity between the proposed development and the local area are discussed in this report.
- 1.5 Primary vehicle access to the site is to be taken from the new link road proposed as part of the ROF Featherstone employment scheme which has been granted planning permission. Secondary points of vehicle access are proposed onto Brinsford Lane and New Road. Separate pedestrian/ cycle access points are also proposed and are shown on the illustrative site layout plan at **Appendix A**, which will form part of a pedestrian and cycle priority route through the site.
- 1.6 As part of STA, an assessment of the impact of the proposals on the operation of the local road network has been undertaken. This has primarily been done to inform the viability assessment of the emerging Local Plan and to derive indicative costs in relation to potential mitigation works. Consequently, this focusses on the local road network within Staffordshire and Wolverhampton. The STA also considers the overall access strategy for the site including walking, cycling and public transport accessibility.
- 1.7 A separate report assessing the impact of the proposed strategic allocations on the strategic road network has also been prepared and this was submitted to NH by PJA in June 2022 (ref: 6161 Cumulative SRN Summary – Final). This report specifically reviews the impact of the proposed strategic site allocations at: M54 Junction 2; M6 Junction 13; A449/ Brewood Roundabout; A5 Gailey Roundabout; and A449/ New Link Road Roundabout. That assessment demonstrates that mitigation would not be required at any junction on the strategic road network to accommodate the proposed site allocations.



2.0 POLICY CONTEXT

2.1 National Policy

National Planning Policy Framework

2.1.1 In July 2021, the Government published a revised National Planning Policy Framework (NPPF).

2.1.2 Paragraph 111 of the NPPF is clear that: *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*.

2.1.3 Within this context, the NPPF identifies in Paragraph 104 and 105 that:

“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places”*.

The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”.



2.1.4 Paragraph 113 of the NPPF goes on to state that: *"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed"*.

2.1.5 In reinforcing the principle of supporting sustainable development, paragraph 10 stipulates that at the heart of the Framework is *"...a presumption in favour of sustainable development"*.

Planning Practice Guidance (March 2014)

2.1.6 The Department for Communities and Local Government (CLG) first published the Planning Practice Guidance (PPG) in 2014, which reinforces the guidance contained in the NPPF. It is now an online resource which is regularly updated.

2.1.7 The PPG in Paragraph: 002 Reference ID: 42-002-20140306 states that Travel Plans and Transport Assessments are ways of assessing and mitigating the negative transport impacts of development in order to promote sustainable development. They are required for all developments which generate significant amounts of movements.

2.1.8 The Guidance goes on to explain what these documents are, why they are important, what information they should contain and how they should relate to one another.

Circular 02/2013 – The Strategic Road Network and the Delivery of Sustainable Development

2.1.9 Circular 02/2013 replaces the policy set out in Circular 02/2007 'Planning and the Strategic Road Network' and DfT Circular 01/2008 Policy on Service Areas and other Roadside Facilities on Motorways and All-purpose Trunk Roads in England. It sets out the way in which HE will engage with communities and developers to deliver sustainable development, whilst safeguarding the primary function and purpose of the SRN.

2.1.10 In terms of assessing development impact, Paragraph 25 of the Circular states that:

"The overall forecast demand should be compared to the ability of the existing network to accommodate traffic over a period up to ten years after the date of registration of a planning application or the end of the relevant Local Plan whichever is the greater. This is known as the review period."



National Model Design Code

- 2.1.11 The National Model Design Code sets out clear design parameters to help local authorities and communities decide what good quality design looks like in their area. It expands on the ten characteristics of good design set out in the National Design Guide, which reflects the government's priorities and provides a common overarching framework for design.

2.2 Local Policy

South Staffordshire Local Plan and Emerging Local Plan

- 2.2.2 The South Staffordshire Local plan provides the planning framework for all new development in South Staffordshire and is comprised of two documents; the Core Strategy which was adopted in 2012 and the Site Allocations Document which was adopted in 2018.

- 2.2.3 The Council is currently undertaking a review of the Local Plan and a consultation on the Preferred Options took place between November and December 2021. The Preferred Options consultation document identified Land at Cross Green as a Strategic Development Location to deliver a minimum of 1,200 homes to 2038, an on-site primary school and a local centre to include retail and community facilities of an appropriate scale, along with land for a rail-based Park & Ride.

Staffordshire Local Transport Plan 3 (2011)

- 2.2.4 In April 2011, SCC published the Strategy Plan for Staffordshire's third Local Transport Plan. It sets out the County Council's proposals for transport provision within the county, including walking, cycling, public transport, car-based travel and freight, together with the management and maintenance of local roads and footways.



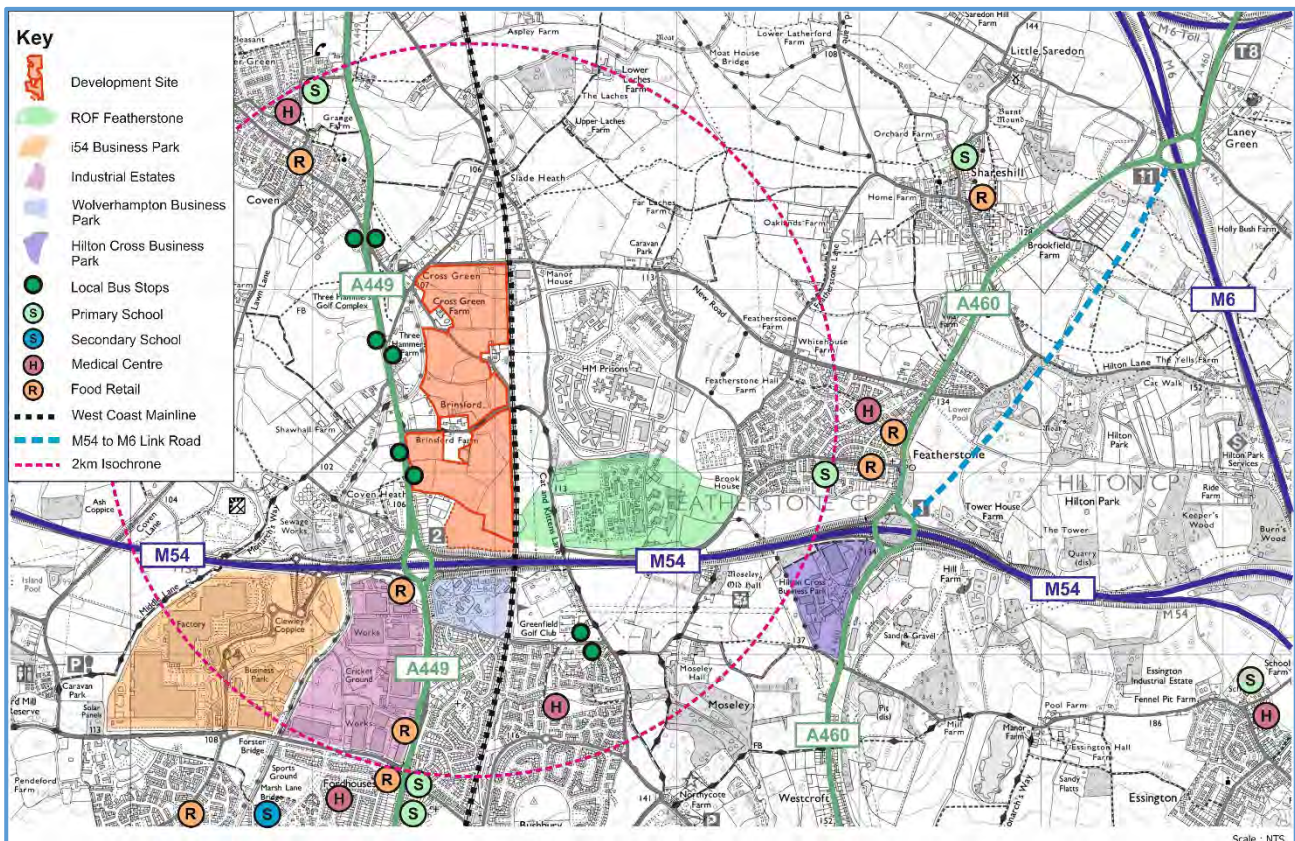
3.0 BACKGROUND CONDITIONS AND ACCESSIBILITY

3.1 Site Location

3.1.1 The development site is situated west of ROF Featherstone and is located between the A449 Stafford Road to the west and the West Coast Mainline (WCML) to the east. The M54 routes to the immediate south of the site and New Road to the north.

3.1.2 Featherstone village is located to the east of the site, Coven Heath to the west, and Cross Green, Slade Heath and Coven to the north. To the south of the site is Wolverhampton, which includes the nearby i54, Boundary Industrial Estate and Wolverhampton Business Park. The location of the site is shown in **Figure 1**.

Figure 1 – Site Context Plan





3.2 Strategic Road Network

A449 Stafford Road

- 3.2.1 The A449 Stafford Road to the west of the site (shown on **Figure 1**) is a dual carriageway road, with two lanes in each direction, which connects the A5 to the north with the M54 to the south. It provides a strategic north-south corridor linking into Stafford and the West Midlands. It is designated as trunk road between the A5 and M54, and street lighting is provided within the central reserve along the full length of the road between the A5 and M54.
- 3.2.2 The A449 connects with the M54 at Junction 2 via a large, signalised grade-separated roundabout, before continuing south into Wolverhampton (where it is no longer part of the strategic road network). To the north of M54 Junction 2, the road is subject to a 40mph speed limit before transitioning to a 60mph speed limit at Shaw Hall Lane. To the south, the A449 is dual carriageway road that passes through the centre of Wolverhampton.
- 3.2.3 Connections onto the A449 to the west within the vicinity of the site are provided via Brinsford Lane and Old Stafford Road, and take the form of left-in/ left-out priority T-junctions. To the north-west of the proposed development, Brewood Road joins with the A449 Stafford Road at two at-grade three-arm roundabouts, before passing Coven. It continues to the A5 which can be accessed via Gailey Island which is an at-grade four-arm roundabout. North of A5, the A449 continues northwards through Penkrige and joins with the M6 at J13.
- 3.2.4 As part of the employment scheme at ROF Featherstone, which has now been granted planning approval, a new access onto the A449 is proposed. The road, which includes a 7.3m wide carriageway and adjoining pedestrian/ cycle facilities, will connect the A449 Stafford Road with Cat and Kittens Lane. As shown on the drawing attached as **Appendix B**, a new roundabout will be constructed off the A449 and a bridge is to be provided over the WCML. A new four-arm roundabout will then be provided on Cat and Kittens Lane.



M54 Motorway

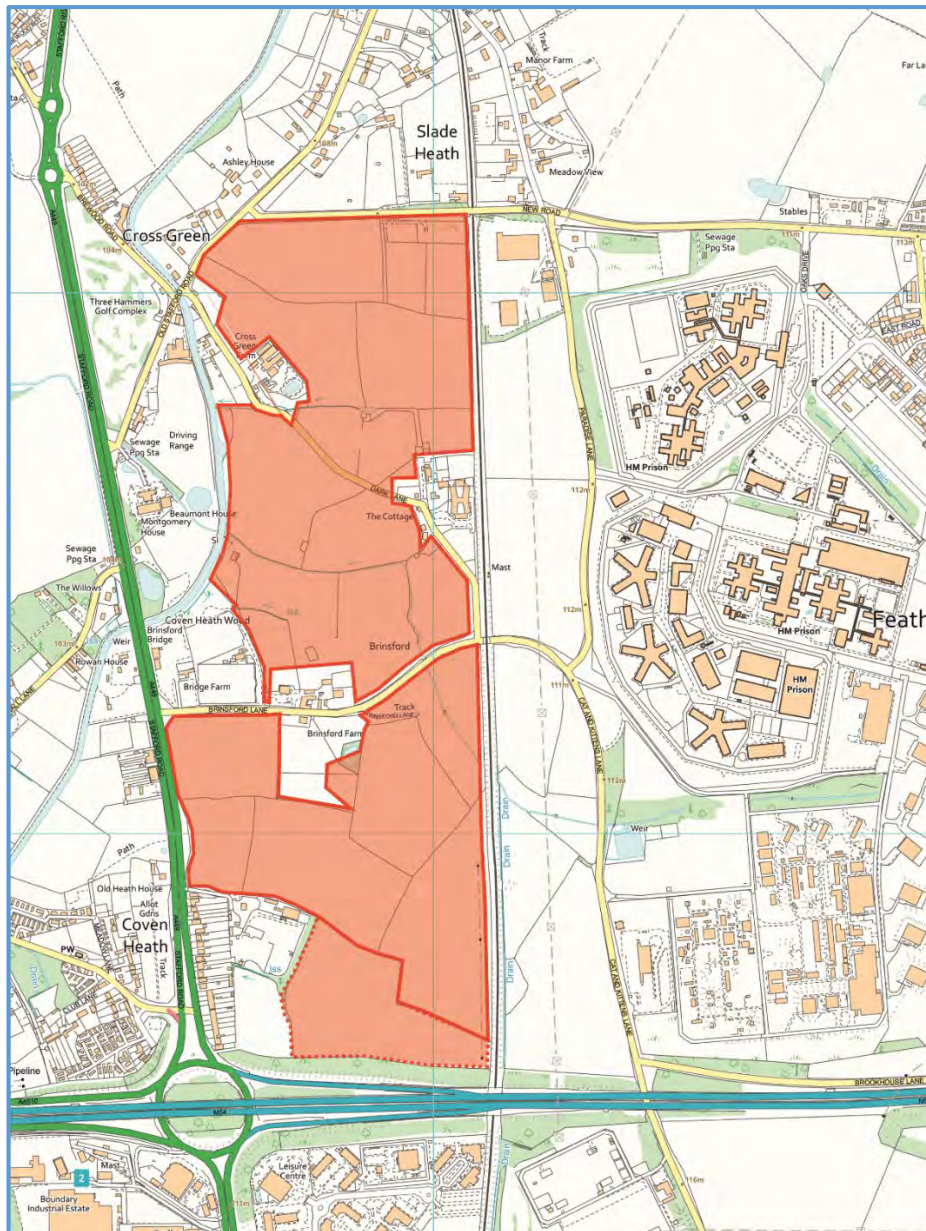
- 3.2.5 The M54 motorway, shown on **Figure 1**, runs between the M6 Junction 10A to the east and Telford to the west. In the vicinity of the site, between Junctions 1 and 2, it is a dual three-lane motorway. It has two lanes to the east of Junction 1 and to the west of Junction 2.
- 3.2.6 Direct connections to/from the M6 Motorway to the north are not available due to the arrangement at M6 Junction 10A. Therefore, a significant volume of traffic currently uses the A460 to the north of M54 Junction 1 when travelling between the two motorways. Traffic travelling north and west also uses the A449 and A5 from M6 Junction 12.
- 3.2.7 Junction 2 of the M54 is located to the north-west of the development site, where there is a four-arm fully signalised grade-separated roundabout connecting the M54 motorway with the A449 Stafford Road. The westbound on-slip and eastbound off-slip to the motorway are not directly from this roundabout, but from two smaller roundabouts via the A4510 to the west of the junction, which also provide access to the nearby i54 business park.
- 3.2.8 To the east, M54 Junction 1 is a grade-separated roundabout with slip roads provided to/ from the M54 Motorway with east and west facing slips. To the north of the M54, the A460 continues as a single carriageway road past Featherstone and through Shareshill, providing connection to M6 Junction 11.
- 3.2.9 A Development Consent Order (DCO) was submitted to the Planning Inspectorate earlier this year for the creation of a new link road between M54 Junction 1 and M6 Junction 11. This includes significant alterations to M54 Junction 1 as indicated on the plan attached as **Appendix C**. The DCO was accompanied by a Transport Assessment and it was granted consent in April 2022.
- 3.2.10 The provision of the link road is specifically focussed on reducing traffic flows and associated levels of congestion/ delays on the A460 to the east of the site. Once implemented, the scheme is forecast to reduce traffic flows by approximately 26,000 vehicles per day (two-way) or to 11% of what they would have been without the scheme.



3.3 Local Road Network

3.3.1 The local road network within the vicinity of the site is shown in **Figure 2** and is discussed below.

Figure 2 – Site Location Plan





Brinsford Lane/ Cat and Kittens Lane

- 3.3.2 Brinsford Lane is circa 6.9m wide single carriageway road passing through the centre of the proposed development site. To the west, it connects with the A449 Stafford Road at a left-in/ left-out priority T-junction. To the east, it passes underneath the WCML where there is localised narrowing and a height restriction. Immediately to the west of the WCML is Dark Lane which joins with Brinsford Lane at a priority T-junction and continues north through the proposed development as a circa 3m wide single track road before connecting with Old Stafford Road to the north.
- 3.3.3 Brinsford Lane then becomes Cat and Kittens Lane at its junction with Paradise Lane. To the south, Cat and Kittens Lane is a circa 7m wide single carriageway road and provides connection to Brookhouse Lane via a priority T-junction which routes east to Featherstone. It then continues under the M54 Motorway to Greenfield Lane and Moseley Road, after which it becomes Northycote Lane.
- 3.3.4 Brinsford Lane/ Cat and Kittens Lane is subject to the 60mph national speed limit between the A449 Stafford Road and circa 80m north of Greenfield Lane, where the speed limit reduces to 30mph as it approaches the built up area.

Brookhouse Lane

- 3.3.5 Brookhouse Lane initially runs parallel to the M54 Motorway from Cat and Kittens Lane before angling to the north and providing access to Featherstone. The road has a 7.3m wide carriageway, with a shared footway/cycleway running along the southern side of the road for much of its length.
- 3.3.6 Brookhouse Lane is subject to a 60mph national speed to the east of Cat and Kittens Lane, before reducing to 30mph around 200m south of its junction with East Road. It narrows on the approach to Featherstone and continues through the village, changing to The Avenue at Hilton Road and connecting to the A460 Cannock Road at a priority controlled junction.



Paradise Lane

- 3.3.7 Paradise Lane is a circa 6.5m wide single carriageway road located to the east of the site and is subject to the national speed limit. To the north, it connects with New Road via a crossroads with ghost-island right-turn.

New Road

- 3.3.8 New Road is a circa 6.7m wide single carriageway road which routes between Old Stafford Road to the west and the A460 to the east. The road is subject to a 40mph speed limit and passes over the WCML before joining with Old Stafford Road via a priority T-junction. To the east, New Road routes across the northern edge of Brinsford and Featherstone and joins with the A460 at a signalised crossroads.

Old Stafford Road

- 3.3.9 From its junction with New Road, Old Stafford Road is circa 6.5m wide and passes over a hump-backed bridge crossing the Staffordshire & Worcestershire Canal. Immediately after the bridge it forms a priority T-junction with Brewood Road before continuing to the A460 there is a left-in/ left-out priority T-junction.

Brewood Road

- 3.3.10 Brewood Road connects Old Stafford Road with the A460 – a distance of around 300m, and is subject to a 30mph speed limit. Access from Brewood Road to the A460 is provided via an at-grade roundabout facilitating connections north and south. Around 90m to the north there is a second roundabout and Brewood Road continues to the north-west through Coven.
- 3.3.11 Minor alterations to the northern A460/ Brewood Road roundabout are proposed as mitigation works in relation to the ROF Featherstone employment scheme.



A460 Cannock Road

- 3.3.12 The A460 Cannock Road connects the M6 to the north via Junction 11 with the M54 to the south via Junction 1. The A460 is generally a wide single carriageway, with a width of circa 9m to the south of M6 Junction 11 and is subject to a 50mph speed limit. Approximately 600m to the south of M6 Junction 11, the A460 transitions to a 40mph speed limit. As the road enters Featherstone the speed limit reduces again to 30mph, as the road passes through the built up area.
- 3.3.13 Beyond M6 Junction 11, the A460 crosses the M6 Toll and there is a four-arm roundabout providing access to the A4601 and M6 Toll eastbound on-slip. The A460 then runs parallel to M6 Toll before turning north to provide access to Cannock.
- 3.3.14 At the north-eastern end of Featherstone village, A460 connects with New Road and Park Lane at a traffic signal controlled junction.

3.4 **Highway Safety**

- 3.4.1 A high level review of highway safety in relation to the local highway network links has been undertaken based on five-year personal injury collision (PIC) data for the latest period of 2016-2020. This information is summarised in **Table 1**.
- 3.4.2 With regard to M54 Junction 2, which represents the primary point of distribution for development traffic onto the strategic road network, only one PIC has been recorded over the last five year period at the signalised grade-separated roundabout connecting the M54 motorway with the A449 Stafford Road. This was a 'slight' PIC which took place in 2018 on the A4510 eastbound approach to the gyratory. One PIC was also recorded at the smaller roundabout to the west where the M54 eastbound off-slip connects with the A4510. Again this was 'slight' in nature and the incident took place in 2019. No PICs were recorded on the slip roads.



Table 1 – PIC Link Review

Link	Number of PICs by Link			
	Fatal	Serious	Slight	Total
A449 Stafford Road between Brewood Road and Old Stafford Road	0	0	0	0
A449 Stafford Road between Old Stafford Road and Brinsford Lane	0	0	0	0
A449 Stafford Road between Brinsford Lane and M54 Junction 2	0	0	1	1
Brinsford Lane between A449 Stafford Road and Brookhouse Lane	0	0	1	1
Cat and Kittens Lane between Brookhouse Lane and Greenfield Lane	0	0	0	0
Dark Lane between Brinsford Lane and Old Stafford Road	0	0	0	0
Brookhouse Lane between Cat and Kittens Lane and East Road	0	0	0	0
Paradise Lane between Brinsford Lane and New Road	0	0	0	0
New Road between Old Stafford Road and Paradise Lane	0	0	1	1
New Road between Paradise Lane and Featherstone Lane	0	1	1	2
New Road between Featherstone Lane and A460	0	1	3	4
Old Stafford Road between New Road and A449 Stafford Road	0	0	0	0
Brewood Road between Old Stafford Road and A449 Stafford Road	0	0	0	0
A460 Cannock Road between M54 Junction 1 and The Avenue	0	0	4	4
A460 Cannock Road between The Avenue and New Road	0	0	4	4
A460 Cannock Road between New Road and Hilton Lane	0	0	4	4
A460 Cannock Road North between Church Road and M6 Junction 11	0	1	9	10
Total	0	3	28	31

3.4.3 Overall, it is evident from the available data that the number of PICs occurring on the highway network within the vicinity of the site is low.

3.5 Traffic Surveys

3.5.1 Manual turning count and automated traffic count surveys were undertaken in March 2022 on the local road network. A summary of the traffic movements on the adjacent highway network including the A449, Cat and Kittens Lane, Brinsford Lane and New Road is provided in **Table 2**.



Table 2 – Link Flow Summary

Link	Two-way Vehicle Flows		
	AM Peak	PM Peak	Daily
A449	1,805	1,838	22,797
Cat and Kittens Lane	714	613	6,663
Brinsford Lane	201	108	1,378
New Road	566	506	5,621

3.6 Walking and Cycling

- 3.6.1 Foot and cycle facilities within the vicinity of the site are currently limited; however there is significant scope to improve connectivity as part of the development proposals and a package of enhancements have been identified as part of the adjacent ROF Featherstone scheme. These are discussed in **Section 4**.
- 3.6.2 In terms of those roads currently intersecting the development site, there is no footway provision on Brinsford Lane/ Cat and Kittens or Dark Lane. These are however identified as advisory cycle routes on Staffordshire County Council's Cycle Map covering South Staffordshire attached as **Appendix D**, along with Paradise Lane, Dark Lane, New Road, Old Stafford Road and Brewood Road.
- 3.6.3 There is a circa 2.5m wide shared footway/cycleway that runs along the southern side of Brookhouse Lane for around 1km east of the junction with Cat and Kittens Lane. This footway does not extend as far as the junction with East Road where Brookhouse Lane continues towards Featherstone and where a footway is provided.
- 3.6.4 There are lit shared foot/ cycleways running along both side of the A449 Stafford Road to the north of M54 Junction 2. These extend northwards past Coven, with the facility on the eastern side of the A449 Stafford Road extending into Penkrudge.
- 3.6.5 Signalised toucan crossings are provided across the northern gyratory of M52 Junction 2, with a shared foot/ cycleway provided around the entire central island. Again, signalised toucan crossing facilities are provided on the southern side across the gyratory, facilitating movements to the significant employment opportunities nearby at i54, Boundary Industrial Estate and Wolverhampton Business Park, and beyond into Wolverhampton.



3.6.6 There are no existing public rights of way through the site, with the closest being located to the west. An extract from the online Public Rights of Way map showing the PROW network in the wider area is attached as **Appendix E**.

3.7 **Public Transport**

3.7.1 The nearest existing bus services to the site are to the west of the proposed development, accessed from the A449 Stafford Road. These are shown on **Figure 1**.

3.7.2 Northbound and southbound stops are located to the south of Brinsford Road, with the southbound stop including a bus layby. Existing facilities at these stops are limited and there is a substandard pedestrian crossing over the A449 providing access to the northbound stop. These are served by the no.877 and 878 which together have a circa hourly daytime frequency. These provide connections south into the centre of Wolverhampton, past Wolverhampton Business Park, and north into the centre of Stafford.

3.7.3 Bus stops are also located at the A449/ Old Stafford Road junction to the north-east of the site, which also provide access to the no. 877 and 878. Both stops have bus bays, and the southbound stop also has a bus shelter. There is an uncontrolled staggered dropped kerb crossing between the guard railing separating the north and southbound dual carriageways.

3.7.4 To the south, the nearest bus stops to the site are located on Greenfield Lane (see **Figure 1**) and include flagpoles with timetable information and waiting areas. These are served by the no.65 which has an hourly day-time frequency.

3.7.5 The nearest rail station to the site is Wolverhampton Station located around 7km to the south. The station provides frequent train services to numerous destinations including Stafford, Birmingham, Manchester and London. West Midlands Metro services are also available in Wolverhampton, providing access to/ from the West Midlands conurbation.



3.8 **Local Facilities**

3.8.1 This section of the report considers access to the following services:

- Education;
- Retail;
- Leisure;
- Healthcare; and
- Employment.

3.8.2 The majority of trips that will be made by foot or cycle from the proposed development will be for the purpose of short shopping trips, access to leisure facilities, school journeys, and trips to bus stops as part of linked trips to other destinations.

3.8.3 It is generally considered that for distances under 2km, walking offers the greatest potential to replace short car trips. For distances under 5km, cycling also has the potential to substitute for short car trips. **Figure 1** shows some of the local amenities near the site and includes a 2km isochrone.

Education

3.8.4 As part of the development scheme, circa 2ha of land for educational purposes has been identified. Whilst the end use is still to be confirmed, it is likely to be a two form primary school which will serve future occupants of the site as well as potentially existing residents from the local area. Other primary schools located within the vicinity of the site are shown on **Figure 1**.

3.8.5 With regard to secondary education, it is not known at this stage which secondary school the children from this development would attend. However, if the distance to the secondary schools is greater than three miles then pupils would be entitled to free school travel. SCC would require this to be provided by the developer.



Retail

- 3.8.6 As shown on the indicative site layout at **Appendix A**, a District Centre is proposed as part of the scheme, which would provide a range of facilities including local retail shops.
- 3.8.7 In terms of wider shopping facilities, the closest food superstore is Morrisons which is located off Blaydon Road approximately 4.6km to the south-west of the site via the most direct route. Significant shopping facilities are located within the centre of Wolverhampton (located around 6.9km from the centre of the site) and Bentley Bridge Retail Park (circa 8km travel distance).

Leisure

- 3.8.8 There are various leisure opportunities located within Wolverhampton, including Wolverhampton Swimming and Fitness Centre, WV Active Aldersley, Bentley Bridge Leisure Park and numerous facilities within the town centre which is located around 6.9km from the centre of the site.

Healthcare

- 3.8.9 There is scope for a new GP surgery to be provided within the District Centre as part of the development proposals, which would serve residents of the proposed development whilst also accommodating any surplus demand from the local area.
- 3.8.10 In terms of existing healthcare provision, the closest GP surgery is Mayfield Medical Practice which is located circa 3km from the centre of the site to the south of the M54 Motorway.
- 3.8.11 The closest hospital to the site offering A&E services is the New Cross Hospital in Wolverhampton, located approximately 6.5km away from the site.

Employment

- 3.8.12 There are several significant employment generators in the vicinity of the site, including the i54 and Wolverhampton Business Parks which are shown on **Figure 1**. These are located around 2.7km and 1.7km respectively from the centre of the site. As discussed in this report, there are also significant employment opportunities associated with the strategic employment allocation at ROF Featherstone which has now been granted planning consent.



Summary

- 3.8.13 Overall, it is concluded that the site is well located in terms of access to local facilities and the scale of potential development of the site also lends itself to the provision of additional amenities. Opportunities for enhancing accessibility between the development site and these local facilities are considered in **Chapter 4**.



4.0 ACCESS ARRANGEMENTS

4.1 Vehicle Access

- 4.1.1 There are a number of opportunities to access the site by vehicle which are discussed below and these have been subject to junction capacity assessments in **Chapter 5**. The final design and layout of any accesses would be the subject of a future detailed TA accompanying a planning application for the site.
- 4.1.2 It is proposed that primary vehicle access to the site be taken from a new road to be constructed between the A449 Stafford Road and Cat and Kittens Lane, over the WCML, as part of the adjacent ROF Featherstone employment application. The link road will comprise a 7.3m wide single carriageway with a 2m wide footway along the northern side of the carriageway, and a shared 3m wide foot/ cycleway to the south. The majority of the road will be at-grade, rising on a series of embankments as it crosses over the railway to link with Cat and Kittens Lane.
- 4.1.3 At this stage, two single points of vehicle access to the new link road are proposed – one serving the northern plot and another the southern plot. For the purposes of this STA, it has been assumed that priority T-junctions with ghost-island right-turn facilities would be required to serve the development site and these are shown indicatively on **Drawing 23199-01b**. However, the exact form and location of any accesses would be determined at the planning application stage.
- 4.1.4 In addition to providing primary points of access to the new link road, vehicle accesses are also proposed onto Brinsford Lane which is a circa 6.9m wide single carriageway road passing through the centre of the proposed development site. At this stage, given the low level of background traffic flows, it is proposed that two simple priority T-junctions would be provided and these are shown on **Drawing 23199-01-2b**. As above, the exact form and location of any accesses would be determined at the planning application stage.
- 4.1.5 To the east of the site access there is a pinch point where Brinsford Lane passes under the railway line and the introduction of signalised shuttle workings or potentially a bus-gate at this location could be beneficial at this location and would be discussed with the local highway authority when a planning application is being prepared.



4.1.6 It is envisaged that vehicle access would also be provided onto New Road to the north. For the purposes of this STA, it has been assumed that a priority T-junction with ghost-island right-turn facility would be required and this is shown indicatively on **Drawing 23199-01-3b**.

4.1.7 Finally, Dark Lane routes through the northern site, currently connecting Brinsford Lane to the south with Old Stafford Road to the north. The proposed spine road through the site will cross this lane. It is not intended that Dark Lane would be used by development vehicle traffic and would instead become a 'Quiet Lane', providing an attractive route for active travel users both within the site and beyond.

4.2 **Sustainable Access**

Walking and Cycling

4.2.1 Key to promoting walking and cycling is the design of the development – specifically that the environment addresses actual and perceived safety issues. Underlying this is an emphasis on placemaking with a user hierarchy which places pedestrians at the top reflecting the ethos extolled by Manual for Streets (MfS). The National Model Design Code suggests that to ensure walking and cycling are the first choice for short local journeys, the routes should be *"continuous, clear, relatively direct and attractive [...] both within a large site and into the surroundings."*

4.2.2 It is important that the site is integrated into the existing area both to ensure that there are a coherent network of routes, and to ensure that there are not external issues that would undermine the efforts to encourage walking and cycling within and to/from the site. This is achieved by identifying gaps in the provision for pedestrians and cyclists on the local road network.

4.2.3 As set out above, access to the nearby village of Featherstone and the local facilities available there are currently provided along Brookhouse Lane, which is accessible to the site via Cats and Kittens Lane. Brookhouse Lane already benefits from a shared use cycleway/footway along much of its length, which joins the carriageway at the 30mph speed limit sign in Featherstone.



- 4.2.4 Improvements to connectivity between the proposed development and Featherstone are to be provided as part of the ROF Featherstone scheme to the east. This includes the provision of a 2m wide footway and 3m wide shared foot/ cycleway along Brinsford Road, continuing through the ROF Featherstone site to the east before connecting onto Brookhouse Lane immediately to the south-west of Featherstone.
- 4.2.5 To the west, the foot/ cycle infrastructure on the new link road will provide connection to the existing facilities running along the A449. A pedestrian and cycle priority route is proposed through the site as shown on the illustrative site layout plan at **Appendix A**. This crosses the new link road and it is proposed that a signalised toucan crossing would be provided to facilitate these movements.
- 4.2.6 The proposed access onto the A449 from the link road provides connection to the existing foot/ cycle facilities running along both sides of the carriageway. A signalised staggered crossing is shown on the link road plan at **Appendix B**, immediately to the south of the new roundabout thus providing improved connectivity.
- 4.2.7 A 'recreational route' runs along the length of Brinsford Lane and there is evidence of a surfaced footway on the southern verge which is currently overgrown. Brinsford Lane is currently constrained where it passes under the railway line and the creation of a priority arrangement or the implementation of a bus gate in this location could be beneficial. Where the pedestrian and cycle priority route crosses Brinsford Lane, it is proposed that crossing facilities will be provided. The form of these crossings would be agreed at the planning application stage.
- 4.2.8 As set out above, it is proposed that Dark Lane, which connects with Brinsford Lane immediately to the west of the bridge, would become a 'Quiet Lane', providing an attractive route for active travel users both within the site and beyond. This exits onto Old Stafford Road adjacent to the bridge crossing over the Staffordshire & Worcestershire Canal. As discussed below, a potential scheme to improve access to/ from the canal towpath at this location has been identified.



- 4.2.9 To the north, there is an existing footway running along the northern side of New Road. The footway extends to Rabbit Lane to the east before continuing along the southern side of the carriageway into Featherstone, at which point it is lit. To the west, the footway connects to Old Stafford Road where it continues north into Slade Heath along the eastern side of the carriageway as a narrow path. There is also evidence of a surfaced footway on the eastern side of Old Stafford Road to the south of New Road which terminates before the bridge crossing over the Staffordshire & Worcestershire Canal.
- 4.2.10 Another footway commences approximately 60m to the south-west of the bridge along the eastern side of Old Stafford Road and this terminates circa 20m from the foot/cycleway running along the A449. There are no footways on Brewood Road for the first 115m from Old Stafford Road, although there is access to the towpath running parallel to the road. After this point there is a footway along the eastern side of Brewood Road which can be accessed from the towpath and this provides connection north towards the A449 and beyond to Coven.
- 4.2.11 Foot/ cycle connections onto New Road and Old Stafford Road to the north will be provided via the: proposed vehicle access; the pedestrian and cycle priority route; and also via Dark Lane which would become a Quiet Lane as part of the development proposals.
- 4.2.12 SCC has proposed a number of foot/ cycle improvements that they would like to see come forward as part of the proposals to LTN 1/20 standards where possible, including:
- Footway / cycleway provision along Brewood Road, connecting into the existing facilities on the A449 with an improved LTN 1/20 standard junction;
 - Footway / cycleway provision along New Road, connecting into the existing employment destinations at and near to the prisons at Oaks Drive;
 - Footway / cycleway provision along New Road, between Oaks Drive and Featherstone Lane (approximately 1km) to provide linkages to various leisure routes which can be accessed to the north of New Road in the vicinity of Featherstone Lane;



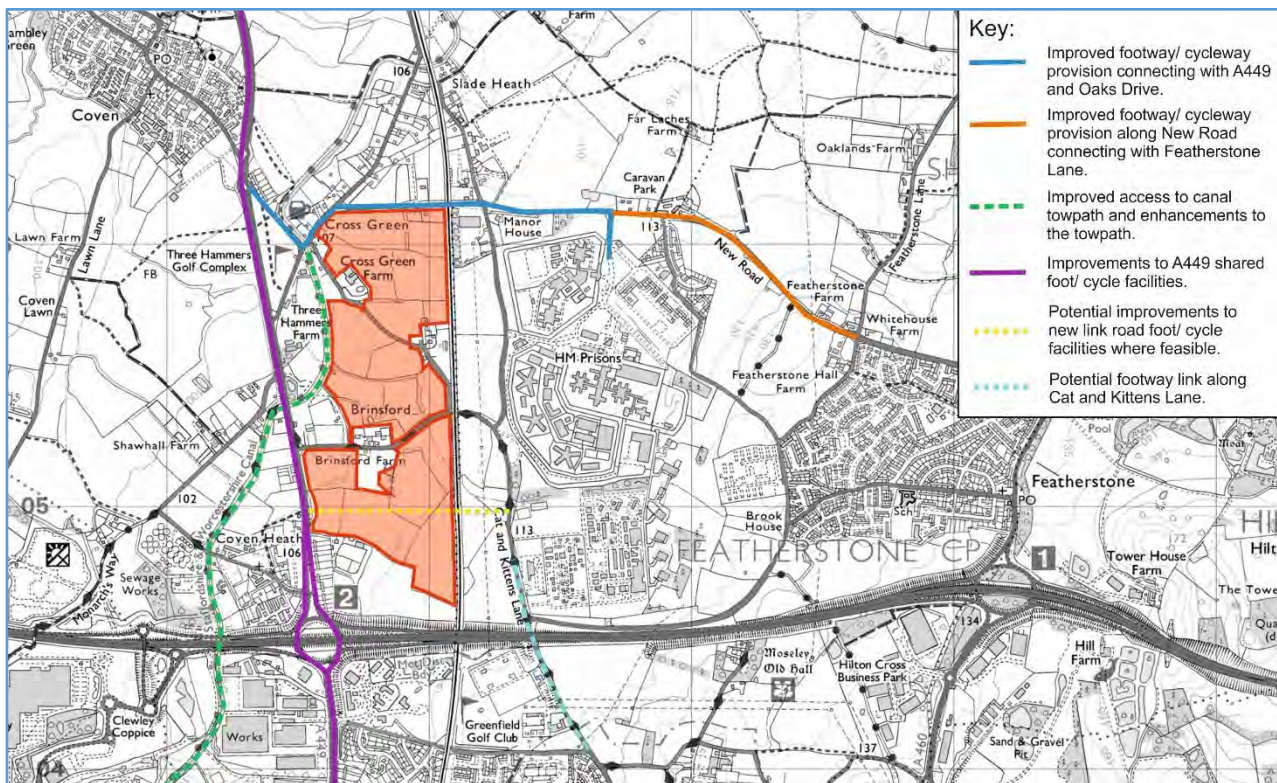
- Improved access to the Canal towpath at the Dark Lane / Old Stafford Road / Brewood Road junction combined with enhancements to the canal towpath (where required) between The Anchor Inn and I54 employment area. An indicative scheme showing how improved access onto the towpath could potentially be achieved is shown on **Drawing 23199-18a-GA** and would be reviewed in further detail at the planning application stage; and
- Improvements to the new link road foot/ cycleway to comply with LTN 1/20 where feasible.

4.2.13 In addition to the above, CWC has indicated that walking/ cycling improvements should be provided along Cat and Kittens Lane to the south, providing connection into Wolverhampton. The potential for a footway to be provided along Cat and Kittens Lane, connecting Greenfield Lane with the new infrastructure being provided as part of the ROF Featherstone development to the north of Brookhouse Lane, has therefore been explored. As shown on **Drawings 23119-14, 23199-14-2** and **23199-14-3**, the provision of a link appears to be achievable within the adopted highway but would be subject to a more detailed review at the planning application stage.

4.2.14 These potential walking and cycling improvements are shown indicatively in **Figure 3** and the details of these would be further reviewed/ developed at the planning application stage in conjunction with the local highway authority.



Figure 3 – Indicative Foot/ Cycle Improvement Plan



4.2.15 In terms of the development site, it would be designed to facilitate foot and cycle movements along desire lines, linking to the external access points. This will include the provision of the following where appropriate in line with MfS and MfS2:

- A good level of street and path lighting;
- Warning signs prior to junctions;
- On-site roads will be designed to 20mph;
- Tactile and coloured surfacing;
- Safety kerbing;
- Reduced junction mouth widths to promote slower vehicle speed where appropriate;
- and
- Signage to direct pedestrians and cyclists to key facilities and places of interest, including distances.



- 4.2.16 The illustrative site layout plan at **Appendix A** is designed to provide attractive active travel corridors to allow maximum permeability of the site by these modes of travel and excellent provision will be provided through the creation of a pedestrian and cycle priority route.
- 4.2.17 A mix of cycle parking facilities will be provided at the development to comply with local standards and will be designed and tailored to the likely needs of future occupants.

Public Transport

- 4.2.18 The existing public transport facilities in relation to the proposed development site are discussed in **Section 3.7**. No specific improvements to bus services are identified in the TA prepared for the ROF Featherstone application, which instead makes reference to providing connections to existing bus stops.
- 4.2.19 Measures to enhance bus provision to/ from the proposed development will be required. It is likely that bus services will change between now and the planning application stage and therefore it is important to retain flexibility. However, in line with SCC's initial comments, it is considered that the potential extension of Wolverhampton service route 3 may be appropriate given its current terminus in Fordhouses by Wolverhampton Business Park. It is envisaged that this would have a minimum 30 minute daytime frequency between the site and Wolverhampton.
- 4.2.20 The primary vehicle route through the site is designed to accommodate bus penetration through the development. The layout of the site would be designed to ensure that all dwellings are located within 400m of a bus stop. The above is in line with the National Model Design Code which states that a *"site or location has good public transport accessibility when dwellings have a public transport stop within walking distance"*.
- 4.2.21 There is also the potential to provide a new Rail Halt station Park & Ride on the adjacent railway line which bounds the site to its east, for which the site would facilitate delivery. This is shown indicatively on the illustrative layout at **Appendix A**. This would provide access to the WCML connecting Wolverhampton to Stafford, Manchester, Liverpool, Glasgow, Birmingham and London Euston. Providing a halt station in this location would benefit the site and the ROF Featherstone employment site by providing a direct rail link for longer journeys.



- 4.2.22 It is understood from discussions with SCC that the Strategic Outline Case for the station is well underway and detailed studies are ongoing. The deliverability of providing such a facility would be explored should the site be taken forward for future development; however, it is evident that there is scope to deliver a sustainable development without the potential rail halt station.



5.0 REVIEW OF TRAFFIC IMPACT

5.1 Introduction

5.1.1 The Preferred Options consultation document identified Land at Cross Green as a Strategic Development Location to deliver a minimum of 1,200 homes to 2038, an on-site primary school and a local centre to include retail and community facilities of an appropriate scale, along with land for a rail-based Park & Ride. A review of the likely traffic generation, distribution/ assignment of traffic and consideration of off-site highway capacity has been undertaken. This focusses specifically on the local road network within Staffordshire and Wolverhampton.

5.1.2 A separate report assessing the impact of the proposed strategic allocations on the strategic road network has also been prepared and this was submitted to NH by PJA in June 2022 (ref: 6161 Cumulative SRN Summary – Final). This report specifically reviews the impact of the proposed strategic site allocations at: M54 Junction 2; M6 Junction 13; A449/ Brewood Roundabout; A5 Gailey Roundabout; and A449/ New Link Road Roundabout. That assessment demonstrates that mitigation would not be required at any junction on the strategic road network to accommodate the proposed site allocations.

5.2 Trip Generation

5.2.1 The vehicle trip rates used in this STA have been provided by SCC and have been derived from recent extensive surveys and Transport Assessments in various areas of South Staffordshire, namely Perton (2 no.), Penkridge and Cheslyn Hay. The vehicle trip rates and associated trip generation for the site are set out in **Table 3**. Measures for further reducing traffic generation would be set out in a comprehensive Travel Plan at the planning application stage.

Table 3 – Vehicle Trip Rates & Trip Generation

	Morning Peak (08:00 – 09:00)			Evening Peak (17:00 – 18:00)		
	IN	OUT	TOTAL	IN	OUT	TOTAL
Vehicle Trip Rates (per dwelling)	0.108	0.339	0.447	0.328	0.158	0.486
Vehicle Trip Generation (1200 Units)	130	407	537	394	190	584



5.2.2 In addition to the residential trip generation, it has been agreed that consideration needs to be given to the proposed Brinsford Park and Ride site. In line with SCC's assumptions which were informed by the Outline Business Case, the following peak hour trip generation in **Table 4** has been assumed for this use.

Table 4 – Park & Ride Vehicle Trip Generation

	Morning Peak (08:00 – 09:00)			Evening Peak (17:00 – 18:00)		
	IN	OUT	TOTAL	IN	OUT	TOTAL
Vehicle Trip Generation	138	21	159	21	138	159

5.2.3 The total vehicle trip generation for the site comprising both the residential scheme and Park & Ride is set out in **Table 5**. Whilst this is considered to provide a reasonable basis for undertaking the strategic assessment of highways impact to inform the emerging Local Plan evidence base, this would need to be revisited as appropriate at the planning application stage when a more detailed Transport Assessment would be required.

Table 5 – Total Vehicle Trip Generation

	Morning Peak (08:00 – 09:00)			Evening Peak (17:00 – 18:00)		
	IN	OUT	TOTAL	IN	OUT	TOTAL
Vehicle Trip Generation	268	428	696	415	328	743

5.3 Trip Distribution and Assignment

5.3.1 To understand the potential future distribution of traffic generated by the proposed development, 2011 Census journey to work data has been interrogated for the Middle Super Output Area (MSOA) of South Staffordshire 006 in line with the feedback received during scoping. This data is attached as **Appendix F**.

5.3.2 A summary of main journey to work destinations for residents living within the MSOA is provided in **Table 6**.



Table 6 – Journey to Work Destinations

Destination	Percentage
Birmingham	5.4%
Cannock Chase	5.5%
Dudley	2.6%
Lichfield	1.8%
Sandwell	3.6%
South Staffordshire	21.6%
Stafford	2.6%
Telford & Wrekin	2.7%
Walsall	9.3%
Wolverhampton	35.7%
Other*	9.3%
Total	100%

* Includes all areas with less than 1% draw

5.3.3 Vehicle traffic has been assigned between the site and workplace MSOAs based on the car driver distribution using the origin-destination tool within ArcGIS based on journey time. This exercise has been undertaken for the morning peak and evening peak in order to take into account potential congestion and delay on the network. Diagrams showing the resulting assignment of traffic through the local road network are attached as **Appendix G**.

5.4 Background Growth

5.4.1 A 2038 future year baseline has been derived using 2022 traffic survey data and TEMPRO growth factors. The analysis also takes into account a number of committed developments which are discussed below.

TEMPRO

5.4.2 To account of background housing and employment growth, the observed traffic flows were factored where appropriate using the DfT's TEMPRO 7.2c computer programme using the National Trip End Model (NTEM) dataset 72 and the 'Road Traffic Forecast 2018 Scenario 1 – Reference'.

5.4.3 For the interrogation of the TEMPRO database, the MSA of South Staffordshire 006 within which the site is located was chosen. The growth rates for 'car drivers only' were then selected with the trip end type being defined as 'origin/destination'. These were obtained for the weekday AM and PM peaks (07:00 – 09:59 & 16:00 – 18:59). The resulting growth factors are shown in **Table 7** for the assessed scenarios.



Table 7 – TEMPRO Growth Factors

Years	Road Type	AM Growth Figure	PM Growth Figure
2022-2038	Principal	1.0826	1.0804
	Trunk	1.0908	1.0886
	Motorway	1.1391	1.1369

5.4.4 Several of the local junctions assessed within this STA are located within Wolverhampton, and therefore the TEMPRO growth factors for Wolverhampton were also reviewed and these are shown in **Table 8**. The resulting growth rates are higher than those associated with the MSOA of South Staffordshire 007 and these have therefore been used for assessing the junctions within Wolverhampton where appropriate.

Table 8 – TEMPRO Growth Factors (Wolverhampton)

Years	Road Type	AM Growth Figure	PM Growth Figure
2022-2038	Principal	1.1226	1.1219

Committed Development

5.4.5 The traffic flows from the following committed developments have been taken into account where appropriate in the traffic modelling. These were taken from the TA prepared for the Logic 54 Featherstone planning application:

- Logic 54 Featherstone (20/01131/OUT);
- Wolverhampton Business Park (11/00100/OUT);
- Four Ashes (16/00498/FUL);
- i54 unoccupied and i54 Western Extension (18/00637/OUT);
- Pendeford Mill Lane Bilbrook (18/00710/FUL);
- Hobnock Road (18/00450/REM);
- Unit 1 Innovation Drive, Pendeford (16/001057/REM); and
- West Midland Interchange (WMI) (DCO Ref TR050005).



Infrastructure

5.4.6 Given the recent consent for the M54/M6 Link Road, the scheme will be treated as committed infrastructure within the assessment, and the impact of the scheme on the strategic road network accounted for where appropriate.

5.4.7 Alongside the M54/M6 Link Road impact, the reassignment of traffic associated with the committed Logic 54 Featherstone Link Road has been taken into account.

5.5 Cumulative Impact

5.5.1 For the strategic road network, the cumulative impact of all of the proposed strategic site allocations has been assessed in accordance with the methodology set out in PJA Technical Note dated 11th May 2022. This is set out in a separate report assessing the impact of the proposed strategic allocations on the strategic road network.

5.6 Site Access Assessments

1. New Link Road – Southern Access

5.6.1 The operation of the southern access onto the new A449 link road was assessed using the PICADY module within Junctions 10. The results of the assessment are copied below in **Table 9**.

Table 9 – New Link Road (Southern Access)

	AM							PM						
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity
	2038 + DEV													
Stream B-C	D3	0.3	7.21	0.26	A	1.64	65 %	D4	0.3	7.31	0.21	A	2.21	60 %
Stream B-A		0.1	12.34	0.06	B				0.1	12.84	0.05	B		
Stream C-AB		0.2	6.43	0.20	A				0.5	8.29	0.33	A		
						[Stream B-A]								[Stream B-A]

5.6.2 The analysis demonstrates that the site access would operate within capacity in the future with the proposed development.



2. New Link Road – Northern Access

5.6.3 The operation of the northern access onto the A449 new link road was assessed using the PICADY module within Junctions 10. The results of the assessment are copied below in **Table 10**.

Table 10 – New Link Road (Northern Access)

	AM							PM						
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity
2038 + DEV														
Stream B-C	D3	0.0	8.72	0.04	A	0.78	31 % [Stream B-A]	D4	0.0	7.40	0.03	A	0.57	52 % [Stream B-A]
Stream B-A		0.3	16.32	0.21	C				0.2	13.09	0.14	B		
Stream C-AB		0.0	7.40	0.02	A				0.0	6.62	0.03	A		

5.6.4 The analysis demonstrates that the site access would operate within capacity in the future with the proposed development.

3. Brinsford Lane – Southern Access

5.6.5 The operation of the southern access onto Brinsford Lane was assessed using the PICADY module within Junctions 10. The results of the assessment are copied below in **Table 11**.

Table 11 – Brinsford Lane (Southern Access)

	AM							PM						
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity
2038 + DEV														
Stream B-AC	D3	0.0	0.00	0.00	A	0.09	634 % [Stream C-B]	D4	0.0	0.00	0.00	A	0.27	900 %
Stream C-B		0.0	6.16	0.01	A				0.0	5.84	0.01	A		

5.6.6 The analysis demonstrates that the site access would operate within capacity in the future with the proposed development.

4. Brinsford Lane – Northern Access

5.6.7 The operation of the northern access onto Brinsford Lane was assessed using the PICADY module within Junctions 10. The results of the assessment are copied below in **Table 12**.



Table 12 – Brinsford Lane (Northern Access)

	AM							PM						
	Set ID	Q (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Res Cap	Set ID	Q (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Res Cap
2038 + DEV														
Stream B-AC	D3	0.2	8.10	0.20	A	2.78	196 %	D4	0.2	7.20	0.14	A	3.29	333 %
Stream C-B		0.0	6.37	0.04	A		[Stream B-AC]		0.1	6.15	0.06	A		[Stream B-AC]

5.6.8 The analysis demonstrates that the site access would operate within capacity in the future with the proposed development.

5. New Road Access

5.6.9 The operation of the New Road access was assessed using the PICADY module within Junctions 10. The results of the assessment are copied below in **Table 13**.

Table 13 – New Road Access

	AM							PM						
	Set ID	Q (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Res Cap	Set ID	Q (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Res Cap
2038 + DEV														
Stream B-AC	D3	0.3	9.86	0.21	A	1.18	109 %	D4	0.2	9.29	0.16	A	1.02	129 %
Stream C-AB		0.0	5.25	0.01	A		[Stream B-AC]		0.0	5.57	0.02	A		[Stream B-AC]

5.6.10 The analysis demonstrates that the site access would operate within capacity in the future with the proposed development.

5.7 **Local Road Network Assessments**

6. Cat and Kittens Lane \ Greenfield Lane Junction

5.7.1 The operation of the Cat and Kittens Lane \ Greenfield Lane junction was assessed using the PICADY module within Junctions 10. The results of the assessment are copied below in **Table 14**.



Table 14 – Cat and Kittens Lane \ Greenfield Lane Assessment Results

	AM							PM						
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity
2022														
Stream B-C	D1	0.1	7.17	0.08	A	2.87	52 % [Stream B-A]	D2	0.1	8.24	0.12	A	4.00	29 % [Stream B-A]
Stream B-A		0.6	13.26	0.36	B				1.0	16.74	0.49	C		
Stream C-AB		0.3	5.42	0.14	A				0.3	5.60	0.14	A		
2038 Without Dev														
Stream B-C	D3	0.1	7.31	0.05	A	2.84	36 % [Stream B-A]	D4	0.0	8.85	0.02	A	5.91	6 % [Stream B-A]
Stream B-A		0.4	15.37	0.29	C				1.5	27.62	0.60	D		
Stream C-AB		1.0	6.76	0.35	A				1.5	7.89	0.46	A		
2038 + DEV														
Stream B-C	D7	0.1	7.55	0.05	A	2.93	27 % [Stream B-A]	D8	0.0	9.93	0.02	A	6.65	1 % [Stream B-A]
Stream B-A		0.5	17.15	0.31	C				1.8	34.22	0.65	D		
Stream C-AB		1.2	6.74	0.38	A				1.8	8.15	0.50	A		

5.7.2 The analysis demonstrates that the junction would operate within capacity in the future with the proposed development and that mitigation is not required. However, potential alterations to the junction have been considered following comments from CWC and this is discussed in **Chapter 6**.

7. Northcote Lane \ Legs Lane Roundabout

5.7.3 The operation of the Northcote Lane \ Legs Lane roundabout was assessed using the ARCADY module within Junctions 10. The results of the assessment are copied below in **Table 15**.

Table 15 – Northcote Lane \ Legs Lane Assessment Results

	AM							PM						
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity
2022														
1 - Northcote Lane (N)	D1	0.5	3.34	0.34	A	3.13	146 % [1 - Northcote Lane (N)]	D2	0.5	3.18	0.31	A	3.34	134 % [2 - Legs Lane (S)]
2 - Legs Lane (S)		0.3	2.96	0.25	A				0.6	3.53	0.38	A		
3 - Legs Lane (W)		0.2	2.96	0.19	A				0.2	3.22	0.20	A		
2038 Without Dev														
1 - Northcote Lane (N)	D3	0.6	3.60	0.38	A	3.45	121 % [1 - Northcote Lane (N)]	D4	0.7	3.78	0.42	A	3.82	101 % [2 - Legs Lane (S)]
2 - Legs Lane (S)		0.5	3.37	0.34	A				0.8	3.98	0.44	A		
3 - Legs Lane (W)		0.3	3.31	0.22	A				0.3	3.51	0.23	A		
2038 + DEV														
1 - Northcote Lane (N)	D7	0.7	3.87	0.42	A	3.66	102 % [1 - Northcote Lane (N)]	D8	0.8	4.00	0.45	A	4.01	92 % [2 - Legs Lane (S)]
2 - Legs Lane (S)		0.6	3.53	0.36	A				0.9	4.15	0.46	A		
3 - Legs Lane (W)		0.3	3.45	0.25	A				0.4	3.73	0.27	A		



5.7.4 The analysis demonstrates that the junction would operate within capacity in the future with the proposed development and that mitigation is not required.

8. Legs Lane \ Underhill Lane \ Bushbury Lane Mini Roundabout

5.7.5 The operation of the Legs Lane \ Underhill Lane \ Bushbury Lane Mini Roundabout was assessed using the PICADY module within Junctions 10. The results of the assessment are copied below in **Table 16**.

Table 16 – Legs Lane \ Underhill Lane \ Bushbury Lane Assessment Results

	AM							PM						
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity
2022														
1 - Legs Lane (N)	D1	1.2	7.01	0.55	A	9.91	23 %	D2	1.0	6.35	0.50	A	11.56	20 %
2 - Underhill Lane		1.8	15.13	0.64	C				2.1	16.15	0.68	C		
3 - Bushbury Lane		0.7	8.81	0.41	A				1.6	13.56	0.62	B		
2038 Without Dev														
1 - Legs Lane (N)	D3	1.7	8.35	0.62	A	24.33	-5 %	D4	2.0	9.46	0.68	A	19.17	2 %
2 - Underhill Lane		7.9	51.08	0.90	F				4.6	30.38	0.83	D		
3 - Bushbury Lane		1.1	11.93	0.52	B				2.8	21.36	0.74	C		
2038 + DEV														
1 - Legs Lane (N)	D7	2.1	9.65	0.67	A	37.36	-9 %	D8	2.3	10.85	0.70	B	26.10	-3 %
2 - Underhill Lane		13.8	87.29	0.95	F				7.0	44.88	0.88	E		
3 - Bushbury Lane		1.3	13.11	0.55	B				4.0	28.92	0.80	D		

5.7.6 The analysis demonstrates that the junction would be approaching capacity in the future without the proposal and that it would operate marginally worse as a result of the Cross Green development. An indicative mitigation scheme has therefore been considered and this is discussed further in **Chapter 6**.

9. Bushbury Lane \ Kempthorne Avenue \ Elston Hall Lane Roundabout

5.7.7 The operation of the Bushbury Lane \ Kempthorne Avenue \ Elston Hall Lane roundabout was assessed using the ARCADY module within Junctions 10. The results of the assessment are copied below in **Table 17**.



Table 17 – Bushbury Lane \ Kempthorne Avenue \ Elston Hall Lane Assessment Results

	AM							PM						
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity
2022														
1 - Bushberry Lane (N)	D1	1.4	8.47	0.57	A	6.10	40 % [1 - Bushberry Lane (N)]	D2	1.1	7.01	0.52	A	5.69	55 % [1 - Bushberry Lane (N)]
2 - Kempthorne Avenue		1.0	6.93	0.48	A				1.0	6.88	0.50	A		
3 - Bushberry Lane (S)		0.3	4.13	0.24	A				0.5	4.72	0.34	A		
4 - Elston Hall Lane		0.8	4.21	0.43	A				0.5	3.71	0.33	A		
2038 Without Dev														
1 - Bushberry Lane (N)	D3	2.0	11.02	0.66	B	7.44	25 % [1 - Bushberry Lane (N)]	D4	1.5	8.54	0.60	A	6.77	38 % [1 - Bushberry Lane (N)]
2 - Kempthorne Avenue		1.3	8.31	0.56	A				1.4	8.40	0.58	A		
3 - Bushberry Lane (S)		0.4	4.55	0.28	A				0.7	5.43	0.40	A		
4 - Elston Hall Lane		1.0	4.81	0.49	A				0.8	4.13	0.38	A		
2038 + DEV														
1 - Bushberry Lane (N)	D5	2.2	11.67	0.68	B	7.78	22 % [1 - Bushberry Lane (N)]	D6	1.7	9.14	0.62	A	7.20	34 % [1 - Bushberry Lane (N)]
2 - Kempthorne Avenue		1.4	8.66	0.57	A				1.6	9.01	0.61	A		
3 - Bushberry Lane (S)		0.4	4.61	0.28	A				0.7	5.58	0.41	A		
4 - Elston Hall Lane		1.0	4.88	0.49	A				0.7	4.21	0.39	A		

5.7.8 The analysis demonstrates that the junction would operate within capacity in the future with the proposed development and that mitigation is not required.

10. Broadlands \ Stafford Road Traffic Signal Controlled Junction

5.7.9 The operation of the Broadlands \ Stafford Road traffic signal controlled junction was assessed using LinSig. The results of the assessment are copied below in **Table 18**, which presents the results for the links with the highest Degree of Saturation (DoS).

Table 18 – Broadlands \ Stafford Road Assessment Results

Arm	AM Peak		PM Peak	
	DoS	Queue	DoS	Queue
	2022 Existing			
Stafford Road (North)	57.6	9	56.1	8
Broadlands	56.8	4	65.0	6
Stafford Road (South)	57.3	11	65.2	13
2038 without Development				
Stafford Road (North)	61.5	10	64.9	12
Broadlands	75.7	6	82.3	8
Stafford Road (South)	74.8	18	81.1	20
2038 with Development				
Stafford Road (North)	64.2	11	67.1	13
Broadlands	75.7	6	82.3	8
Stafford Road (South)	77.6	19	85.9	23



5.7.10 The analysis demonstrates that the junction would operate within capacity in the future with the proposed development and that mitigation is not required.

11. Springfield Lane \ Stafford Road Traffic Signal Controlled Junction

5.7.11 The operation of the Springfield Lane \ Stafford Road traffic signal controlled junction was assessed using LinSig. The results of the assessment are copied below in **Table 19**, which presents the results for the links with the highest Degree of Saturation (DoS).

Table 19 – Springfield Lane \ Stafford Road Traffic Signal Controlled Junction

Arm	AM Peak		PM Peak	
	DoS	Queue	DoS	Queue
2022 Existing				
Stafford Road (North)	70.3	8	66.7	23
Springfield Lane	67.0	7	59.0	6
Stafford Road (South)	59.0	19	66.4	13
Employment Access	4.9	1	66.8	8
2038 without Development				
Stafford Road (North)	84.9	38	87.2	42
Springfield Lane	83.8	9	73.8	7
Stafford Road (South)	77.9	32	83.0	19
Employment Access	6.2	1	83.5	9
2038 with Development				
Stafford Road (North)	88.7	43	88.7	44
Springfield Lane	83.8	9	78.7	8
Stafford Road (South)	79.8	34	90.6	17
Employment Access	6.2	1	89.1	10

5.7.12 The analysis demonstrates that the junction would be approaching capacity in the future with the proposed development and that mitigation is not required.

12. Bushbury Lane \ Stafford Road Roundabout

5.7.13 The operation of the Bushbury Lane Stafford Road roundabout was assessed using the ARCADY module within Junctions 10. The results of the assessment are copied below in **Table 20**.



Table 20 – Bushbury Lane \ Stafford Road Roundabout

	AM							PM						
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity
2022														
1 - A449 Stafford Road (N)	D1	3.1	7.07	0.75	A	7.56	11 %	D2	1.5	4.44	0.60	A	11.02	7 %
2 - Bushberry Lane		2.2	13.87	0.67	B				3.1	14.50	0.75	B		
3 - A449 Stafford Road (S)		2.9	5.97	0.73	A				7.7	13.73	0.88	B		
2038 Without Dev														
1 - A449 Stafford Road (N)	D3	6.5	12.94	0.86	B	14.82	0 %	D4	3.2	7.32	0.76	A	62.52	-4 %
2 - Bushberry Lane		4.9	31.81	0.83	D				16.0	78.03	0.95	F		
3 - A449 Stafford Road (S)		6.8	11.82	0.87	B				60.6	95.19	1.00	F		
2038 + Dev														
1 - A449 Stafford Road (N)	D5	9.5	18.17	0.90	C	21.02	-3 %	D6	3.7	8.15	0.78	A	138.23	-7 %
2 - Bushberry Lane		8.5	56.55	0.90	F				36.8	175.44	1.01	F		
3 - A449 Stafford Road (S)		8.3	14.14	0.89	B				146.9	215.93	1.04	F		

5.7.14 The analysis demonstrates that the junction would be at capacity in the future without the proposed development and that the proposals for the Cross Green development would have a detrimental impact on junction operation. An indicative mitigation scheme has therefore been considered and this is discussed further in **Chapter 6**.

13. Underhill Lane \ Cannock Road Junction

5.7.15 The operation of the Cat and Kittens Lane \ Greenfield Lane junction was assessed using the PICADY module within Junctions 10. The results of the assessment are copied below in **Table 21**. A sensitivity test of this junction incorporating the traffic associated with a proposed allocation within the emerging Black Country Local Plan at Fallings Park for approximately 300 dwellings has been taken undertaken.



Table 21 – Underhill Lane \ Cannock Road Assessment Results

		AM						PM					
Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity
2022													
Stream B-CD	1.3	17.07	0.58	C	5.57	-7 % [Stream B-A]	D2	1.6	19.80	0.62	C	6.02	-6 % [Stream B-A]
Stream B-A	1.1	49.50	0.51	E			1.0	47.84	0.49	E			
Stream AB-CD	1.1	14.57	0.51	B			1.1	13.27	0.51	B			
Stream D-AB	1.2	17.43	0.55	C			0.9	14.90	0.49	B			
Stream D-C	0.1	32.94	0.13	D			0.4	34.61	0.27	D			
Stream CD-AB	1.3	12.85	0.53	B			1.6	15.47	0.59	C			
2038 Without Dev													
Stream B-CD	119.8	2685.06	2.48	F	392.03	-22 % [Stream B-A]	D4	163.4	4492.46	3.03	F	1343.85	-28 % [Stream B-A]
Stream B-A	44.5	2761.33	2.44	F			83.5	4533.14	3.02	F			
Stream AB-CD	1.1	14.80	0.51	B			0.7	11.74	0.41	B			
Stream D-AB	91.4	1608.68	1.59	F			113.3	10936.70	9.16	F			
Stream D-C	6.4	1997.51	1.47	F			20.0	11700.56	8.83	F			
Stream CD-AB	1.2	13.49	0.51	B			1.6	16.08	0.59	C			
2038 + DEV													
Stream B-CD	151.1	4568.55	3.29	F	850.47	-26 % [Stream B-A]	D6	181.2	6277.21	3.82	F	4340354.15	-30 % [Stream B-A]
Stream B-A	69.0	4634.45	3.26	F			101.8	6317.39	3.81	F			
Stream AB-CD	0.8	13.70	0.45	B			0.6	11.36	0.39	B			
Stream D-AB	121.4	4913.95	4.03	F			125.3	59999940.00	999999999.00	F			
Stream D-C	8.4	5795.65	3.73	F			22.1	59999940.00	999999999.00	F			
Stream CD-AB	1.2	13.60	0.51	B			1.6	16.23	0.59	C			
2038 Sensitivity													
Stream B-CD	207.6	59999940.00	999999999.00	F	10758799.08	-27 % [Stream B-A]	D8	237.0	59999940.00	999999999.00	F	11863662.75	-31 % [Stream B-A]
Stream B-A	93.6	59999940.00	999999999.00	F			129.6	59999940.00	999999999.00	F			
Stream AB-CD	0.8	13.81	0.43	B			0.5	10.94	0.35	B			
Stream D-AB	167.1	59999940.00	999999999.00	F			161.7	59999940.00	999999999.00	F			
Stream D-C	12.2	59999940.00	999999999.00	F			30.7	59999940.00	999999999.00	F			
Stream CD-AB	1.1	13.31	0.49	B			1.6	16.01	0.58	C			

5.7.16 The analysis demonstrates that the junction would be over capacity in the future without the proposed development. The proposals are forecast to generate an additional circa 40 two-way trips through the junctions during the peaks, equivalent to around a 1-2% increase in vehicle movements through the junction. This is demonstrated to have a disproportionate impact on the operation of the junction in terms of queuing and delay, which is a product of the junction already being overcapacity in the baseline position. Nevertheless, an indicative mitigation scheme for the junction has been identified and this is discussed further in **Chapter 6**.

14. B4156 \ Bognop Road Mini-Roundabout

5.7.17 It was requested by SCC that the impact of the development proposals on the B4156 / Bognop mini-roundabout be considered as part of the STA work. In traffic generation terms, the proposals for Cross Green are forecast to generate 12-13 two-way vehicle trips through the junction at peak times which is not significant and would be within the daily variation in traffic movements.



6.0 POTENTIAL MITIGATION WORKS

6.1 Introduction

6.1.1 Following the assessment of development impact discussed in **Chapter 5**, highway mitigation measures have been identified at three junctions, including:

- Legs Lane \ Underhill Lane \ Bushbury Lane Mini Roundabout
- Bushbury Lane \ Stafford Road Roundabout
- Underhill Lane \ Cannock Road Junction

6.1.2 These are discussed in turn below. Additionally, consideration is given as to how the Cat and Kittens Lane \ Greenfield Lane junction could potentially be altered in order to address comments received from CWC.

6.2 Legs Lane \ Underhill Lane \ Bushbury Lane Mini Roundabout

6.2.1 As set out in **Chapter 5**, this junction is forecast to be approaching capacity in the future without the proposal and that it would operate marginally worse as a result of the Cross Green development. An indicative mitigation scheme has therefore been identified and this is sketched on **Drawing 23199-J8** and includes some minor widening works on the Underhill Lane approach.

6.2.2 Updated modelling has been undertaken and the results of this assessment are presented in **Table 22** below. This shows that the works would fully mitigate the impact of the development proposals.

Table 22 – Legs Lane \ Underhill Lane \ Bushbury Lane Mitigation Results

	AM							PM						
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity
2038 + DEV														
1 - Legs Lane (N)	D7	2.1	9.65	0.67	A	17.39	2 %	D8	2.3	10.65	0.70	B	18.89	3 %
2 - Underhill Lane		4.8	29.81	0.83	D		[2 - Underhill Lane]		3.4	21.33	0.78	C		[3 - Bushbury Lane]
3 - Bushbury Lane		1.3	13.20	0.55	B				4.0	29.02	0.81	D		



6.3 Bushbury Lane \ Stafford Road Roundabout

6.3.1 As set out in **Chapter 5**, this junction is forecast to be approaching capacity in the future without the proposed development and that the proposals for the Cross Green development would have a detrimental impact on junction operation. An indicative mitigation scheme has therefore been identified and this is sketched on **Drawing 23199-12-GAB** and includes the following works:

- Widening to the north of Bushbury Lane to create a two lane entry with extended flare;
- Localised widening to the south of Bushbury Lane and amendment of the splitter island geometry; and
- South to north bypass lane to be provided through road markings only.

6.3.2 Updated modelling has been undertaken using the ARCADY module in Junctions 10 and the results of this assessment are presented in **Table 23** below. This shows that the works would fully mitigate the impact of the development proposals.

Table 23 – Bushbury Lane\ Stafford Road Mitigation Results

	AM							PM						
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Network Residual Capacity
2038 + Dev														
1 - A449 Stafford Road (N)	D5	9.5	18.18	0.90	C	11.90	4 %	D6	3.9	8.50	0.79	A	8.94	6 %
2 - Bushberry Lane		2.2	13.95	0.67	B		[1 - A449 Stafford Road (N)]		3.6	16.84	0.78	C		[2 - Bushberry Lane]
3 - A449 Stafford Road (S)		1.0	5.73	0.48	A				1.2	6.71	0.55	A		

6.3.3 CWC has stated that they are looking into wider improvements to the A449 corridor and that a financial contribution to wider improvements (equivalent to the cost of the proposals indicated) would be considered appropriate at this location.



6.4 Underhill Lane \ Cannock Road Junction

- 6.4.1 As set out in **Chapter 5**, this junction is forecast to be over capacity in the future without the proposed development and that the proposals for the Cross Green development would have a detrimental impact on junction operation.
- 6.4.2 Initial options have focused on the Underhill Lane junction as this location directly relates to the development demand. By changing the junction type to a mini-roundabout (or indeed traffic signal junction) there will both be an increase in capacity but the ease of making the right turn would also increase. This is likely to relieve Belton Road of some of the existing demand it carries, as it would revert to Pear Tree Lane. On this basis, there would be less rationale for changing Belton Road although there is a risk of blocking back from Belton Road impairing Underhill Lane.
- 6.4.3 Following comments received from CWC, the appraisal has been broadened to consider how best to adapt both junctions. The two favoured options, in this scenario, are to change the layouts to signalisation or mini-roundabouts which in both instances would give greater priority to the minor arms. In both cases, widening on the approaches would be required to achieve greater give-way line capacity or more stacking space on the approaches and this can be achieved within the adopted highway.
- 6.4.4 The signal option is shown on **Drawing 23199-17-GA** and the summary results of a LinSig assessment for this junction are set out in **Table 24**. This demonstrates that a signalisation scheme could fully mitigate the impact of the development proposals on this junction.

Table 24 – Underhill Lane\Cannock Road Mitigation Results (LinSig)

Arm	AM Peak		PM Peak	
	DoS	Queue	DoS	Queue
	2038 Sensitivity			
Cannock Road (SB int)	63	5	67	6
Cannock Road (NB ext)	67	7	81	12
Underhill Lane	77	6	79	7
Belton Road	76	6	71	6
Cannock Road (NB int)	53	5	63	6
Cannock Road (SB ext)	79	13	66	9



- 6.4.5 The signal option has the advantage that the existing puffin crossing could be incorporated directly into the junction. Given the pattern of demand and close spacing of the minor arms, the minor arms either need to run independently or better still together. To run together would require the ability to control the minor road right turn out, i.e., ideally left turn filter would be available on the minor arms. This is possible on Underhill Lane but constrained on Belton Road by the service road. As a compromise it is envisaged that the Cannock Road arms would be called together, followed by Belton Road with a left turn filter on Underhill Lane, followed by Underhill Lane.
- 6.4.6 The mini roundabout option is shown on **Drawing 23199-13C-GA** and the summary results of the ARCADY assessment are set out in **Table 25**. This demonstrates that a mini roundabout scheme could fully mitigate the impact of the development proposals on this junction.

Table 25 – Underhill Lane\ Cannock Road Mitigation Results (ARCADY)

Arm	AM Peak (2038 design)			PM Peak (2038 design)		
	Queue (pcu)	Delay (s)	RFC (%)	Queue (pcu)	Delay (s)	RFC (%)
Cannock Road (SB int)	-	35.35	0.99	-	16.33	0.84
Cannock Road (NB ext)	4	16.45	0.79	8	30.94	0.89
Underhill Lane	2	17.54	0.69	6	46.47	0.88
Belton Road	6	73.16	0.87	2	27.40	0.70
Cannock Road (NB int)	-	3.89	0.48	-	4.83	0.58
Cannock Road (SB ext)	9	36.31	0.90	3	14.24	0.74

- 6.4.7 As a mini-roundabout, there is no entry deflection in a formal sense. Rather than positioning the roundabout fully online with a larger splitter island, i.e., with widening to the eastern side, a lateral deflection is proposed in line with the guidance in CD116. This lateral deflection improves the legibility of the junction and slows traffic on approach. The deflection can be increased or works e.g., a further splitter could be introduced upstream, however the issue is improved by the conversion of both junctions to mini-roundabout layouts as shown on **Drawing 23199-13C-GA**.



6.4.8 Given that the scale of works for the mini-roundabout improvement or the signal improvement schemes are similar, it is considered at this stage that there are no reasons precluding either option (noting that the junction is overcapacity in the base and the contribution in demand terms from future development is modest).

6.5 **Cat and Kittens Lane \ Greenfield Lane Junction**

6.5.1 In comments provided by CWC it was stated that the nature of the Cat and Kittens Lane \ Greenfield Lane junction does nothing to discourage rat-running to and from the south via Cat and Kittens Lane. It was therefore suggested that alterations to the junction and associated speed reduction measures should be considered to discourage the use of this route to access/egress the development.

6.5.2 Some alternative junction arrangements have therefore been reviewed at a high level at this stage, including changing the priority at the junction and converting the exiting T-junction to a mini-roundabout. Both of these options are likely to reduce the capacity of the existing junction as the dominant movement in traffic terms is along Cat and Kittens Lane.

6.5.3 The details of any scheme to change the form of the junction as well any associated traffic calming works would be the subject of a future planning application submission and associated capacity modelling.

6.6 **Summary**

6.6.1 Overall, the analysis demonstrates that the impact of the development proposals on the operation of the local highway network can be accommodated with the mitigation works proposed. These would be subject to a more detailed review and analysis at the planning application stage. A summary of the assessment results is provided in **Table 26**.



Table 26 – Junction Assessment Results Summary

Junction	Operation in 2038 without Dev	Operation in 2038 with Dev	Mitigation Required?	Operation with Mitigation
1. New Link Road – Southern Access	-	Within Capacity (highest RFC of 0.33 and Q of 1)	-	-
2. New Link Road – Northern Access	-	Within Capacity (highest RFC of 0.21 and Q of 0)	-	-
3. Brinsford Lane – Southern Access	-	Within Capacity (highest RFC of 0.01 and Q of 0)	-	-
4. Brinsford Lane – Northern Access	-	Within Capacity (highest RFC of 0.20 and Q of 0)	-	-
5. New Road Access	-	Within Capacity (highest RFC of 0.21 and Q of 0)	-	-
6. Cat and Kittens Lane/ Greenfield Lane	Within Capacity (highest RFC of 0.60 and Q of 2)	Within Capacity (highest RFC of 0.65 and Q of 2)	N	-
7. Cat and Kittens Lane / Northcote Lane / Legs Lane	Within Capacity (highest RFC of 0.44 and Q of 1)	Within Capacity (highest RFC of 0.46 and Q of 1)	N	-
8. Northcote Lane / Bushbury Lane	Within Capacity (highest RFC of 0.90 and Q of 8)	Approaching Capacity (highest RFC of 0.95 and Q of 14)	Y	Within Capacity (highest RFC of 0.83 highest Q of 5)
9. Bushbury Lane \ Kempthorne Avenue \ Elston Hall Lane Roundabout	Within Capacity (highest RFC of 0.66 and Q of 2)	Within Capacity (highest RFC of 0.68 and Q of 2)	N	-
10. Broadlands \ Stafford Road Traffic Signal Controlled Junction	Within Capacity (highest DoS of 82.3% and Q of 8)	Approaching Capacity (highest DoS of 85.9% and Q of 23)	N	-
11. Springfield Lane \ Stafford Road Traffic Signal Controlled Junction	Approaching Capacity (highest DoS of 87.2% and Q of 42)	Approaching Capacity (highest DoS of 90.6% and Q of 17)	N	-
12. Bushbury Lane \ Stafford Road Roundabout	Over Capacity (highest RFC of 1.00 and Q of 61)	Over Capacity (highest RFC of 1.04 and Q of 147)	Y	Approaching Capacity (highest RFC of 0.90 and Q of 10)
13. Underhill Lane \ Cannock Road Junction	Over Capacity (highest RFC of 3.29 and Q of 208)	Over Capacity (highest RFC of **** and Q of 237)	Y	Within capacity (highest DoS of 81% and Q of 13) / Approaching capacity (highest RFC of 0.99 and Q of 9)



7.0 CONCLUSIONS

7.1 DTA Transportation Limited has been commissioned on behalf of Taylor Wimpey to provide transport advice in relation to the proposed allocation of Land at Cross Green for residential development within the emerging South Staffordshire Local Plan.

7.2 This Strategic Transport Assessment has been prepared following discussions with South Staffordshire Council, Staffordshire County Council, the City of Wolverhampton Council and National Highways. It provides a high level strategic review of the impact of the proposed site allocation within the emerging Local Plan and focusses on deliverability. A more detailed TA would be required at the planning application stage.

7.3 The pertinent paragraphs from the National Planning Policy Framework in relation to the transport evidence base are set out below:

Para 104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

a) the potential impacts of development on transport networks can be addressed;

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

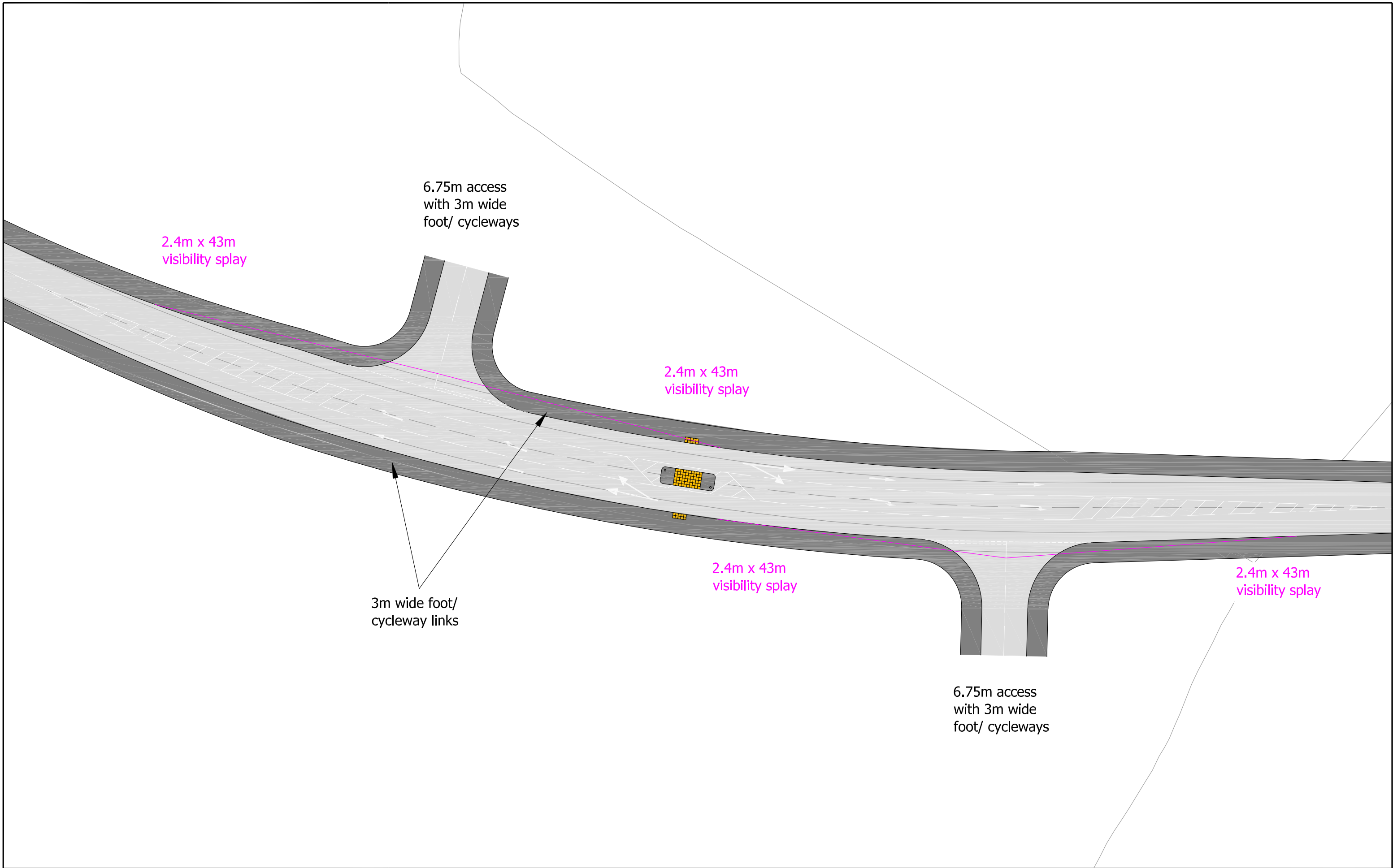
e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

Para 105. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.



- 7.4 In terms of sustainable accessibility, the site is well located to take advantage of existing foot, cycle and public transport services in the local area. Opportunities for maximising connectivity between the proposed development and the local area are discussed in this report and detailed schemes would be developed in conjunction with the local highway authorities at the planning application stage.
- 7.5 At this stage, it is proposed that primary vehicle access to the site is to be taken from the new A449 link road proposed as part of the ROF Featherstone scheme. Secondary points of vehicle access are proposed onto Brinsford Lane and New Road. Separate pedestrian/ cycle access points are also proposed, which will form part of a pedestrian and cycle priority route through the site. The exact form of the accesses and their locations would need to be agreed at the planning application stage as part of a detailed Transport Assessment.
- 7.6 As part of this preliminary work, an assessment of the impact of the development proposals on the operation of the highway network has been undertaken. Mitigation works have been identified at a number of locations for the purposes of deriving indicative costs to inform the viability assessment of the emerging Local Plan. Further detailed analysis of impact would be required in the future should the site be brought forward through planning.

DRAWINGS



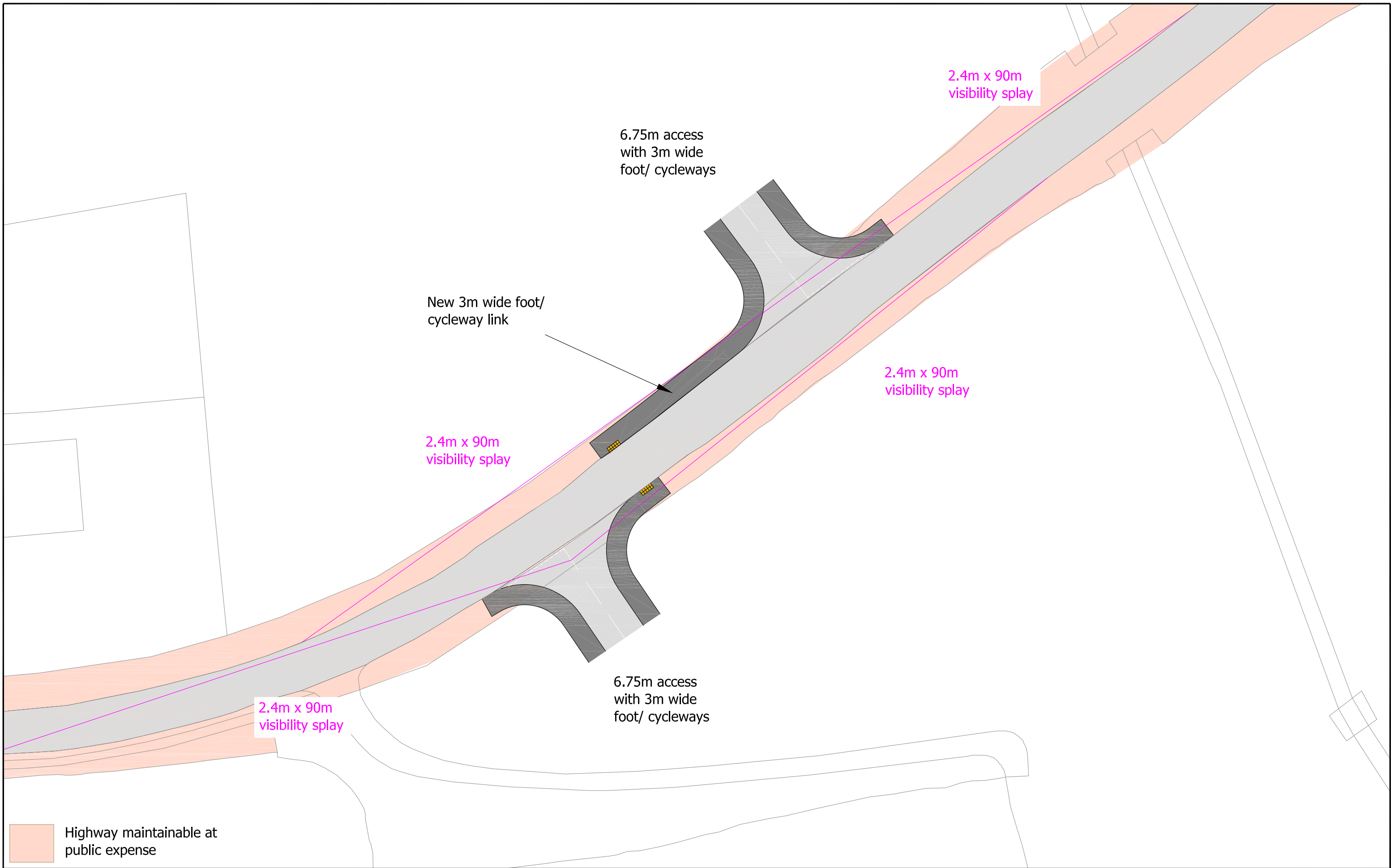
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JOB TITLE Featherstone, Staffordshire		CLIENT Taylor Wimpey	
DRAWING TITLE Indicative Site Access Arrangements New Link Road			
SCALE 1/500@A3	DRAWN BY BP	DATE June21	DRAWING No 23199-01
			REVISION B



Highway maintainable at public expense

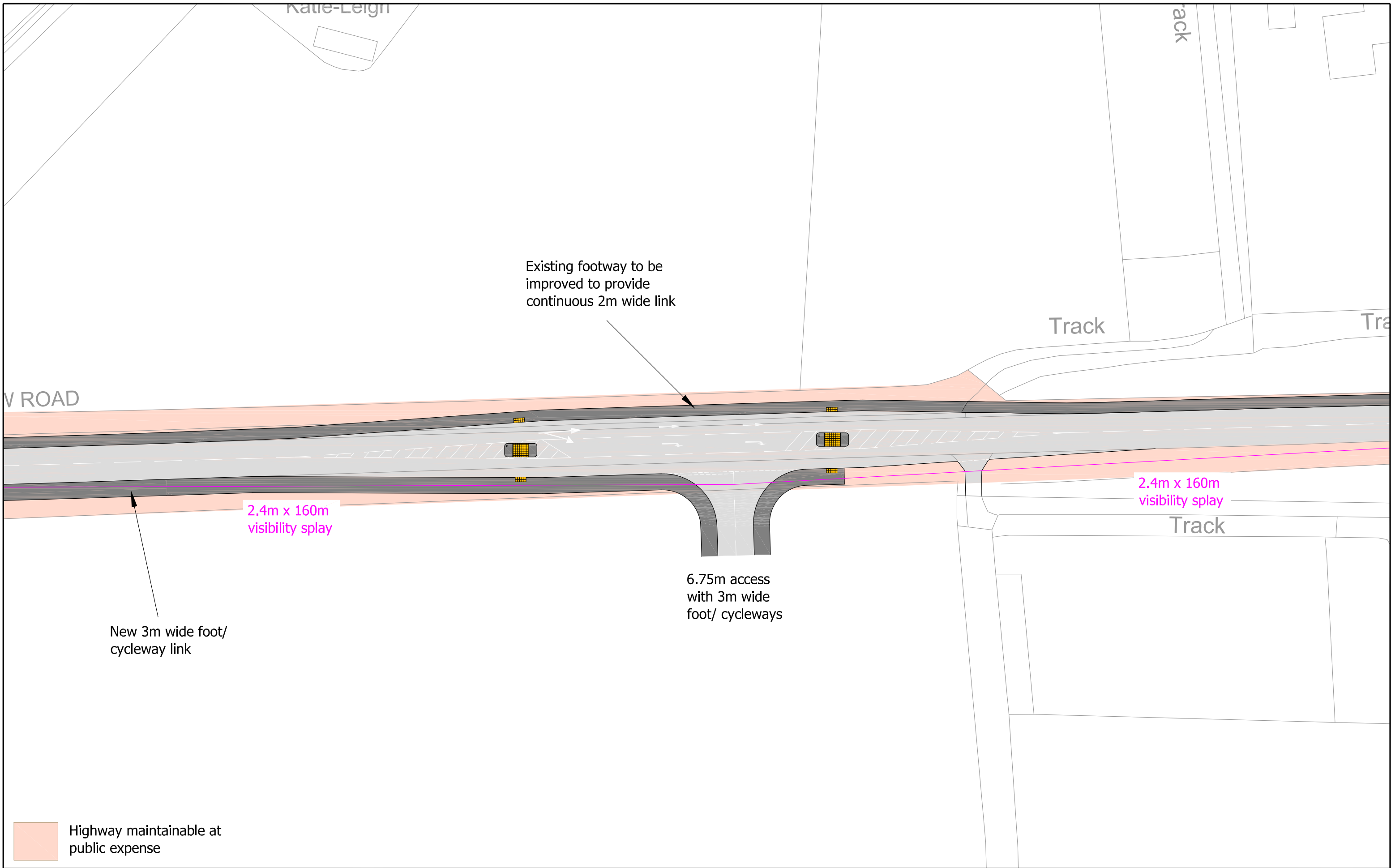
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JOB TITLE Featherstone, Staffordshire		CLIENT Taylor Wimpey	
DRAWING TITLE Indicative Site Access Arrangements Brinsford Lane			
SCALE 1/500@A3	DRAWN BY BP	DATE June21	DRAWING No 23199-01-2
			REVISION B



 Highway maintainable at public expense

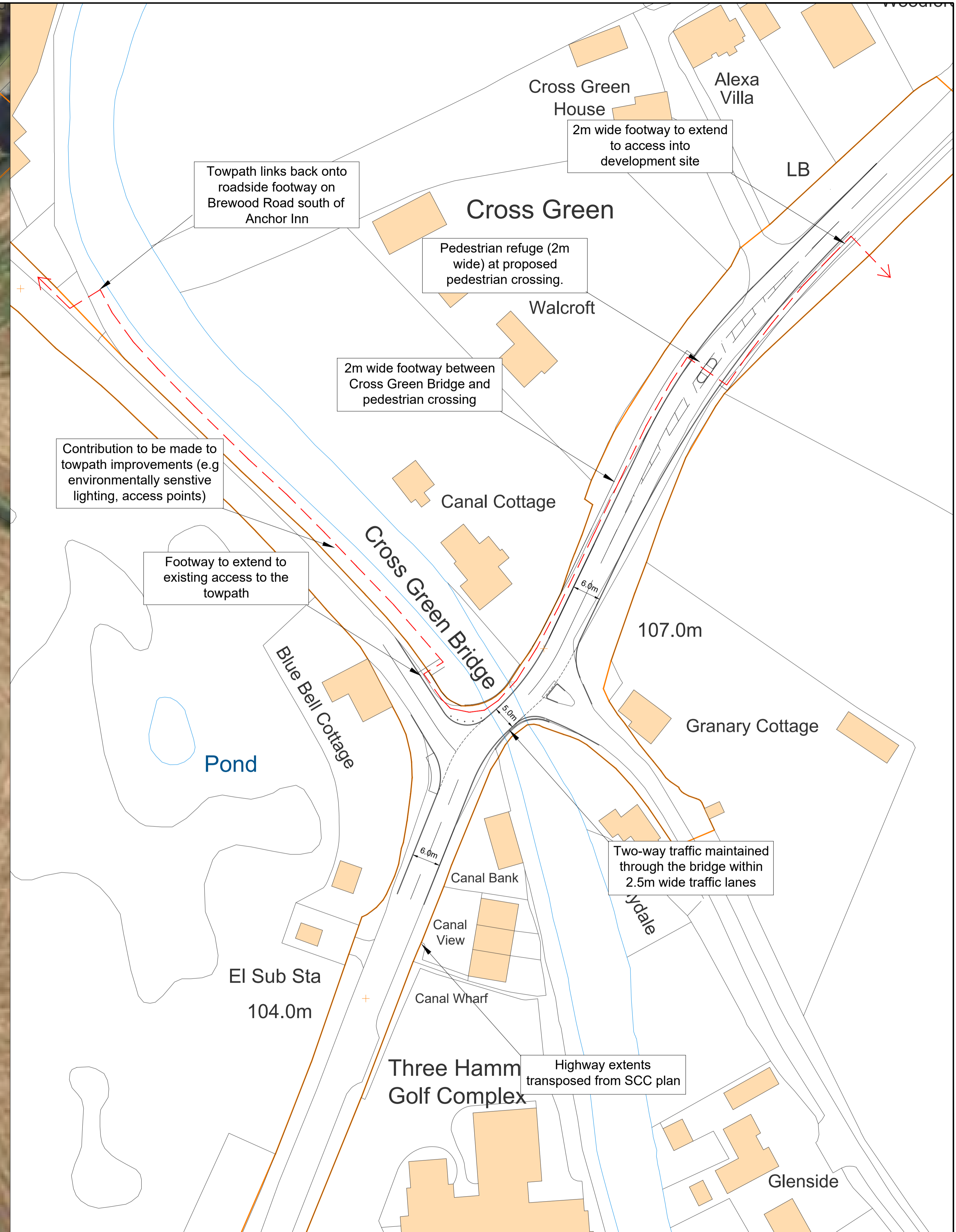
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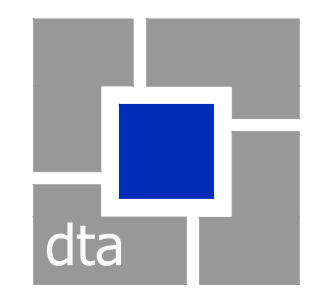
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DRAWING TITLE Indicative Site Access Arrangements New Road			
SCALE 1/500@A3	DRAWN BY BP	DATE June21	DRAWING No 23199-01-3
REVISION B			



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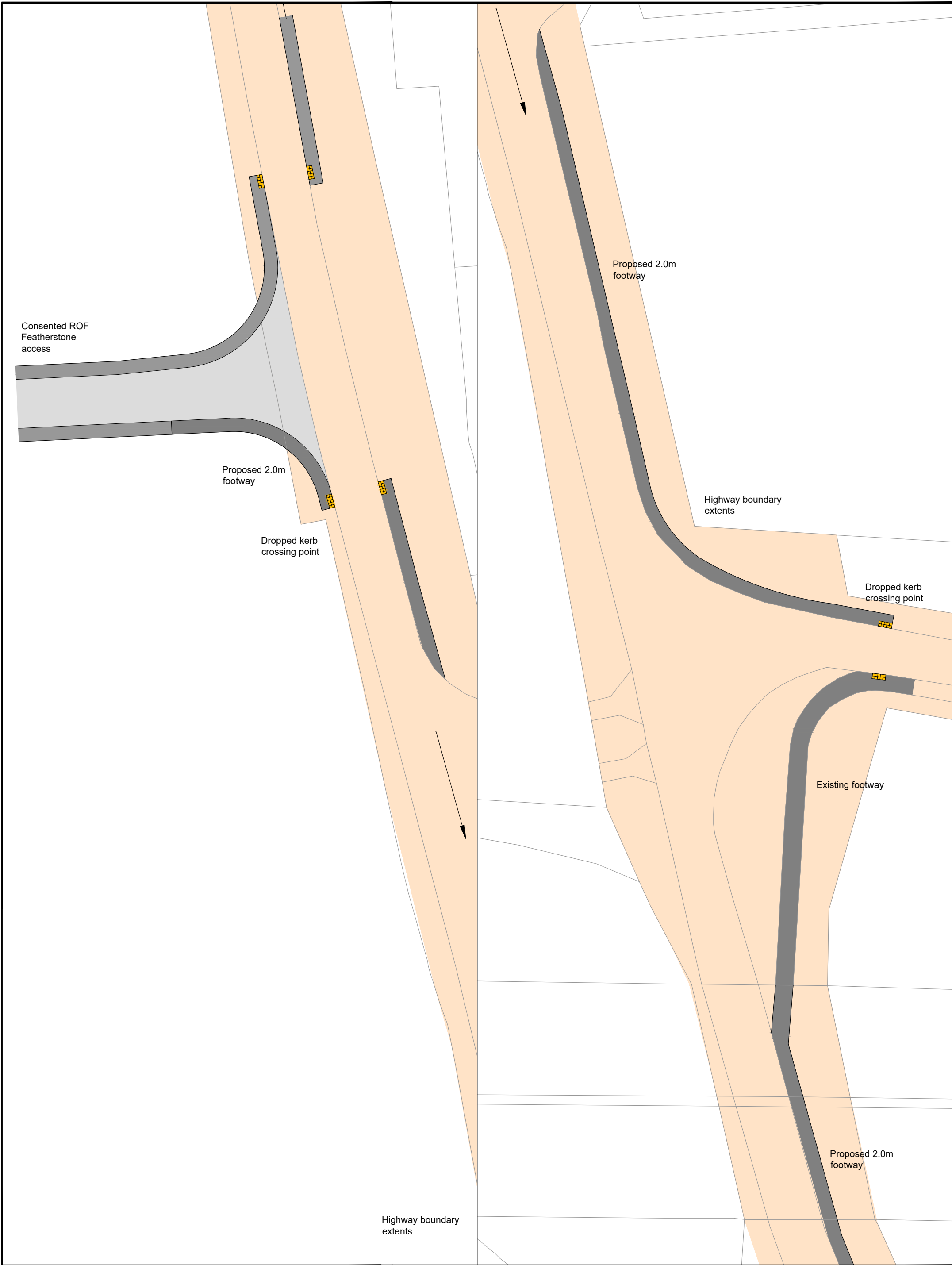
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DRAWING TITLE							
CROSS GREEN BRIDGE INDICATIVE ACTIVE TRAVEL IMPROVEMENTS GENERAL ARRANGEMENT							
SCALE	DRAWN BY	DATE	DRAWING No	REVISION			
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Tel: +44(0)1564 793598
Fax: +44(0)1564 793983
www.dtatransportation.co.uk

JOB TITLE Featherstone, Staffordshire		CLIENT Taylor Wimpey	
DRAWING TITLE Indicative Footway Scheme Cat & Kittens Lane			
SCALE 1/500@A3	DRAWN BY BP	DATE 28-09-22	DRAWING No 23199-14
			REVISION

CAT AND KITTENS LANE

Highway boundary extents

Proposed 2.0m footway

Highway boundary extents

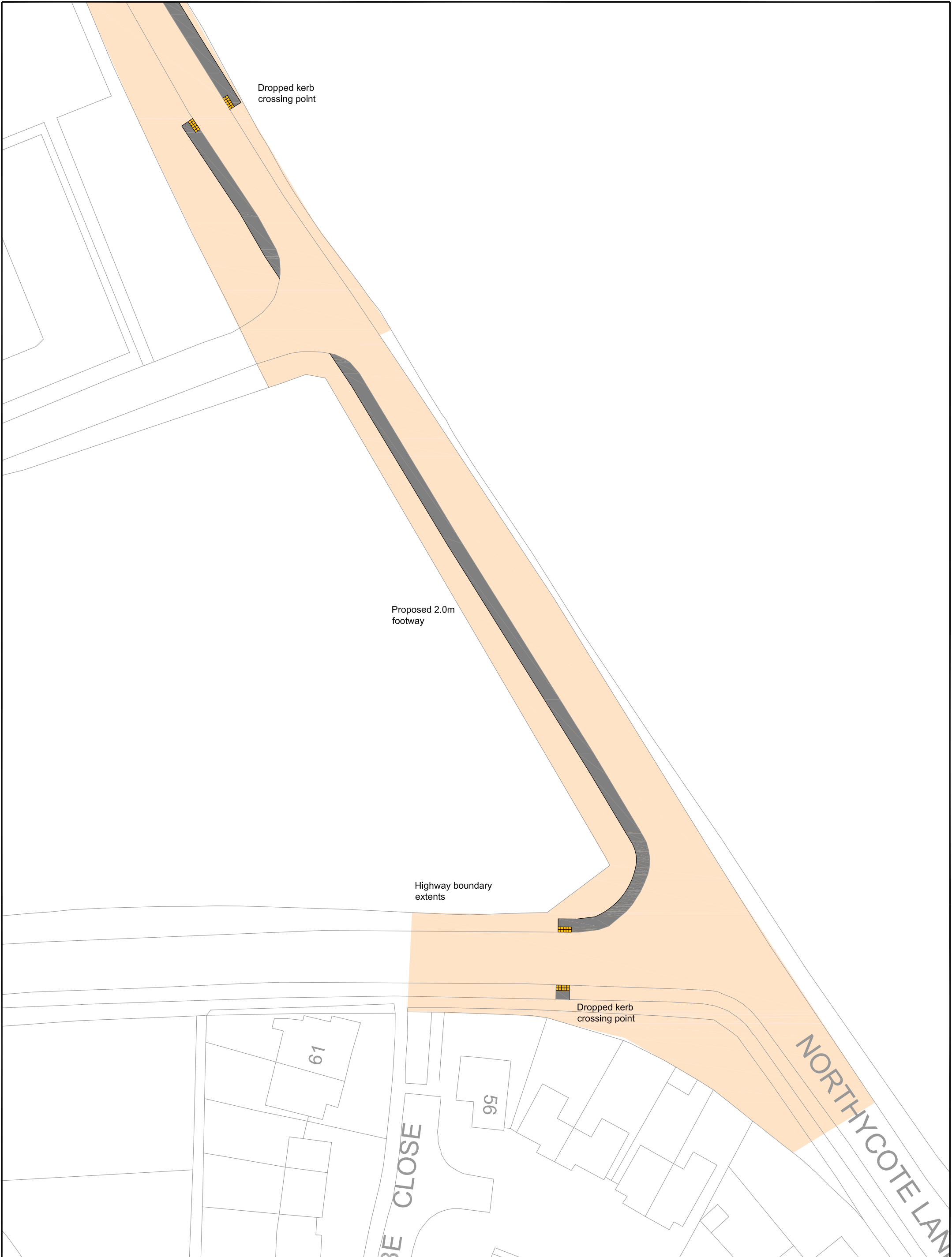
Proposed 2.0m footway

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JOB TITLE		Featherstone, Staffordshire		CLIENT		Taylor Wimpey	
DRAWING TITLE							Indicative Footway Scheme Cat & Kittens Lane
SCALE	DRAWN BY	DATE	DRAWING No	REVISION			
1/500@A3	BP	28-09-22	23199-14-2				



Dropped kerb crossing point

Proposed 2.0m footway

Highway boundary extents

Dropped kerb crossing point

61

56

BE CLOSE

NORTHYCOTE LANE

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JOB TITLE		Featherstone, Staffordshire		CLIENT		Taylor Wimpey	
DRAWING TITLE							
Indicative Footway Scheme Cat & Kittens Lane							
SCALE	DRAWN BY	DATE	DRAWING No	REVISION			
1/500@A3	BP	28-09-22	23199-14-3				



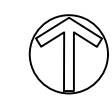
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REV	DESCRIPTION	DRAWN	INITIALS	DATE

DTA
 Transport Planning Consultants

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 Henley in Arden,
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 Tel: +44(0)1564 793598
 Fax: +44(0)1564 793983
 www.dtatransportation.co.uk

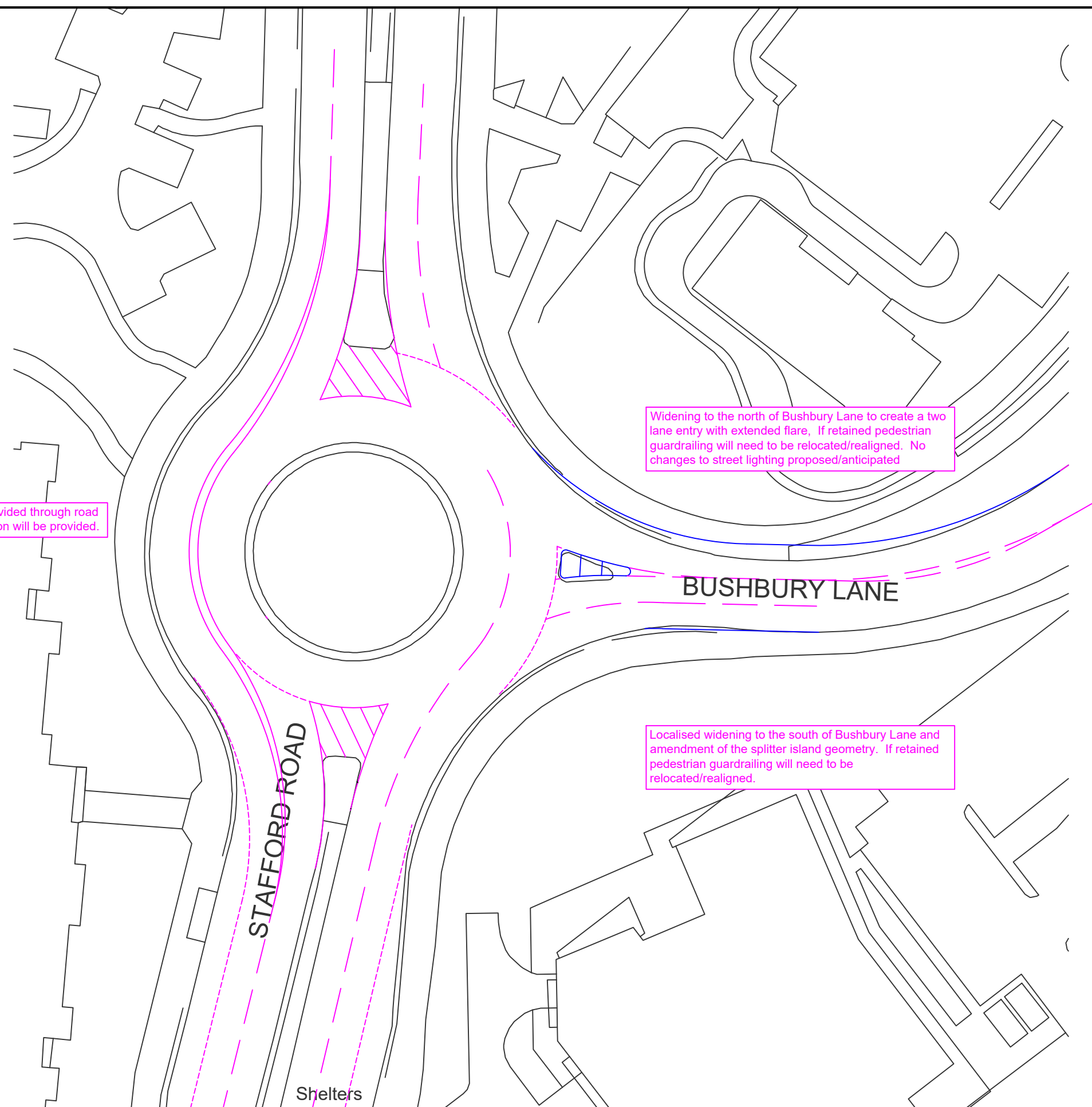
JOB TITLE Featherstone, Staffordshire		CLIENT Taylor Wimpey	
DRAWING TITLE Junction 8 Underhill Lane Improvements			
SCALE 1/500@A3	DRAWN BY BP	DATE 20-05-22	DRAWING No 23199-J8
			REVISION



South to north bypass lane to be provided through road markings only. No physical separation will be provided.

Widening to the north of Bushbury Lane to create a two lane entry with extended flare. If retained pedestrian guardrailling will need to be relocated/realigned. No changes to street lighting proposed/anticipated

Localised widening to the south of Bushbury Lane and amendment of the splitter island geometry. If retained pedestrian guardrailling will need to be relocated/realigned.



STAFFORD ROAD

BUSHBURY LANE

Shelters

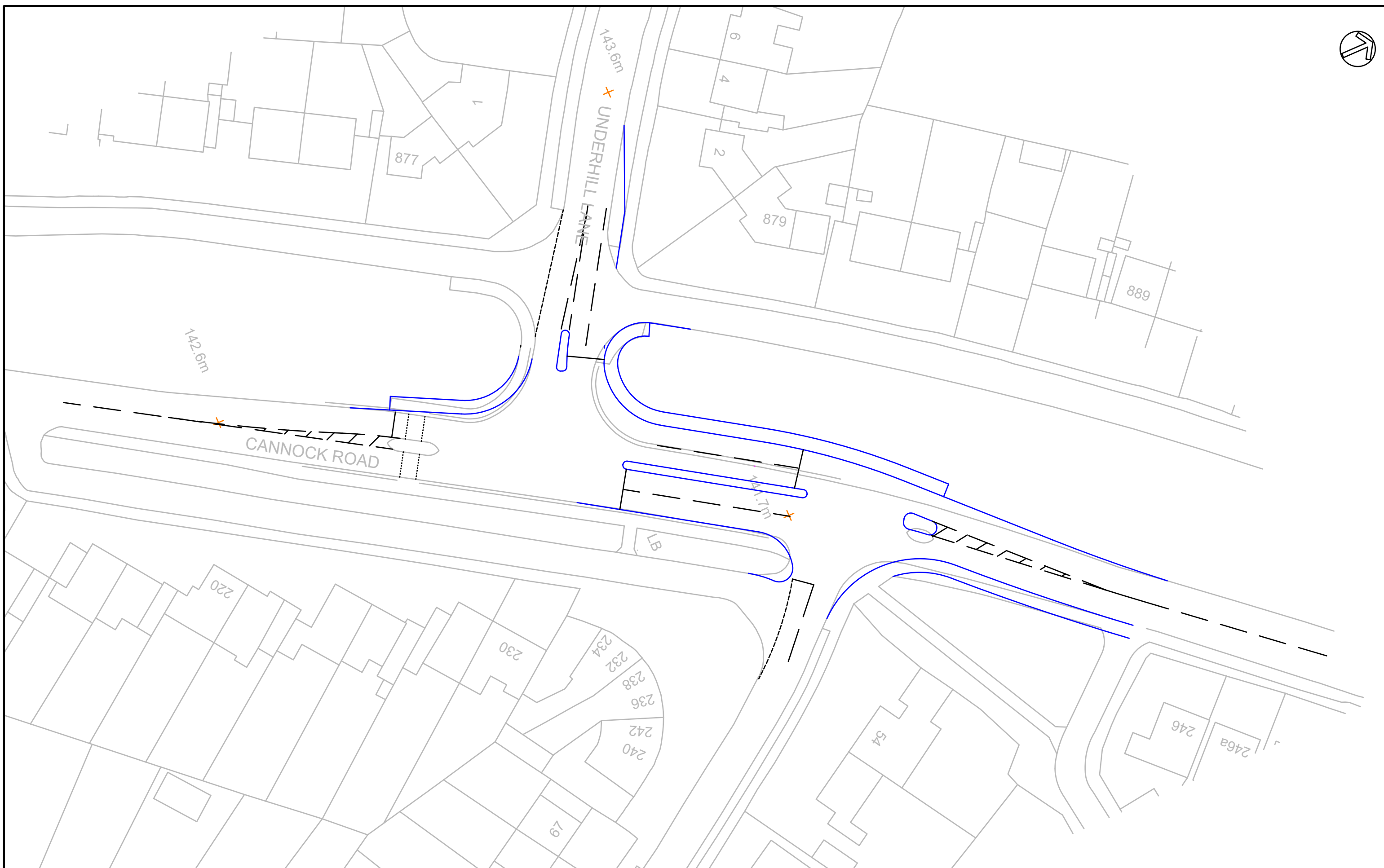
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REV	DESCRIPTION	DRAWN	INITIALS	DATE



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Fax: +44(0)1564 793983
www.dta-transportation.co.uk

JOB TITLE		CLIENT	
CROSS GREEN		TAYLOR WIMPEY	
DRAWING TITLE			
A449 Stafford Road – Bushbury Lane Roundabout Northbound bypass lane and extended flare on Bushbury Lane			
SCALE	DRAWN BY	DATE	DRAWING No
1:500@A3	RM	08/06/22	23199-12-GA
REVISION			B

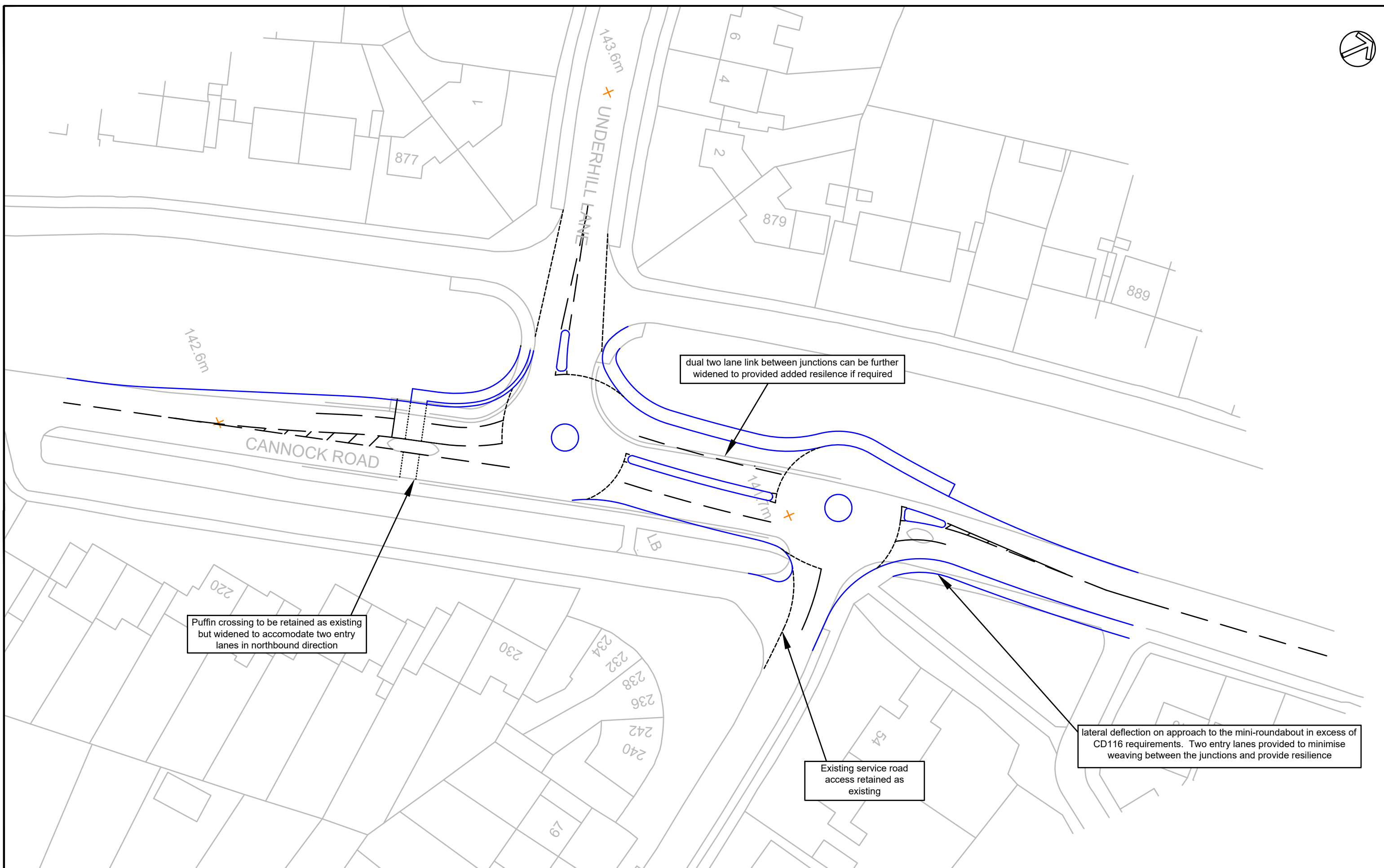


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REV	DESCRIPTION	DRAWN	INITIALS	DATE

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 Fax: +44(0)1564 793983
 www.dtatransportation.co.uk

JOB TITLE		CROSS GREEN		CLIENT		TAYLOR WIMPEY	
DRAWING TITLE							
A460 Cannock Road – Underhill Lane – Belton Road Proposed Signal layout							
SCALE	DRAWN BY	DATE	DRAWING No	REVISION			
1:500@A3	RM	04/11/22	23199-17-GA				



dual two lane link between junctions can be further widened to provided added resilience if required

Puffin crossing to be retained as existing but widened to accomodate two entry lanes in northbound direction

Existing service road access retained as existing

lateral deflection on approach to the mini-roundabout in excess of CD116 requirements. Two entry lanes provided to minimise weaving between the junctions and provide resilience

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JOB TITLE		CROSS GREEN		CLIENT		TAYLOR WIMPEY	
DRAWING TITLE							
A460 Cannock Road – Underhill Lane – Belton Road Proposed Mini-Roundabout layout							
SCALE	DRAWN BY	DATE	DRAWING No	REVISION			
1:500@A3	RM	04/11/22	23199-13-GA	C			

APPENDIX A

Illustrative Site Layout Plan



KEY

- SITE BOUNDARY (TBC)
63.76 HA
157.56 ACRES
- POTENTIAL SITE ACCESS
VIA BRINSFORD LANE, NEW ROAD AND
OLD STAFFORD ROAD
- PROPOSED HIGH DENSITY RESIDENTIAL
DEVELOPMENT PARCELS (50 DPH)
NDA 5.09 HA / 12.58 ACRES
UP TO 255 DWELLINGS (AT 50 DPH)
- PROPOSED MEDIUM DENSITY RESIDENTIAL
DEVELOPMENT PARCELS (40 DPH)
NDA 7.44 HA / 18.37 ACRES
UP TO 300 DWELLINGS (AT 40 DPH)
- PROPOSED LOW DENSITY RESIDENTIAL
DEVELOPMENT PARCELS (35 DPH)
NDA 18.1 HA / 44.79 ACRES
UP TO 435 DWELLINGS (AT 35 DPH)
- PROPOSED CENTRAL VILLAGE HUB
0.77 HA / 1.9 ACRES
- POTENTIAL LOCATION FOR PRIMARY SCHOOL
- 2.05 HA / 5.08 ACRES
- POTENTIAL PARKING FOR RAIL HALT
- 1.47 HA / 3.6 ACRES (UP TO 500 SPACES)
- POTENTIAL ROUNDABOUT ACCESS VIA
STAFFORD ROAD
- PROPOSED DISTRICT ROAD MOVEMENT
- PRIMARY MOVEMENT ROUTE
(INCORPORATING CYCLE AND PEDESTRIAN MOVEMENT)
- SECONDARY MOVEMENT ROUTE
- TERTIARY LINK ROAD MOVEMENT
- PRIVATE LANE MOVEMENT
- EXISTING RAIL MOVEMENT PROVIDING ACCESS TO
NEARBY URBAN CENTRES
- PROPOSED NEW RAIL HALT STOP
- POTENTIAL PEDESTRIAN CROSSING POINT (TBC)
- PUBLIC RIGHT OF WAYS
- POTENTIAL PEDESTRIAN ROUTES
WITHIN DEVELOPMENT
- EXISTING VEGETATION
- PROPOSED STRUCTURAL PLANTING PROVIDING
A REDUCTION IN ACOUSTIC DISTURBANCE
- PROPOSED WETLAND WOODLAND PLANTING
- ORNAMENTAL PLANTING
- COMMUNITY ORCHARD PLANTING
- NEIGHBOURHOOD EQUIPPED AREA OF PLAY
- LOCALLY EQUIPPED AREAS OF PLAY
- AREA OF NATURAL PLAY
- COMMUNITY TRIM TRAIL ROUTE
- COMMUNITY ALLOTMENT SPACES
- CONFIRMED EXTENTS OF FLOOD LINE
- SUSTAINABLE URBAN DRAINAGE (TBC)

KEY PRINCIPLES

1. POTENTIAL ACCESS VIA NEW ROUNDABOUT AND DISTRICT ROAD OFF EXISTING STAFFORD ROAD (A449);
2. POTENTIAL ACCESS VIA BRINSFORD LANE, NEW ROAD AND OLD STAFFORD ROAD;
3. PRIMARY RESIDENTIAL MOVEMENT PROVIDING GREEN FORMS OF MOVEMENT;
4. SECONDARY MOVEMENT ROUTES PROVIDING ACCESS TO LARGER PARCELS OF DEVELOPMENT;
5. TERTIARY MOVEMENT ROUTES PROVIDING ACCESS TO SMALLER CLUSTERS OF DEVELOPMENT
6. PRIVATE LANES WITH OUTWARD FACING DWELLINGS PROVIDING PASSIVE SURVEILLANCE OVER PROPOSED OPEN SPACE;
7. POTENTIAL LOCATION FOR PROPOSED PRIMARY SCHOOL;
8. POSSIBLE LOCATION FOR A CENTRAL VILLAGE HUB PROVIDING OPPORTUNITIES FOR RETAIL AND COMMUNITY USES;
9. NEWLY PROPOSED RAIL HALT STATION PROVIDING SUSTAINABLE FORMS OF MOVEMENT;
10. A SERIES OF LANDSCAPED COMMONS OFFERING LOCATIONS FOR EQUIPPED AREAS OF PLAY AND SPORTING PURSUITS;
11. NEWLY CREATED "CANALSIDE WALK" LINEAR PARK PROVIDING A LANDSCAPED BUFFER TO THE EXISTING CANAL NETWORK PROVIDING LEISURE AND SOCIAL OPPORTUNITIES FOR RESIDENTS;
12. COMMUNITY ALLOTMENTS TO BENEFIT NEW AND EXISTING RESIDENTS;
13. PLANTED COMMUNITY ORCHARD RETURNING THE AREA TO ITS HISTORIC LAND USE;
14. PROPOSED LOCATION FOR COMMUNITY TRIM TRAIL PROVIDING OPPORTUNITIES FOR COMMUNITY EXERCISE AND SOCIAL INCLUSION;
15. MAXIMUM RETENTION OF EXISTING VEGETATION AND ECOLOGY ON SITE;
16. WETLAND WOODLAND PLANTING AIDING BIO-DIVERSITY AND ECOLOGY ON SITE;
17. NEW STRUCTURAL WOODLAND PLANTING TO CREATE AN ACOUSTIC BARRIER TO EXISTING AND PROPOSED MOVEMENT INFRASTRUCTURE;
18. SERIES OF THEMED GREENWAYS HELPING TO RETAIN EXISTING ECOLOGY WITH OPPORTUNITIES FOR ENHANCED PLANTING AND OPEN EXPANSES OF AMENITY GREENSPACE;
19. MAXIMUM PROVISION FOR PEDESTRIAN MOVEMENT TO PROVIDE MAXIMUM PERMEABILITY THROUGHOUT THE DEVELOPMENT; AND
20. UTILISATION OF EXISTING SITE LOW POINTS FOR SUSTAINABLE URBAN DRAINAGE SOLUTIONS.

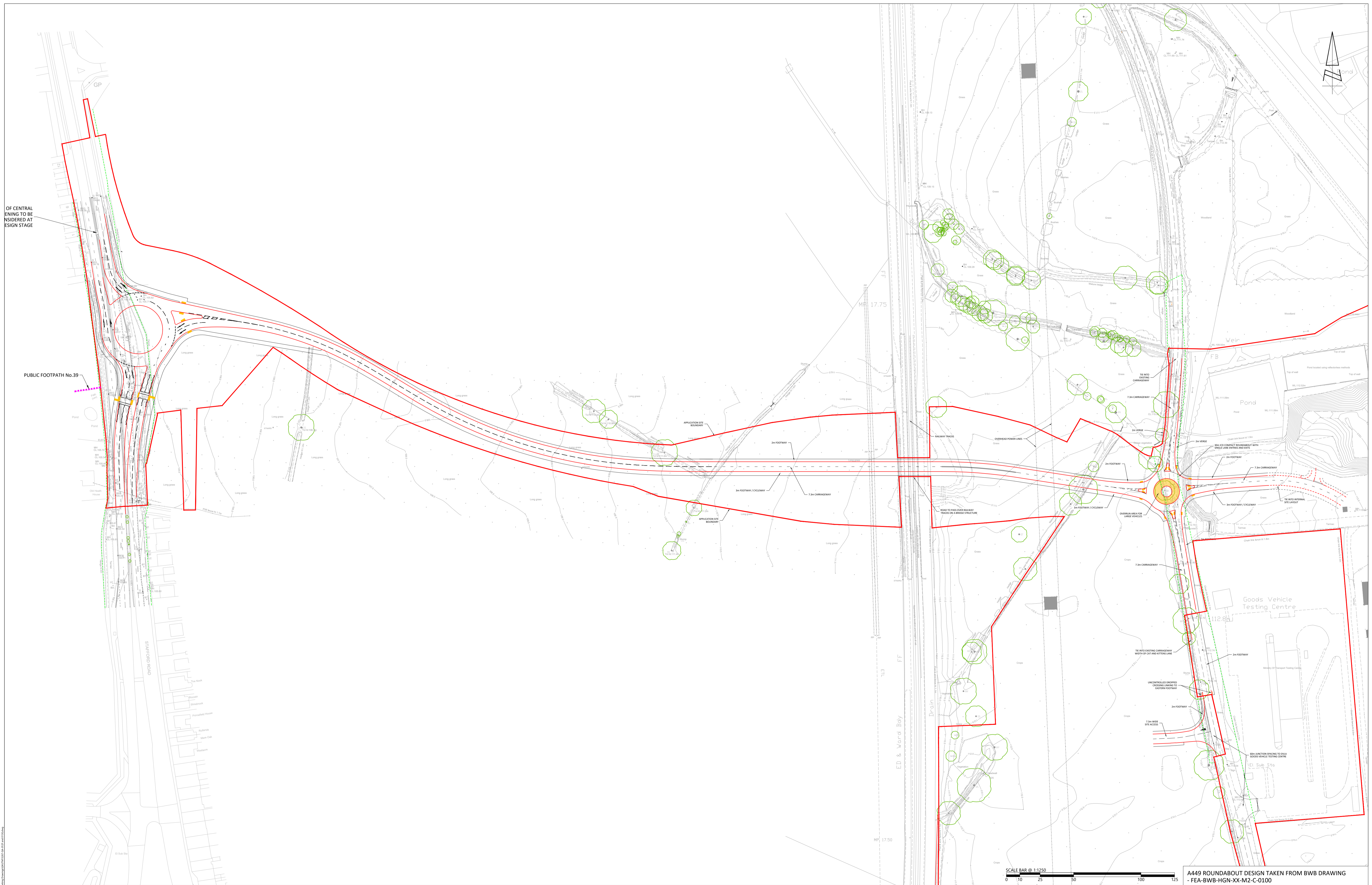


CROSS GREEN VILLAGE, FEATHERSTONE | DEVELOPMENT FRAMEWORK PLAN

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APPENDIX B

ROF Featherstone New Link Road



OF CENTRAL
ENDING TO BE
NSIDERED AT
ESIGN STAGE

PUBLIC FOOTPATH No.39

SCALE BAR @ 1:1250
0 10 25 50 100 125

A449 ROUNDABOUT DESIGN TAKEN FROM BWB DRAWING
- FEA-BWB-HGN-XX-M2-C-0100



Centurion House, 129 Deansgate
Manchester, M3 3WR
Tel: 0161 830 2172
www.i-transport.co.uk

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REV	DATE	BY	DESCRIPTION	CHK	APP	PROJECT
G	16.06.21	JB	AMENDED JUNCTION ARRANGEMENT	JW	SE	TITLE
F	19.07.21	PH	RECEIPT LAY BY AMENDED	SE	SE	
E	11.12.20	PH	RED LINE BOUNDARY UPDATED	SE	SE	
D	10.12.20	PH	CAT & KITTENS ROUNDABOUT AMENDED	SE	SE	
C	09.12.20	JB	HIGHWAY BOUNDARY UPDATED	SE	SE	
B	25.11.20	JB	MINOR EDITS TO KEY	SE	SE	

STATUS: FOR INFORMATION

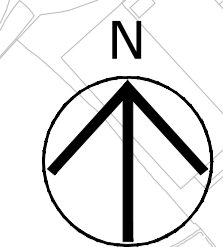
LOGIC 54

CLIENT: ST FRANCIS GROUP (FEATHERSTONE 2) LTD /
PEVERIL SECURITIES LIMITED

DRAWN	CHECKED	APPROVED
JB	JW	SE
PROJECT No:	SCALE @ 1:	DATE:
ITM15267	1:1250	27.01.20
DRAWING No:	REV:	
ITM15267-GA-013	G	

APPENDIX C

M54 – M6 Link Road



SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION BOX	
IT IS ASSUMED THAT ALL WORKS ON THIS DRAWING WILL BE CARRIED OUT BY A COMPETENT CONTRACTOR WORKING, WHERE APPROPRIATE, TO AN APPROPRIATE METHOD STATEMENT.	
THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT.	
EXCEPTIONAL RISKS RELATING TO THE WORKS ASSOCIATED WITH THIS DRAWING ARE IDENTIFIED BELOW.	
CONSTRUCTION	
MAINTENANCE / OPERATION / DECOMMISSIONING / DEMOLITION	
NOTES	
1. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT DOCUMENTATION.	
2. DO NOT SCALE FROM THIS DRAWING. USE ONLY PRINTED DIMENSIONS.	
3. ALL DIMENSIONS IN MILLIMETRES. ALL CHAINAGES, LEVELS AND COORDINATES ARE IN METRES UNLESS DEFINED OTHERWISE.	
4. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE PROJECT HEALTH & SAFETY FILE FOR ANY IDENTIFIED POTENTIAL RISKS.	
5. GENERAL ARRANGEMENT BASED ON MODEL REV P03.	
KEY	
	LIMITS OF LAND TO BE ACQUIRED OR USED PERMANENTLY OR TEMPORARILY (THE ORDER LIMITS)
	LAND NOT INCLUDED WITHIN THE ORDER LIMITS
Purpose of issue SUITABLE FOR INFORMATION	
Client Highways England The Cube 199 Wharfside Street Birmingham B1 1RN	Working on behalf of highways england
Project Title M54 M6 Link Improvements	
Drawing Title GENERAL ARRANGEMENT SCHEME WIDE	
Internal Project No. 60536736	Suitability S2
Scale @ A1 NTSH/NTSV	Zone Highways General
Drawing Number HE514465 -ACM -HGN- M54_SW_PR_Z -DR-CH-1001	Location I Type I Role I Number
1 Originator 1 Volume	Rev P07

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APPENDIX D

South Staffordshire Cycle Map

General advice

Before setting off

Check your bike, especially if you have not ridden in a while. Your bike will need to be suitable for the terrain on which you will be cycling. Plan for emergencies – take a pump, puncture kit and some form of ID. Make sure that your brakes work, your chain is not too loose or tight, and your tyres are pumped up. If it has been a long time since your bike has been out you could get a reputable dealer to service it.

Cycle Helmets

Cycle helmets are not a legal requirement but they will help to reduce the severity of a head injury in the event of an accident.

Clothing

A cyclist can cycle in the majority of weather conditions; the key is to wear appropriate clothing to protect you against the elements. However, always consider how visible you are; when it is dull and dark you need to be certain that motorists can see you! Wear bright or fluorescent colours during the day and reflective material at night.

Lights

Check your lights are working; it is a legal requirement to have a steady light on your bike at night and on dull days.

Cycling along canals

The Canal & River Trust (formerly British Waterways) welcomes considerate cyclists to its towpaths and you don't need a permit to use your bike on any of our towpaths. Lots of people visit the waterways for many different reasons and everyone is entitled to feel happy and safe whilst they're visiting.

So the Canal & River Trust asks everyone to follow the **Greenways Code for Towpaths** – 10 points which encourage considerate, safe and courteous use of towpaths:

- Share the space** Consider other people and the local environment whenever you're on a towpath. Remember some people may move less predictably, for example young children or those with visual or mobility impairments.
- Drop your pace** Considerate sharing of the limited towpath space is the key. Jogging and cycling are welcome, but drop your pace in good time and let people know you are approaching by ringing a bell or politely calling out before waiting to pass slowly.
- Pedestrians have priority** Towpaths are 'Greenways' or shared use routes where pedestrians have priority and vehicles are generally excluded.
- Be courteous to others** A smile can go a long way. Abusive or threatening behaviour is not acceptable and should be reported to the Police.
- Follow signs** They are there for the safety of everyone. Cyclists should dismount where required and use common sense in busy or restricted areas, recognising that pedestrians have priority.
- Give way to oncoming people beneath bridges** Whether they are on foot or bike and be extra careful at bends and entrances where visibility is limited.
- When travelling in large groups** especially if you are running or cycling, please use common sense and give way to others.
- Try to avoid wearing headphones** as this makes you less aware of your surroundings possible hazards and others sharing the same space.
- Keep dogs on a short lead** and clean-up after them. Dog fouling is very unpleasant and is a health hazard.
- Keep children close to you at all times** and encourage them to learn and follow the Greenway Code for Towpaths.

Useful contacts

To report potholes, damaged pavements, blocked drains, broken streetlights and pedestrian crossings, call the County Council's contact centre on 0300 111 8000.

British Cycling

0161 274 2000
www.britishcycling.org.uk

Sustrans and the National Cycle Network

0117 929 0888; info@sustrans.org.uk
www.sustrans.co.uk

Cyclists' Touring Club

www.ctc.org.uk
08705 00 44 44
www.staffordshire.gov.uk/tourism

Journey Planner

www.transportdirect.info
www.staffordshire.gov.uk/intostafford

Cycle Journey Planner

www.cyclestreets.net
www.walkkit.com

Use Staffordshire Share-A-Lift to find potential travel companions. Visit: www.share-a-lift.com for more information.

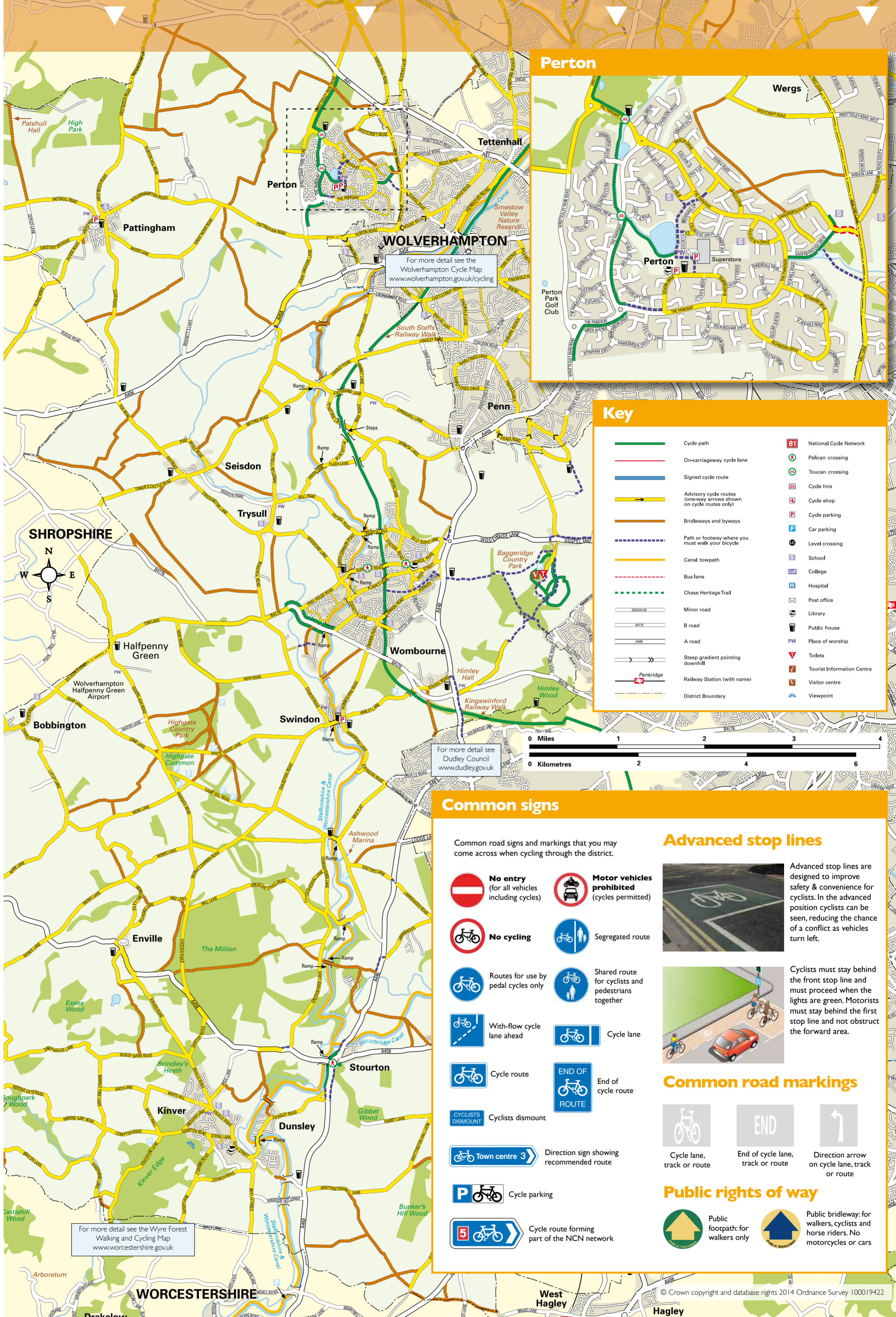
The legal stuff
All rights reserved. No part of this publication may be stored in a retrieval system or transmitted, in any form or by any means, electronic, mechanical, photocopying, recording or otherwise, without the permission of the publisher and copyright owner.
The representation of a track or path is no evidence of a public right of way. Users of all routes shown on this map do so entirely at their own risk. We cannot guarantee that all routes and brideways will always be passable by bike, particularly in wet weather.

WHY CYCLE?

- Cycling can save you money.
- Cycling improves your strength, stamina and aerobic fitness with little risk of over-exertion.
- At 10-20mph door to door: it is the fastest travel mode in urban peak hours.
- According to the British Medical Association (BMA), cycling five miles four times a week can cut risks of coronary heart disease by up to half. Regular activity also reduces chances of strokes, colon cancers and osteoporosis.
- Riding your bike to work is a great way to make two aerobic workouts part of your daily routine.
- Cycling produces no atmospheric pollution and virtually no noise.
- Cycle instead of going by car and you'll help cut congestion.
- Around three quarters of all journeys made in the UK are less than 5 miles. Many of these journeys could be made by bicycle.

If you need a copy of this information in large print, Braille, another language or on cassette, please call 01785 (27) 6615.

www.staffordshire.gov.uk



Common signs

Common road signs and markings that you may come across when cycling through the district.

- No entry** (for all vehicles including cycles)
- No cycling**
- Routes for use by pedal cycles only
- With-flow cycle lane ahead
- Cycle route
- CYCLISTS DISMOUNT**
- Town centre 3** Direction sign showing recommended route
- P** Cycle parking
- 5** Cycle route forming part of the NCN network
- Motor vehicles prohibited** (cycles permitted)
- Segregated route
- Shared route for cyclists and pedestrians together
- Cycle lane
- END OF ROUTE** End of cycle route

Advanced stop lines



Advanced stop lines are designed to improve safety & convenience for cyclists. In the advanced position cyclists can be seen, reducing the chance of a conflict as vehicles turn left.



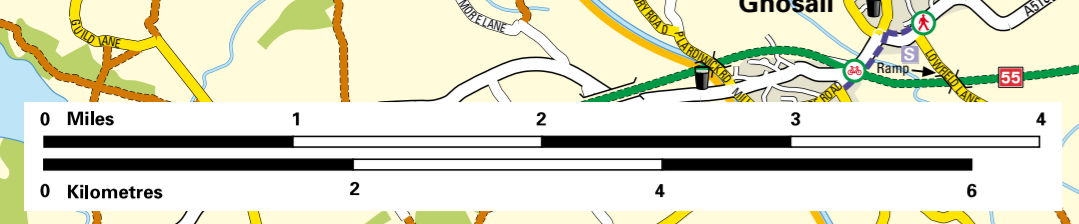
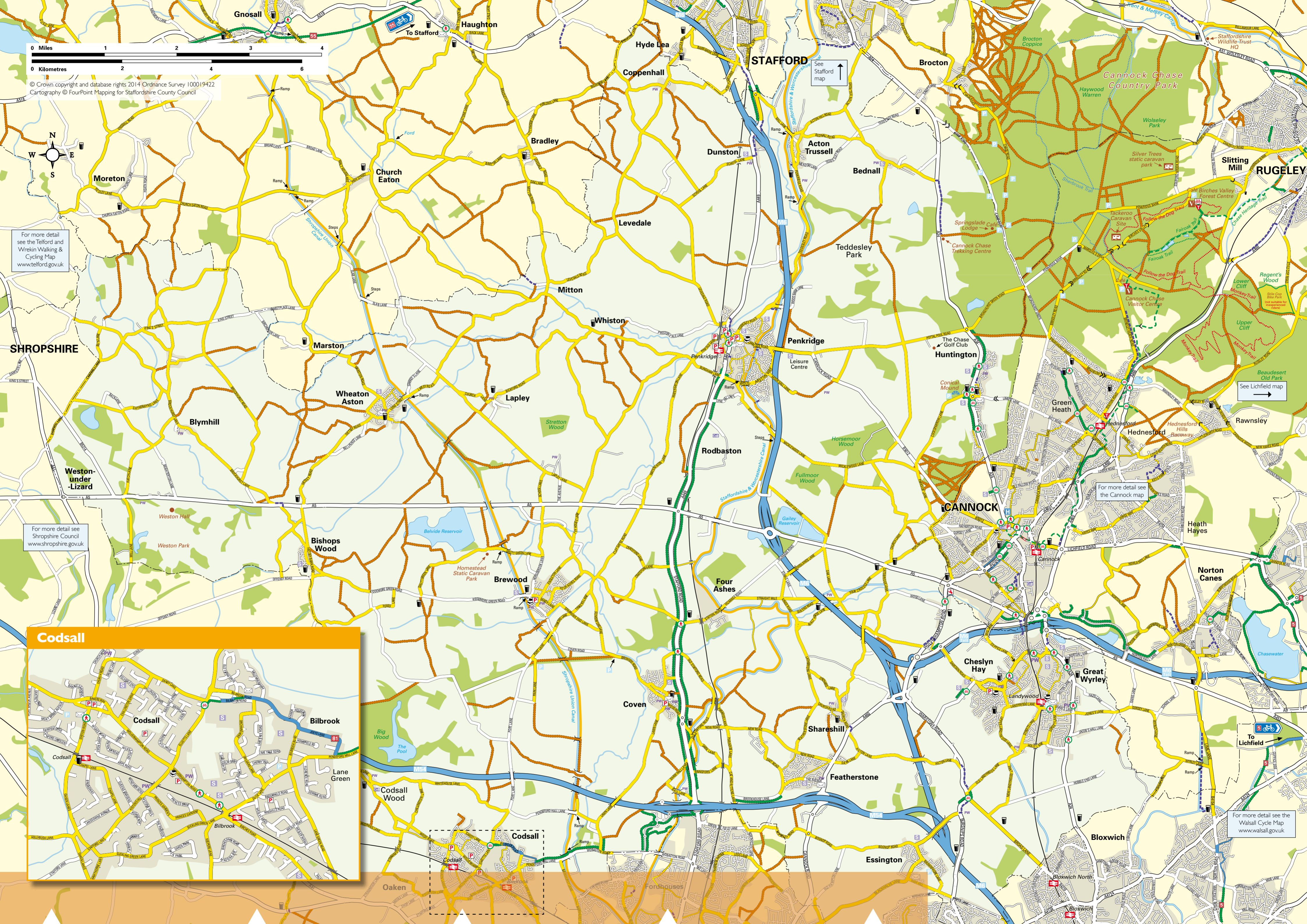
Cyclists must stay behind the front stop line and must proceed when the lights are green. Motorists must stay behind the first stop line and not obstruct the forward area.

Common road markings

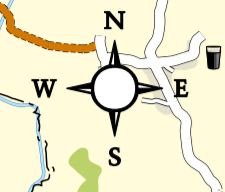
- Cycle lane, track or route
- END** End of cycle lane, track or route
- Direction arrow on cycle lane, track or route

Public rights of way

- Public footpath: for walkers only**
- Public brideway: for walkers, cyclists and horse riders. No motorcycles or cars**

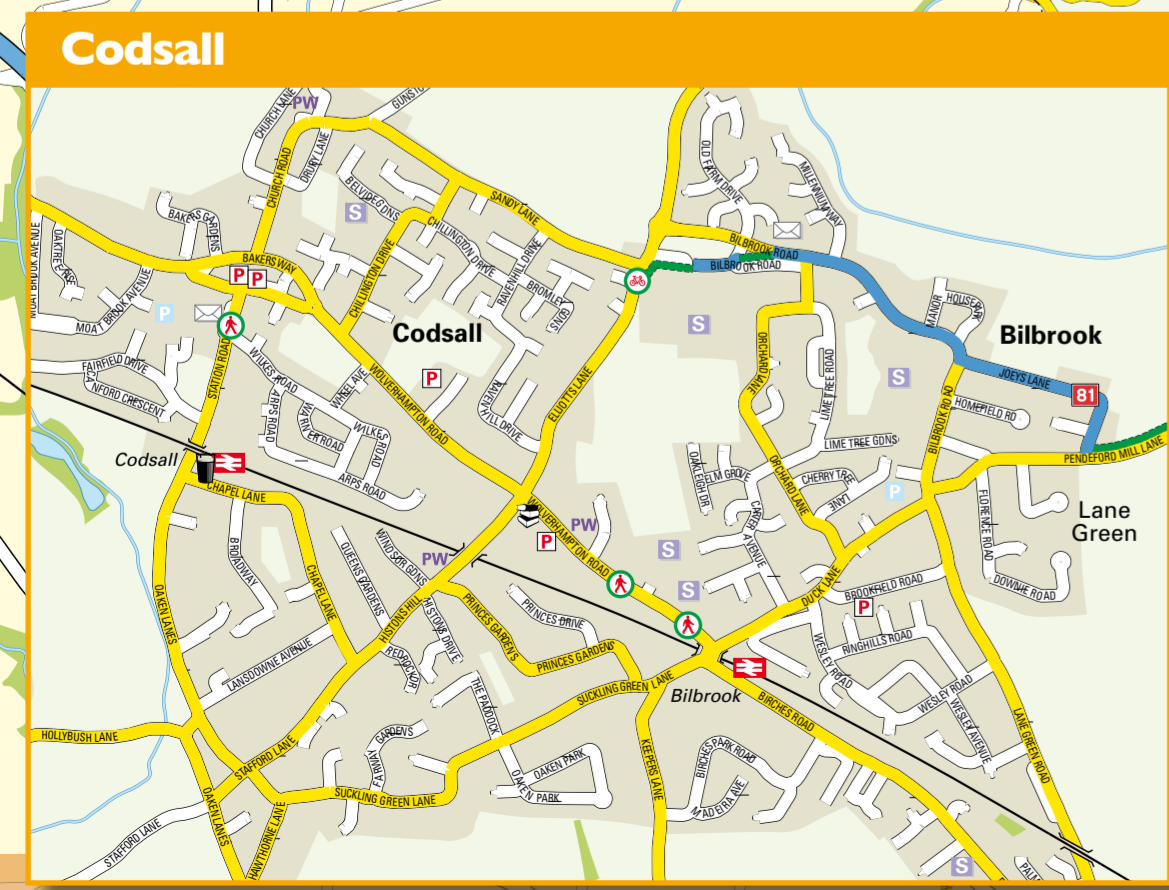


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For more detail see the Telford and Wrekin Walking & Cycling Map
www.telford.gov.uk

For more detail see Shropshire Council
www.shropshire.gov.uk

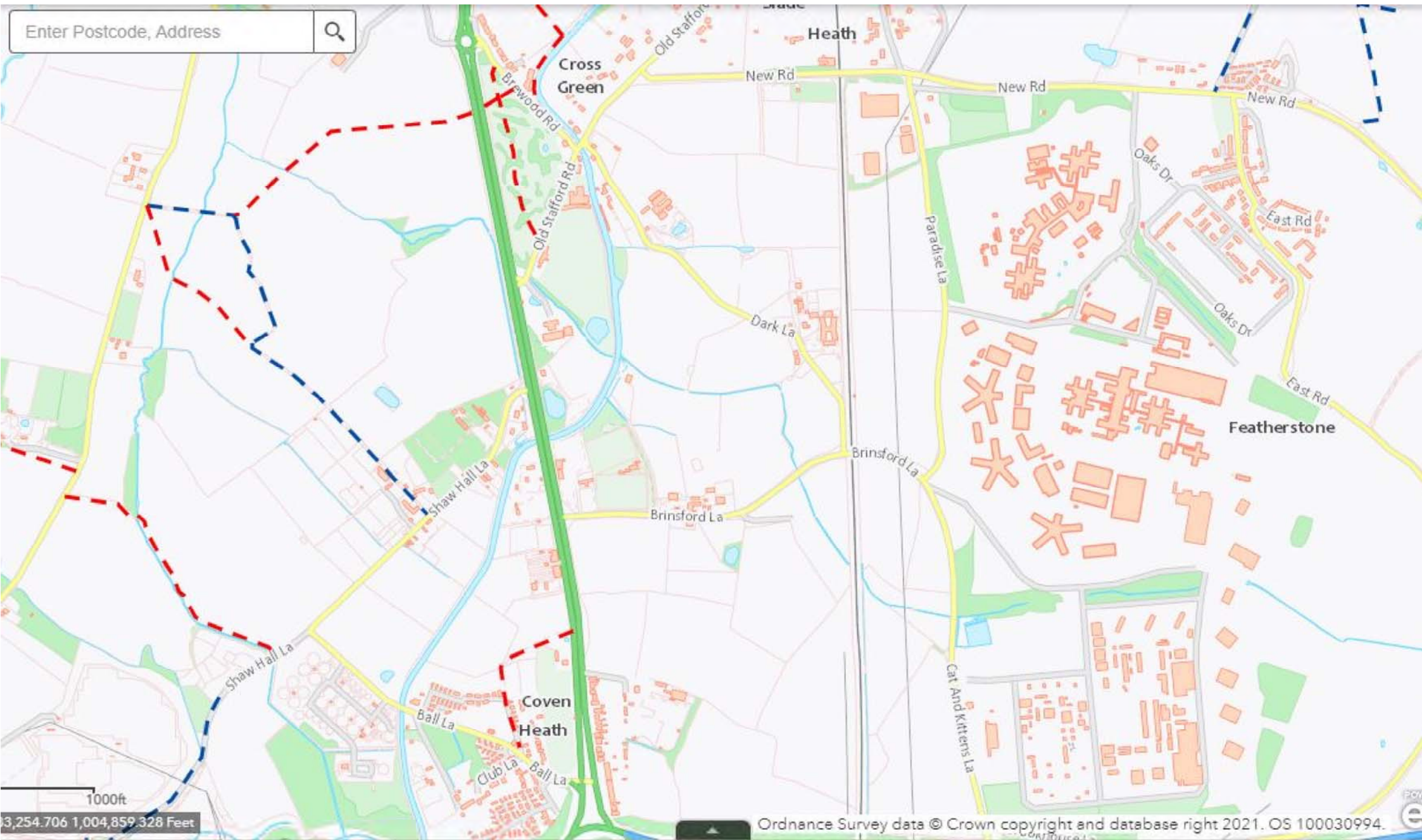


For more detail see the Walsall Cycle Map
www.walsall.gov.uk

APPENDIX E

PROW Extract

Enter Postcode, Address



1000ft

3,254.706 1,004,859.328 Feet

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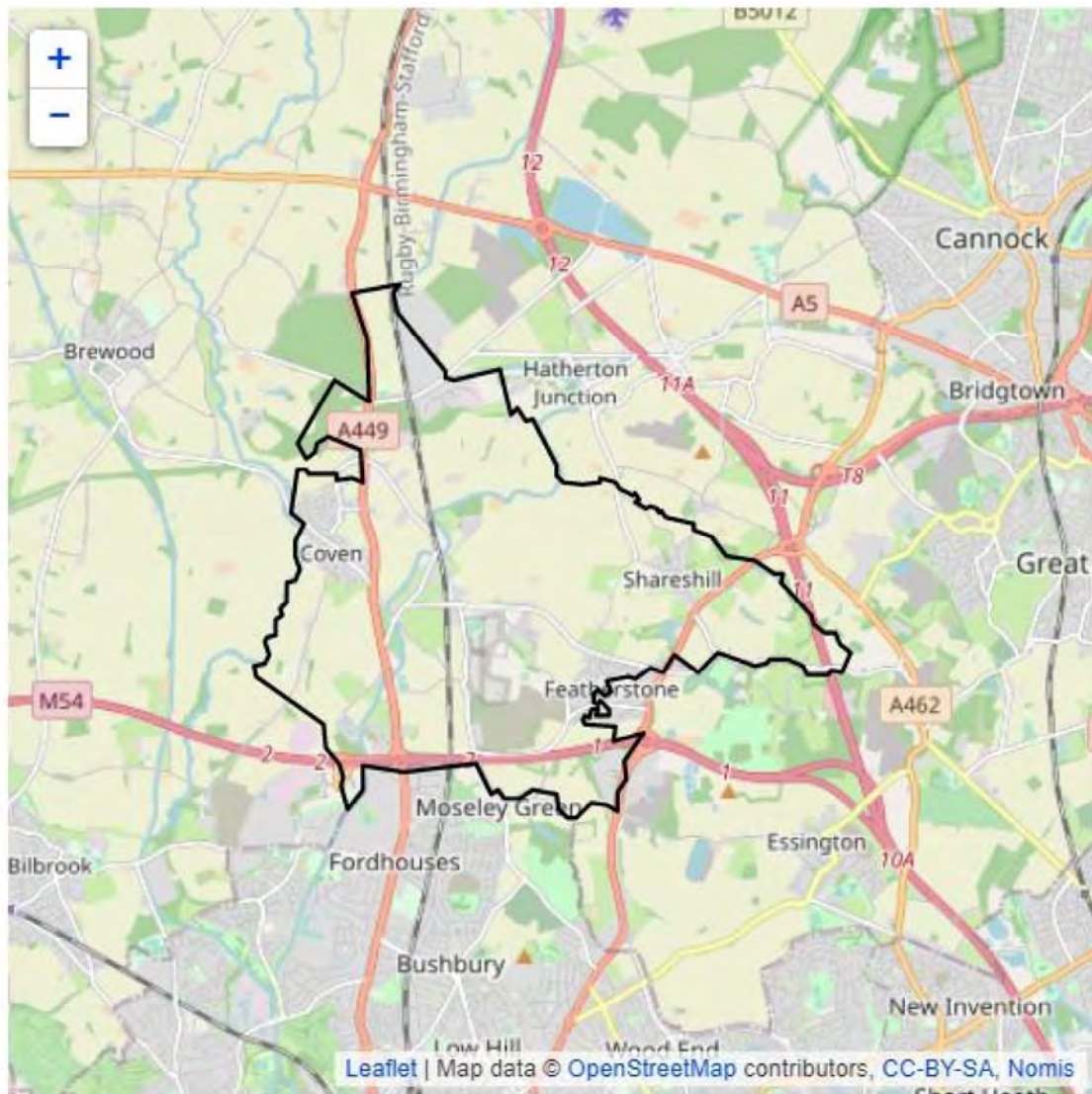


APPENDIX F

TRIP Distribution Data

Map of E02006179 : South Staffordshire 006

Close



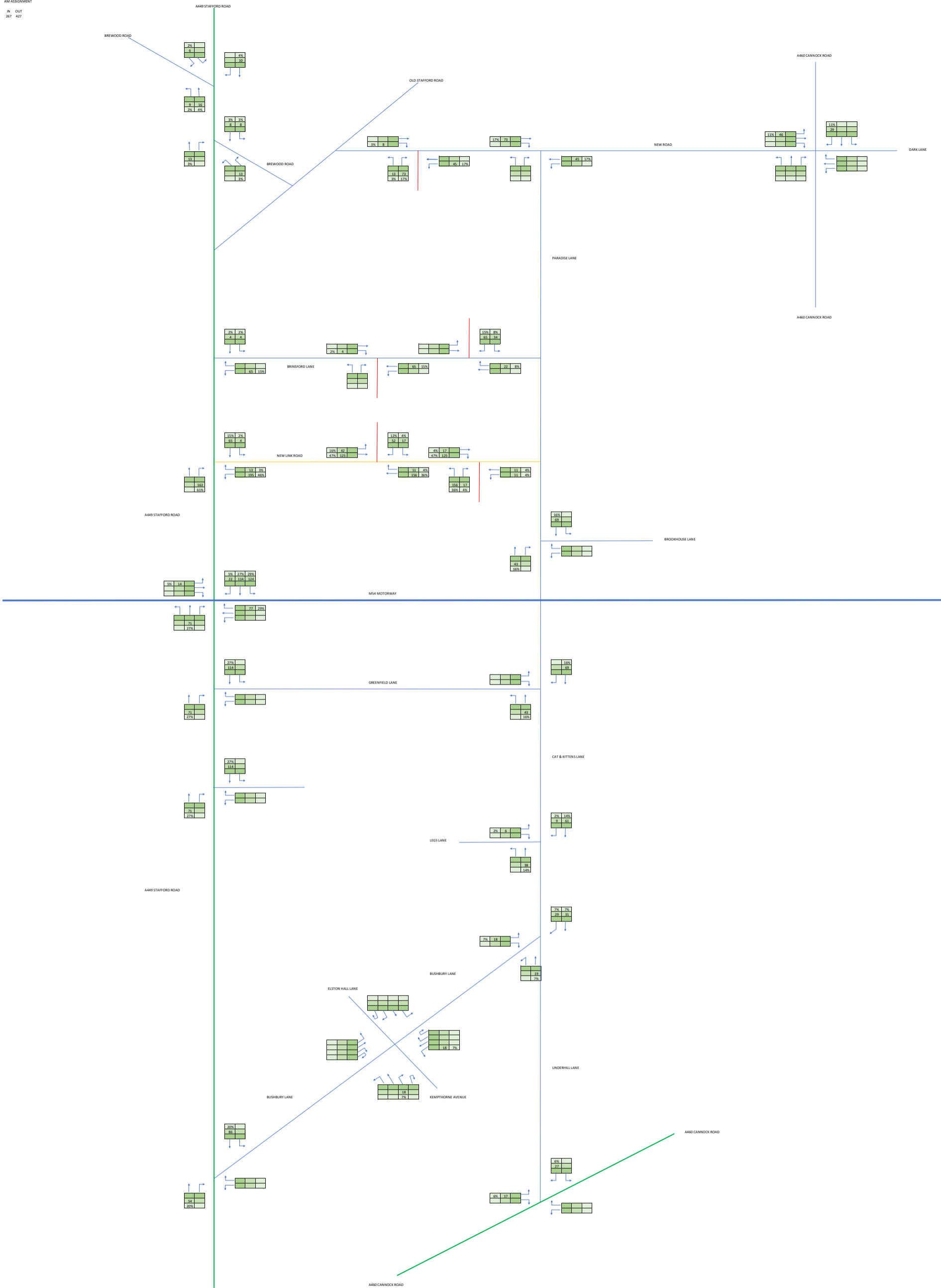
Workplace	All	Home	Underground	Train	Bus	Taxi	Motorcycle	Car_Driver	Car_Passenger	Bike	Foot	Other
Amber Valley 005	1	0	0	0	0	0	0	1	0	0	0	0
Amber Valley 010	1	0	0	0	0	0	0	1	0	0	0	0
Ashfield 010	1	0	0	0	0	0	0	1	0	0	0	0
Barnsley 002	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 004	2	0	0	0	0	0	0	2	0	0	0	0
Birmingham 008	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 010	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 016	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 018	3	0	0	0	0	0	0	3	0	0	0	0
Birmingham 021	2	0	0	0	0	0	0	2	0	0	0	0
Birmingham 023	1	0	0	0	0	0	1	0	0	0	0	0
Birmingham 024	4	0	0	0	0	0	1	3	0	0	0	0
Birmingham 025	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 026	2	0	0	0	0	0	0	2	0	0	0	0
Birmingham 028	8	0	0	0	0	0	0	8	0	0	0	0
Birmingham 029	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 030	2	0	0	0	0	0	0	2	0	0	0	0
Birmingham 031	3	0	0	0	0	0	0	3	0	0	0	0
Birmingham 033	1	0	0	0	0	0	0	0	0	1	0	0
Birmingham 037	5	0	0	0	0	0	0	5	0	0	0	0
Birmingham 039	3	0	0	0	0	0	0	3	0	0	0	0
Birmingham 040	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 042	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 043	4	0	0	0	0	0	0	4	0	0	0	0
Birmingham 047	7	0	0	1	0	0	0	6	0	0	0	0
Birmingham 048	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 049	3	0	0	0	0	0	0	3	0	0	0	0
Birmingham 050	40	0	1	7	1	0	3	24	1	2	1	0
Birmingham 052	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 053	3	0	1	0	0	0	0	2	0	0	0	0
Birmingham 056	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 057	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 071	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 074	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 079	1	0	0	1	0	0	0	0	0	0	0	0
Birmingham 081	2	0	0	0	1	0	0	1	0	0	0	0
Birmingham 087	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 089	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 094	3	0	0	0	0	0	0	3	0	0	0	0
Birmingham 097	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 102	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 113	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 121	1	0	0	0	0	0	0	1	0	0	0	0
Birmingham 134	6	0	0	2	0	0	0	3	1	0	0	0
Birmingham 135	4	0	0	2	0	0	0	2	0	0	0	0
Birmingham 137	5	0	1	1	0	0	0	3	0	0	0	0
Birmingham 138	23	0	1	14	0	0	0	8	0	0	0	0
Birmingham 140	3	0	0	2	0	0	0	1	0	0	0	0
Blackburn with Darwen 011	1	0	0	0	0	0	0	1	0	0	0	0
Bradford 020	1	0	0	0	0	0	0	1	0	0	0	0
Bristol 054	1	0	0	0	0	0	0	1	0	0	0	0
Bromsgrove 014	1	0	0	0	0	0	0	1	0	0	0	0
Calderdale 008	5	0	0	0	0	0	0	5	0	0	0	0
Cannock Chase 001	1	0	0	0	0	0	0	1	0	0	0	0
Cannock Chase 002	4	0	0	0	0	0	0	4	0	0	0	0
Cannock Chase 003	2	0	0	0	0	0	0	2	0	0	0	0
Cannock Chase 005	1	0	0	0	0	0	0	1	0	0	0	0
Cannock Chase 006	1	0	0	0	0	0	0	1	0	0	0	0
Cannock Chase 007	1	0	0	0	0	0	0	1	0	0	0	0
Cannock Chase 008	4	0	0	0	0	0	0	3	1	0	0	0
Cannock Chase 009	5	0	0	0	0	0	0	5	0	0	0	0
Cannock Chase 010	5	0	0	0	0	0	0	5	0	0	0	0
Cannock Chase 011	34	0	0	0	4	0	0	29	0	0	1	0
Cannock Chase 012	73	0	0	0	7	0	0	61	4	1	0	0
Cannock Chase 013	32	0	0	0	1	0	1	25	4	0	1	0
Cheltenham 014	1	0	0	0	0	0	0	1	0	0	0	0
Cheshire East 012	1	0	0	0	0	0	0	1	0	0	0	0
Cheshire East 027	1	0	0	1	0	0	0	0	0	0	0	0
Cheshire West and Chester 007	1	0	0	0	0	0	0	1	0	0	0	0
Cheshire West and Chester 035	2	0	0	0	0	0	0	2	0	0	0	0
Cornwall 039	1	0	0	0	0	0	0	0	0	0	1	0
Coventry 004	1	0	0	0	0	0	0	1	0	0	0	0
Coventry 010	1	0	0	0	0	0	0	1	0	0	0	0
Coventry 031	2	0	0	1	0	0	0	1	0	0	0	0
Coventry 036	1	0	0	0	0	0	0	1	0	0	0	0
Coventry 038	2	0	0	0	0	0	0	2	0	0	0	0
Daventry 007	1	0	0	0	0	0	0	1	0	0	0	0
Derby 007	1	0	0	0	0	0	0	0	1	0	0	0
Derby 018	1	0	0	0	0	0	0	1	0	0	0	0
Doncaster 014	1	0	0	0	0	0	0	1	0	0	0	0
Dudley 001	1	0	0	0	0	0	0	1	0	0	0	0
Dudley 002	3	0	0	0	0	0	0	3	0	0	0	0
Dudley 006	4	0	0	0	0	0	0	4	0	0	0	0
Dudley 007	2	0	0	0	0	0	0	2	0	0	0	0
Dudley 010	2	0	0	0	0	0	0	2	0	0	0	0
Dudley 011	10	0	0	0	0	0	0	10	0	0	0	0
Dudley 012	7	0	0	0	0	0	0	7	0	0	0	0
Dudley 013	8	0	0	0	1	0	0	7	0	0	0	0
Dudley 015	8	0	0	0	0	0	0	7	1	0	0	0
Dudley 016	3	0	0	0	0	0	0	3	0	0	0	0
Dudley 017	2	0	0	0	0	0	0	2	0	0	0	0
Dudley 018	1	0	0	0	0	0	0	1	0	0	0	0
Dudley 020	1	0	0	0	0	0	0	1	0	0	0	0
Dudley 021	1	0	0	0	0	0	0	1	0	0	0	0
Dudley 022	7	0	0	0	0	0	0	7	0	0	0	0
Dudley 023	2	0	0	0	0	0	0	2	0	0	0	0
Dudley 029	1	0	0	0	0	0	0	1	0	0	0	0
Dudley 030	3	0	0	0	0	0	0	3	0	0	0	0
Dudley 031	1	0	0	0	0	0	0	1	0	0	0	0
Dudley 034	4	0	0	0	0	0	0	4	0	0	0	0
Dudley 035	1	0	0	0	1	0	0	0	0	0	0	0
Dudley 039	1	0	0	0	0	0	0	1	0	0	0	0
Dudley 040	1	0	0	0	0	0	0	1	0	0	0	0
Dudley 042	1	0	0	0	0	0	0	1	0	0	0	0
Ealing 025	1	0	0	0	0	0	0	1	0	0	0	0
East Devon 006	1	0	0	0	0	0	0	1	0	0	0	0
East Northamptonshire 005	1	0	0	0	0	0	0	1	0	0	0	0
East Northamptonshire 007	1	0	0	0	0	0	0	1	0	0	0	0
East Riding of Yorkshire 024	1	0	0	0	0	0	0	1	0	0	0	0
East Staffordshire 001	1	0	0	0	0	0	0	0	0	0	0	1
East Staffordshire 003	1	0	0	0	0	0	0	0	0	0	1	0
East Staffordshire 006	5	0	0	0	0	0	0	3	0	0	2	0
East Staffordshire 008	1	0	0	0	0	0	0	1	0	0	0	0
East Staffordshire 009	5	0	0	0	0	0	0	4	0	1	0	0
East Staffordshire 011	1	0	0	0	0	0	0	1	0	0	0	0
East Staffordshire 013	2	0	0	0	0	0	0	2	0	0	0	0
East Staffordshire 015	1	0	0	0	0	0	0	1	0	0	0	0
Erewash 003	1	0	0	0	0	0	0	1	0	0	0	0
Gwynedd 010	1	0	0	0	0	0	0	1	0	0	0	0
Hambleton 007	1	0	0	0	0	0	0	0	0	0	1	0
Harborough 009	1	0	0	0	0	0	0	1	0	0	0	0

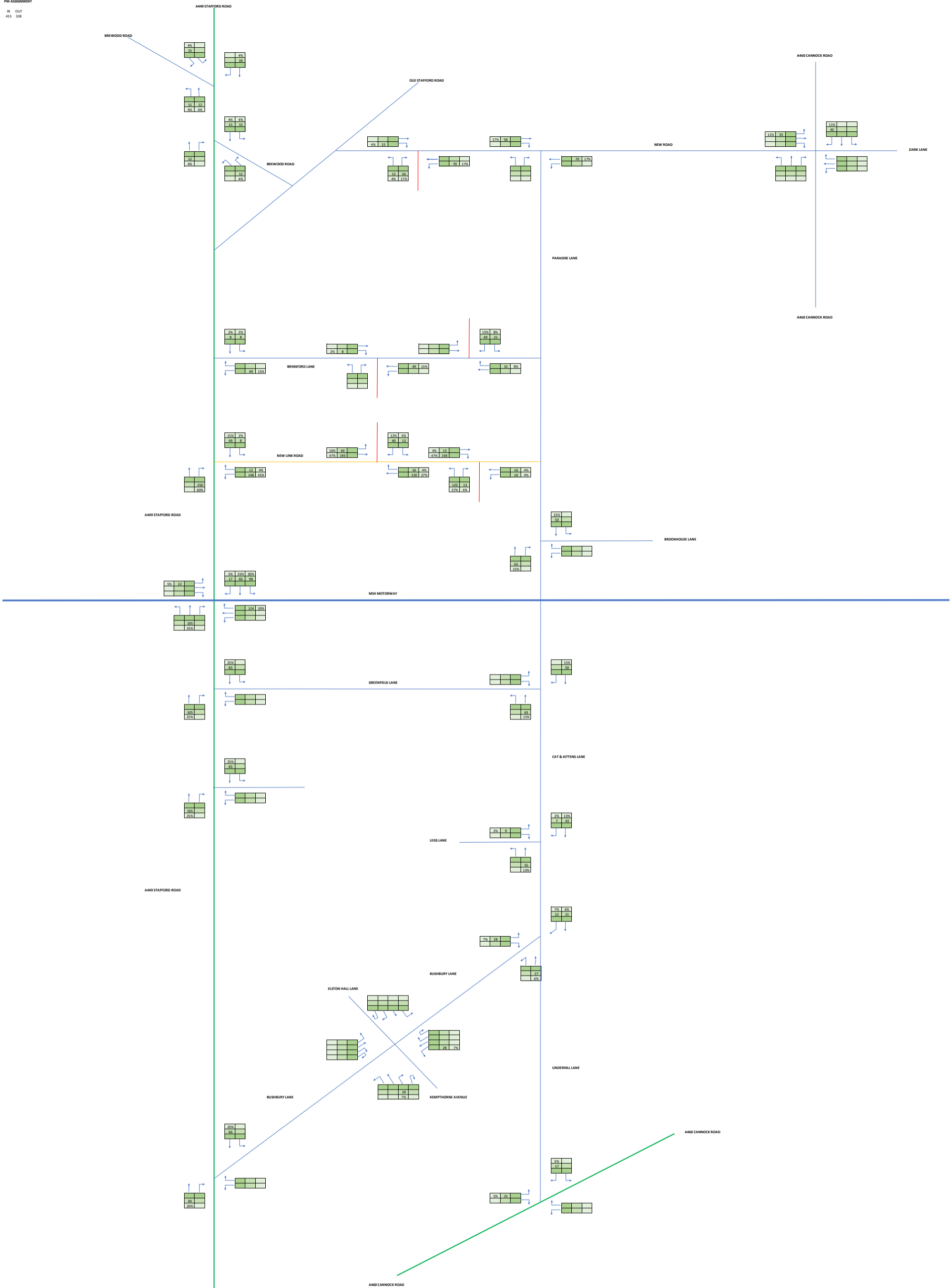
South Staffordshire 011	5	0	0	0	0	0	0	5	0	0	0	0
South Staffordshire 012	20	0	0	0	1	0	0	16	2	0	1	0
South Staffordshire 013	5	0	0	0	0	0	0	4	1	0	0	0
South Staffordshire 014	6	0	0	0	0	0	0	2	0	2	2	0
Southwark 003	1	0	0	1	0	0	0	0	0	0	0	0
Southwark 020	1	0	0	0	0	0	0	1	0	0	0	0
St Edmundsbury 002	1	0	0	0	0	0	0	0	0	0	1	0
Stafford 002	1	0	0	0	0	0	0	1	0	0	0	0
Stafford 003	3	0	0	0	0	0	0	2	0	0	1	0
Stafford 004	4	0	0	0	0	0	0	4	0	0	0	0
Stafford 005	4	0	0	0	0	0	0	4	0	0	0	0
Stafford 006	8	0	0	0	0	0	0	6	2	0	0	0
Stafford 008	2	0	0	0	0	0	0	2	0	0	0	0
Stafford 009	4	0	0	0	0	0	0	4	0	0	0	0
Stafford 010	31	0	0	0	1	0	0	30	0	0	0	0
Stafford 011	12	0	0	0	0	0	0	11	1	0	0	0
Stafford 012	3	0	0	0	0	0	0	3	0	0	0	0
Stafford 013	1	0	0	0	0	0	0	1	0	0	0	0
Stafford 014	1	0	0	0	0	0	0	1	0	0	0	0
Stafford 015	1	0	0	0	0	0	0	1	0	0	0	0
Staffordshire Moorlands 009	2	0	0	0	0	0	0	1	1	0	0	0
Staffordshire Moorlands 011	1	0	0	0	0	0	0	1	0	0	0	0
Staffordshire Moorlands 013	3	0	0	0	0	0	0	3	0	0	0	0
Stockport 013	1	0	0	0	0	0	0	1	0	0	0	0
Stoke-on-Trent 002	1	0	0	0	0	0	0	1	0	0	0	0
Stoke-on-Trent 005	2	0	0	0	0	0	0	2	0	0	0	0
Stoke-on-Trent 009	2	0	0	0	0	0	0	2	0	0	0	0
Stoke-on-Trent 015	3	0	0	0	0	0	0	3	0	0	0	0
Stoke-on-Trent 016	1	0	0	1	0	0	0	0	0	0	0	0
Stoke-on-Trent 018	3	0	0	0	0	0	0	3	0	0	0	0
Stoke-on-Trent 020	1	0	0	0	0	0	0	1	0	0	0	0
Stoke-on-Trent 023	1	0	0	0	0	0	0	1	0	0	0	0
Stoke-on-Trent 032	2	0	0	0	0	0	0	2	0	0	0	0
Stratford-on-Avon 005	1	0	0	0	0	0	0	1	0	0	0	0
Stratford-on-Avon 006	1	0	0	0	0	0	0	1	0	0	0	0
Tameside 029	2	0	0	0	0	0	0	2	0	0	0	0
Tamworth 002	7	0	0	0	0	0	0	7	0	0	0	0
Tamworth 003	3	0	0	0	0	0	0	3	0	0	0	0
Tamworth 005	4	0	0	0	1	0	0	3	0	0	0	0
Tamworth 007	1	0	0	0	0	0	0	1	0	0	0	0
Tamworth 010	2	0	0	0	0	0	0	2	0	0	0	0
Telford and Wrekin 003	1	0	0	0	0	0	0	1	0	0	0	0
Telford and Wrekin 005	3	0	0	0	0	0	0	3	0	0	0	0
Telford and Wrekin 007	1	0	0	0	0	0	0	1	0	0	0	0
Telford and Wrekin 008	4	0	0	0	0	0	0	3	1	0	0	0
Telford and Wrekin 009	10	0	0	0	0	0	0	10	0	0	0	0
Telford and Wrekin 010	1	0	0	0	0	0	0	1	0	0	0	0
Telford and Wrekin 011	2	0	0	0	0	0	0	2	0	0	0	0
Telford and Wrekin 012	2	0	0	0	0	0	0	2	0	0	0	0
Telford and Wrekin 013	1	0	0	0	0	0	0	1	0	0	0	0
Telford and Wrekin 014	2	0	0	0	0	0	0	2	0	0	0	0
Telford and Wrekin 015	3	0	0	0	1	0	0	2	0	0	0	0
Telford and Wrekin 016	22	0	0	0	0	0	0	22	0	0	0	0
Telford and Wrekin 018	16	0	0	1	0	0	0	15	0	0	0	0
Telford and Wrekin 022	1	0	0	0	0	0	0	1	0	0	0	0
Telford and Wrekin 023	10	0	0	0	0	0	0	10	0	0	0	0
Three Rivers 011	1	0	0	0	0	0	0	1	0	0	0	0
Torbay 003	1	0	0	0	0	0	0	1	0	0	0	0
Trafford 002	1	0	0	0	0	0	0	1	0	0	0	0
Trafford 020	1	0	0	0	0	0	0	1	0	0	0	0
Wakefield 013	1	0	0	0	0	0	0	1	0	0	0	0
Wakefield 030	1	0	0	0	0	0	1	0	0	0	0	0
Walsall 001	6	0	0	0	0	0	0	5	0	0	1	0
Walsall 002	6	0	0	0	0	0	0	6	0	0	0	0
Walsall 003	1	0	0	0	0	0	0	1	0	0	0	0
Walsall 004	3	0	0	0	0	0	0	3	0	0	0	0
Walsall 005	1	0	0	0	0	0	0	1	0	0	0	0
Walsall 008	7	0	0	0	0	0	1	6	0	0	0	0
Walsall 009	1	0	0	0	0	0	0	1	0	0	0	0
Walsall 010	1	0	0	0	0	0	0	1	0	0	0	0
Walsall 011	1	0	0	0	0	0	0	1	0	0	0	0
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Walsall 014	1	0	0	0	0	0	0	1	0	0	0	0
Walsall 015	15	0	0	0	0	0	0	13	1	1	0	0
Walsall 016	4	0	0	0	0	0	0	4	0	0	0	0
Walsall 017	21	0	0	0	0	0	1	20	0	0	0	0
Walsall 018	14	0	0	0	0	0	1	12	1	0	0	0
Walsall 019	2	0	0	0	0	0	0	2	0	0	0	0
Walsall 020	17	0	0	0	0	0	0	17	0	0	0	0
Walsall 021	3	0	0	0	0	0	0	3	0	0	0	0
Walsall 022	6	0	0	0	0	0	0	6	0	0	0	0
Walsall 023	2	0	0	0	0	0	0	2	0	0	0	0
Walsall 024	3	0	0	0	0	0	0	3	0	0	0	0
Walsall 025	33	0	0	0	0	0	0	23	10	0	0	0
Walsall 026	18	0	0	0	1	0	0	14	2	1	0	0
Walsall 027	13	0	0	0	1	0	0	11	1	0	0	0
Walsall 030	43	0	0	0	0	0	0	41	2	0	0	0
Walsall 031	2	0	0	0	0	0	0	1	1	0	0	0
Walsall 032	1	0	0	0	0	0	0	1	0	0	0	0
Walsall 033	15	0	0	0	0	0	0	15	0	0	0	0
Walsall 034	5	0	0	0	0	0	0	5	0	0	0	0
Walsall 036	9	0	0	0	0	0	1	8	0	0	0	0
Walsall 037	3	0	0	0	0	0	0	3	0	0	0	0
Walsall 038	8	0	0	0	0	0	0	8	0	0	0	0
Walsall 039	1	0	0	0	0	0	0	1	0	0	0	0
Warwick 010	1	0	0	0	0	0	0	1	0	0	0	0
Warwick 012	4	0	0	0	0	0	0	4	0	0	0	0
West Berkshire 010	1	0	0	0	0	0	0	1	0	0	0	0
Westminster 013	2	0	1	1	0	0	0	0	0	0	0	0
Wirral 016	1	0	0	0	0	0	0	1	0	0	0	0
Wolverhampton 001	54	0	0	0	0	0	0	50	2	1	1	0
Wolverhampton 002	106	0	0	0	3	0	0	86	9	5	3	0
Wolverhampton 003	14	0	0	0	0	0	0	11	0	2	1	0
Wolverhampton 004	21	0	0	0	0	0	0	20	1	0	0	0
Wolverhampton 005	5	0	0	0	0	0	0	5	0	0	0	0
Wolverhampton 006	20	0	0	0	0	0	1	15	3	1	0	0
Wolverhampton 007	15	0	0	0	2	0	0	12	1	0	0	0
Wolverhampton 008	13	0	0	0	0	0	0	12	0	0	1	0
Wolverhampton 009	21	0	0	0	0	0	0	16	4	0	1	0
Wolverhampton 010	10	0	0	0	1	0	0	9	0	0	0	0
Wolverhampton 011	22	0	0	0	2	0	0	18	2	0	0	0
Wolverhampton 012	59	0	0	0	1	0	3	50	3	1	1	0
Wolverhampton 013	36	0	0	0	1	0	0	32	1	2	0	0
Wolverhampton 014	21	0	0	0	1	0	0	18	1	0	0	1
Wolverhampton 015	110	0	0	0	6	0	0	95	9	0	0	0
Wolverhampton 016	15	0	0	0	1	0	0	12	2	0	0	0
Wolverhampton 017	42	0	0	0	1	0	0	39	2	0	0	0
Wolverhampton 018	40	0	0	0	1	0	0	37	2	0	0	0
Wolverhampton 019	3	0	0	0	0	0	0	3	0	0	0	0
Wolverhampton 020	254	0	0	2	36	1	1	189	21	2	2	0
Wolverhampton 021	14	0	0	0	1	0	0	12	1	0	0	0
Wolverhampton 022	3	0	0	0	0	0	0	3	0	0	0	0


Wolverhampton 023	11	0	0	0	1	0	0	10	0	0	0	0
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Wolverhampton 027	22	0	1	0	2	0	1	18	0	0	0	0
Wolverhampton 028	5	0	0	0	0	0	0	5	0	0	0	0
Wolverhampton 029	34	0	0	0	1	0	2	31	0	0	0	0
Wolverhampton 030	3	0	0	0	0	0	0	3	0	0	0	0
Wolverhampton 031	6	0	0	0	0	0	0	5	1	0	0	0
Wolverhampton 032	8	0	0	0	0	0	0	8	0	0	0	0
Wolverhampton 033	3	0	0	0	0	0	0	3	0	0	0	0
Wolverhampton 034	6	0	0	0	0	0	0	6	0	0	0	0
Wolverhampton 035	47	0	0	0	7	0	0	38	2	0	0	0
Worcester 010	1	0	0	0	0	0	0	1	0	0	0	0
Worcester 013	1	0	0	0	0	0	0	1	0	0	0	0
Wrexham 008	1	0	0	1	0	0	0	0	0	0	0	0
Wychavon 001	2	0	0	0	0	0	0	1	1	0	0	0
Wychavon 019	1	0	0	0	0	0	0	1	0	0	0	0
Wyre 013	1	0	0	0	0	0	0	1	0	0	0	0
Wyre Forest 007	1	0	0	0	0	0	0	1	0	0	0	0
Wyre Forest 009	1	0	0	0	0	0	0	1	0	0	0	0
York 020	1	0	0	0	0	0	0	1	0	0	0	0

APPENDIX G

Development Traffic Diagrams







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APPENDIX 3

Development Vision Document



LAND AT CROSS GREEN

DEVELOPMENT VISION

Prepared by Pegasus Group on behalf of Taylor Wimpey UK LTD

December 2022 | P20-0904

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 December 2022 Project code P20-0904
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**Taylor
 Wimpey**



LAND AT
CROSS GREEN



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**PEGASUS
 GROUP**





EXECUTIVE SUMMARY

This Development Vision document has been prepared by Taylor Wimpey UK Limited ("Taylor Wimpey") and demonstrates that land at Cross Green ('the site'), provides a unique opportunity to create a sustainable, distinctive and attractive residential development which safeguards the potential for the longer-term delivery of a rail-based parkway station. The site is promoted for an infrastructure led residential development, adjacent to strategic employment growth, which responds to the site's context and emerging policy requirements, to ensure a high quality, sustainable new village is created.

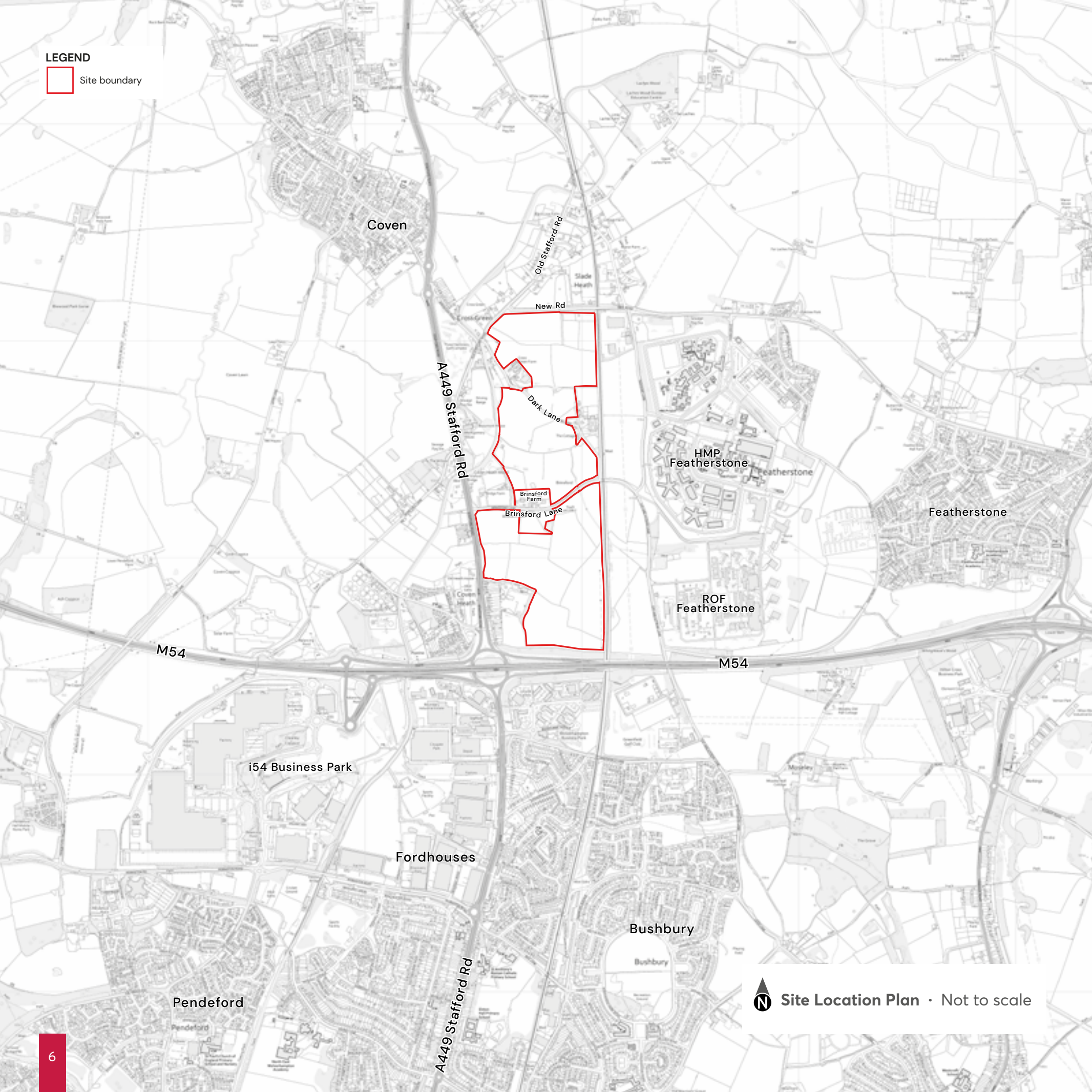
IN SUMMARY:

- The site provides an opportunity to deliver a new village in close proximity to employment opportunities, in the vicinity of, Junction 2 of the M54 in line with the recommended areas of search for strategic development identified within the Greater Birmingham Strategic Growth Study.
- The site safeguards land to support the delivery of a rail-based parkway station along the adjacent West Coast Mainline.
- Primary site access is achieved via the approved new link road to ROF Featherstone, supported by South Staffordshire District Council as the preferred route (Option 7).
- The site is not affected by any overriding physical, environmental or technical constraints.
- The Development Framework Plan demonstrates that the site could accommodate approximately 1,200 new homes, alongside significant new supporting infrastructure.
- The Development Framework Plan also includes land for a new primary school, community hub/village centre and a network of green and blue infrastructure.
- The site would deliver on the three aspects of sustainable development as per the requirements of the NPPF.
- The development is truly deliverable and would be completed swiftly by one of the UK's leading housebuilders.
- Taylor Wimpey is committed to engaging with South Staffordshire District Council, key stakeholders and the local community in preparing a Strategic Masterplan to deliver a high-quality development which delivers real benefits for the area.

INTRODUCTION

LEGEND

Site boundary



DOCUMENT OVERVIEW

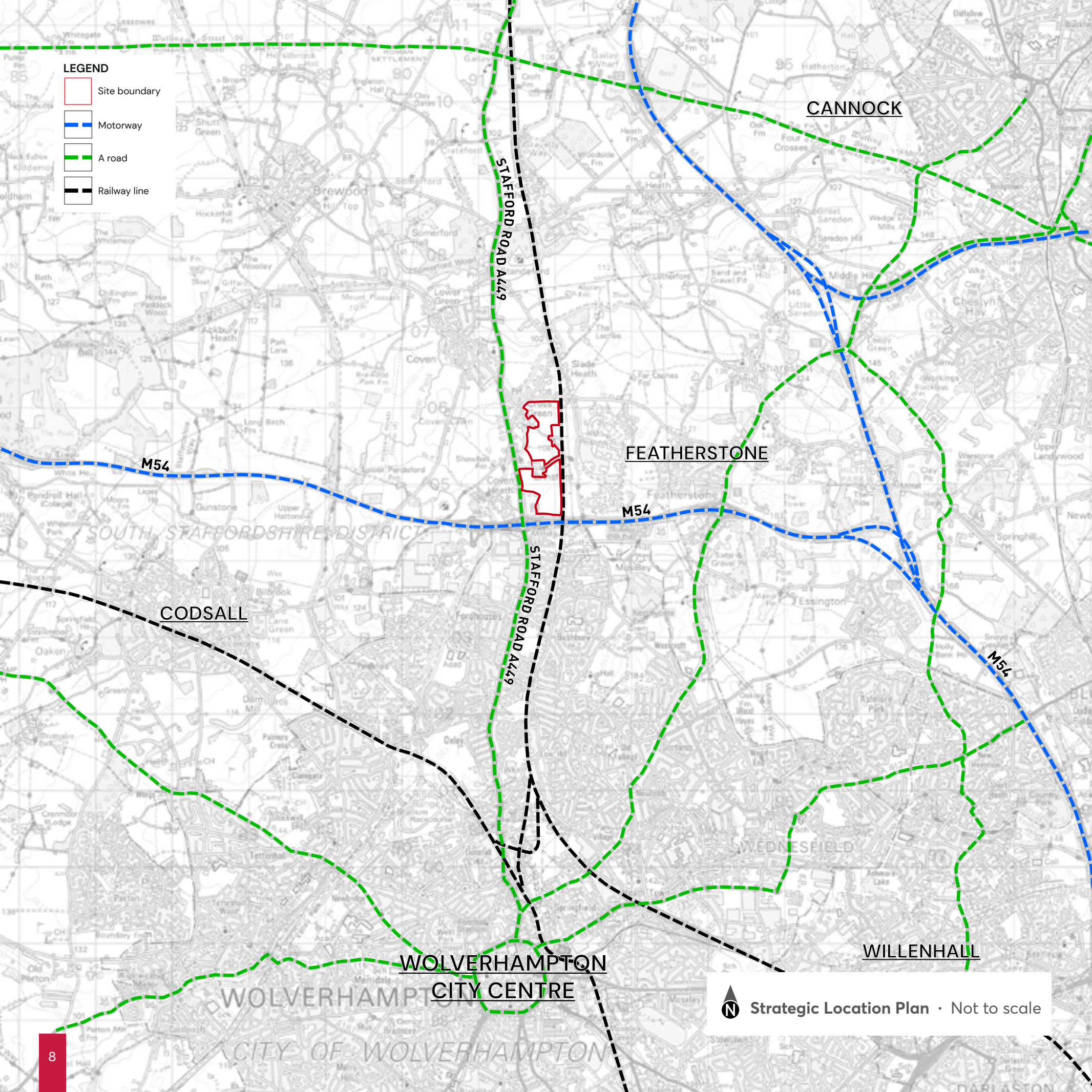
- 1.1 This document provides a vision for the development of a sustainable residential proposal with significant areas of public open space and other supporting infrastructure. It explains the technical work that has been carried out by Taylor Wimpey to inform our initial development vision for the site and forms the basis for more detailed consultation with South Staffordshire District Council, other key stakeholders and the local community to refine the proposals as appropriate.
- 1.2 Taylor Wimpey is one of the UK's leading housebuilders, being responsible for the delivery of over 10,000 homes annually. Taylor Wimpey is

committed to engaging with local communities to shape developments which best meet local needs and requirements. Further details of our company are set out in Appendix 1.

1.3 Taylor Wimpey has appointed a consultant team to assist in producing an appropriate development vision for the site. The principal team members comprise Evolve Planning & Design (Planning), Pegasus Group (Masterplanning, Economic Benefits), DTA (Transport), BWB Consulting (Flood Risk and Drainage, Air Quality, Noise) and EDP (Landscape, Arboriculture, Ecology, Heritage).

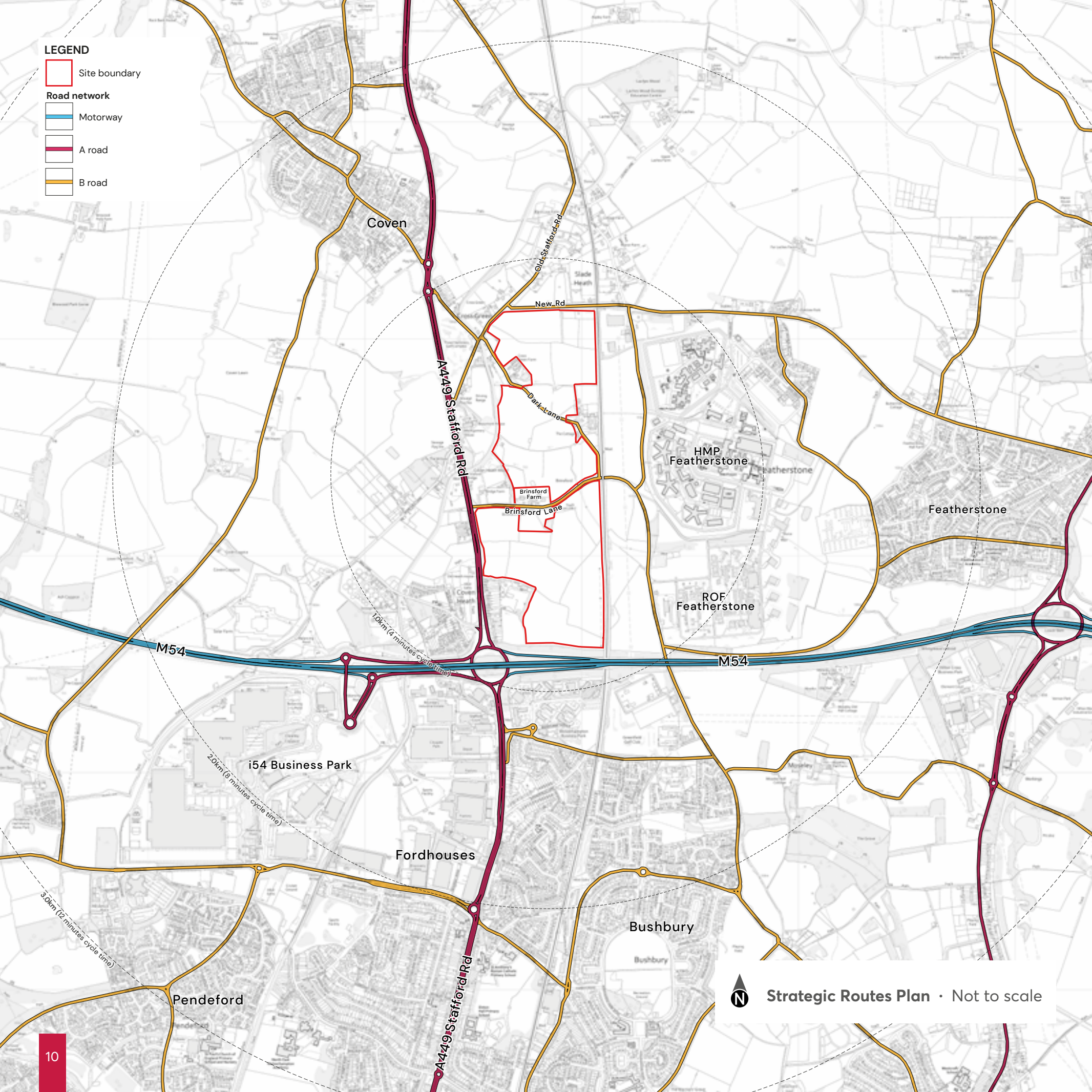
- 1.4 This document includes the following sections:
 - Section 2 – The Site & Surrounding Area
 - Section 3 – Policy Background
 - Section 4 – What is the Vision for the Site?
 - Section 5 – Site Analysis
 - Section 6 – The Proposal
 - Section 7 – Conclusion

THE SITE & SURROUNDING AREA



2.1 The site is located within South Staffordshire District, approximately 1.25km west of the village of Featherstone and approximately 6km north of Wolverhampton City Centre. There are wayside dwellings situated along the Stafford Road (A449) and the nucleated dwellings and farmstead around the site form the most immediate residential setting for the site.

2.2 The site comprises 64 hectares / 159 acres of agricultural land with a number of sub-dividing hedgerows. It is bound by the M54 and to the south, the West Coast Mainline railway line to the east, Stafford Road (the A449) and the Staffordshire and Worcestershire Canal to the west, with low density residential development and farmland to the north.



SITE CONTEXT AND LOCATION

- 2.3 The site is defined by the A449 Stafford Road to the west and the West Coast Mainline railway to the east. The city of Wolverhampton and employment zones including the new i54 Business Park form the southern context while the north of the site is bounded by agricultural land.
- 2.4 Featherstone village is located to the east of the site, Coven Heath to the west, and Cross Green, Slade Heath and Coven to the north.
- 2.5 The site is of a rectilinear shape but contains no development. The majority of the site comprises pastures fields, divided by robust hedgerows and mature hedgerow trees, with small woodland groups situated through the site.
- 2.6 The site is enclosed by existing communication routes including: (i) Old Stafford Road and New Road to the north; (ii) the West Midlands mainline railway which runs north to south along the eastern site boundary; (iii) the M54 Motorway to the southern site edge; and (iv) the Stafford Road (A449) dual carriageway along the western edge of the site.
- 2.7 The western boundary of the site is formed in part by the Staffordshire and Worcestershire canal, which is lined with robust vegetation and mature trees.
- 2.8 The site is dissected by two roads, the first of these being Dark Lane, a single-track carriageway running diagonally north-west to south-east through the centre of the site. This narrow country lane is enclosed by robust hedgerows, which define pastoral fields, giving the route a sunken feeling.
- 2.9 Secondly, Brinsford Lane, a two-lane carriageway runs west to east across the southern portion of the site. Along this lane, there are a small number of wayside dwellings, farmsteads and agricultural infrastructure including storage barns, including Brinsford Farm.
- 2.10 The site has a gentle undulating topography with high points located within the north-east and south-west elements of the site (approx. 110m aOD). The western edge, around Brinsford Lane and the Stafford Road (A449) sit at approximately 105m aOD.
- 2.11 There are no Public Right of Way (PRoW) or Public Access Land within the site. However, the towpath running along the Staffordshire and Worcestershire Canal affords public access along its route on the north-western edge of the site.
- 2.12 The Long Distance Walking Route – the Monarchs Way – passes east to west along Brinsford Lane before joining the wider PRoW network in the wider landscape to the east and west of the site. HM Prison Featherstone is situated approximately 0.25km east of the site, and the M54 Motorway to the south, and there are limited publicly accessible routes to the east and south of the site. Beyond the M54 to the south, the settlement of Wolverhampton further restricts the availability of PRoW.
- 2.13 The Monarchs Way Long Distance Walking Route runs along the Staffordshire and Worcestershire Canal outside of the site, linking with the Stafford Road (A449) and Brinsford Lane, as detailed above.
- 2.14 There are a number of PRoW situated to the north and west of the site; however, none afford direct access to the site

LAND CONTROL

- 2.15 The site, edged in red on the Site Location Plan (page 6), comprises approximately 64ha of agricultural land with Taylor Wimpey owning the freehold on the majority of this land.



Viewpoint from south-western edge of the site looking south towards the M54 Motorway



Viewpoint from south-western edge of the site looking south towards the M54 Motorway



View from Old Stafford Road on the Site's Western Boundary



Viewpoint from Public Right of Way outside of the site looking eastwards

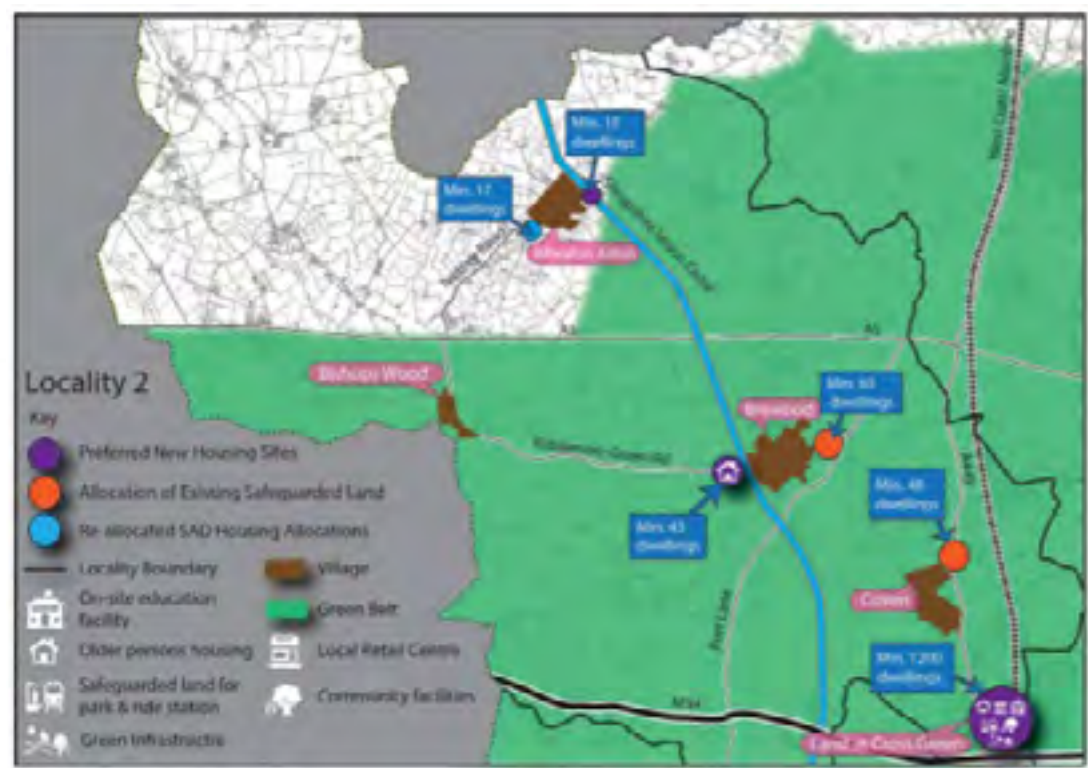


Viewpoint from Towing Path on Staffordshire and Worcestershire Canal outside of the western site boundary

PLANNING POLICY



South Staffs Local Plan Review Context Map
 • Not to scale



NATIONAL PLANNING POLICY

2.1 A revised National Planning Policy Framework (NPPF) was introduced in July 2021. The Government recognises that the planning system should be genuinely plan-led, with succinct and up-to-date local plans providing a positive vision for each local authority; a framework for addressing housing needs and other economic, social and environmental priorities that span a minimum 15 year period from adoption.

2.2 The NPPF requires local authorities to identify a sufficient amount and variety of land, that can come forward where it is needed, to support the Government's aim of significantly boosting the supply of homes. To determine the number of homes needed a local housing need assessment is required, conducted using the 'standard method.' This standard method identifies a housing need for South Staffordshire District of 243 dwellings per annum, including an uplift to take account of market signals and affordability.

2.3 Similarly, the standard method indicates that, collectively, the four Black Country authorities are obliged to deliver 4,004 dwellings per year, including a 35% uplift applied to the City of Wolverhampton.

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW

2.4 The current development plan commits the District Council to carrying out an early review of the development plan in order to respond to the increasing need for development, both within South Staffordshire and the wider housing market area.

2.5 Taylor Wimpey supports the District Council's decision to carry out a review to ensure an up to date planning policy framework is in place to shape the District to 2039. The review provides an opportunity to address housing need, reflect new national planning guidance and provide a meaningful contribution to meeting needs of neighbouring authorities, where it can be demonstrated that they are unable to do so.

2.6 The Preferred Options version of the Local Plan Review identified Land at Cross Green as a Strategic Development Location (SDL). This SDL was identified as a location for major housing growth comprising a minimum of 1,200 homes, a new primary school and village centre alongside land to deliver a new parkway railway station to serve existing and new residents. The Publication Plan confirms this site as a SDL.

MASTERPLANNING APPROACH

2.7 Since Land at Cross Green was identified as a Strategic Development Location in the Preferred Options document, Taylor Wimpey has worked collaboratively with the Council, the Council's masterplanning consultant and a range of key stakeholders to progress a Vision, Objectives and Concept Masterplan to underpin a Development Framework Plan contained within this Vision Document.

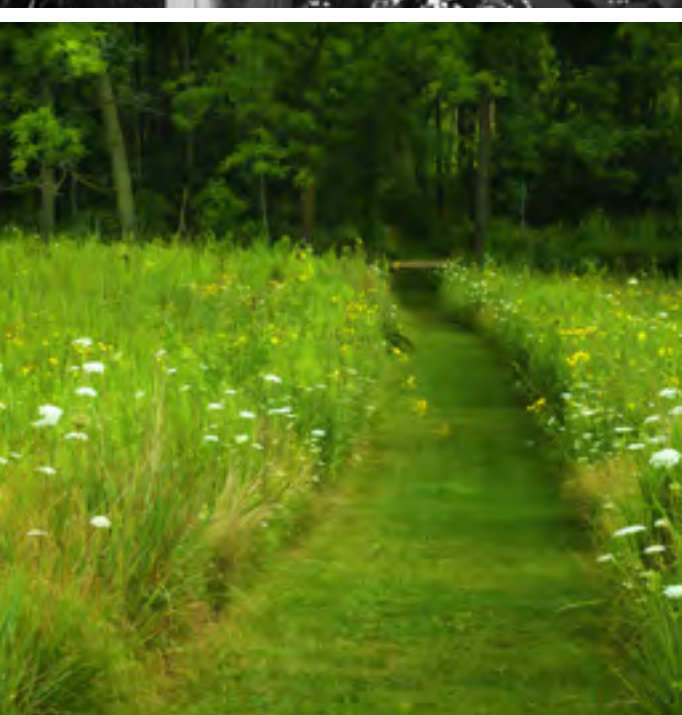
2.8 In line with draft Policy MA1, Taylor Wimpey is committed to preparing a strategic masterplan through further stakeholder and community engagement to inform the preparation of a planning application in due course.

South Staffordshire Council
Core Strategy
 December 2012

Further information can be found at www.sstaffs.gov.uk



WHAT IS THE VISION FOR THE SITE?



4.1 The masterplanning process to date has identified the following Vision and Objectives which are to inform a new high quality, sustainable new village at Cross Green.

“Land at Cross Green will be a thriving, sustainable and beautiful modern Staffordshire village. It will be landscape led and deliver high quality, distinctive development respecting and enhancing the area’s existing natural assets, landscape and key views.

The development will be relatively self-contained and provide a balance of environmental, economic and social opportunities for future residents, whilst complimenting and meeting the needs of the existing nearby communities. There will be a new neighbourhood centre and

community park at its heart, delivering new space for community, retail and local business/employment opportunities. The new homes and facilities will increase the range of opportunities for existing and future residents.

The development will be well-connected to the existing network of public rights of way, footways and highways and the surrounding countryside with improved public transport, cycling and walking links.

The connections will enhance access to nearby employment opportunities and to future public transport, including a new rail station which will provide an integrated local transport hub. The design and layout of the development will encourage and enable sustainable

movement, encouraging active travel to services and facilities, including the new neighbourhood centre, rail station and community facilities, within a framework of walkable neighbourhoods, utilising a clear hierarchy of streets and new greenways.

High quality and distinctive design, integrated within a green and blue infrastructure framework, extending throughout and beyond the new development, will deliver a strong sense of place and identity. The development will focus on achieving high environmental standards, energy efficiency and a regulated net zero carbon community.”

ENVIRONMENTAL OBJECTIVES

Transport & Movement

- 4.2 The new settlement will be permeable and prioritise active travel and walkable neighbourhoods, with a safe and secure hierarchy of connected streets and routes including strong cycling and walking infrastructure throughout the site and beyond.
- 4.3 Connections with and improvements to sustainable travel infrastructure such as the new rail station and the local footpath and cycleways will be prioritised and provided.
- 4.4 Streets will be tree lined where relevant and all streets should be connected, safe and secure as part of an overall site wide movement framework.
- 4.5 Defined character areas will be created within the site, seeking to respond to the existing physical surroundings/context of the site and the movement framework/hierarchy.

Housing & Built Environment

- 4.6 Provide a high quality, well-designed and innovative housing mix to create a balanced community and accommodate a range of people from first time buyers, young families and the elderly.
- 4.7 Inclusion of a variety of building forms relevant to specific character areas (not high rise). Buildings should be well insulated and energy efficient with potential to utilise modern methods of construction and provide opportunities for self-build.

Environmentally Sensitive

- 4.8 A high-quality site wide network of integrated green infrastructure, including existing environmental assets, natural capital corridors and SuDS, will enable connectivity and sustainable movement, mitigate and utilise flood zones and contribute to a 10% net gain in biodiversity.
- 4.9 Tree lined streets will be provided to soften hard infrastructure and promote biodiversity corridors and hubs throughout the settlement.
- 4.10 A new community park will be provided at the heart of the new settlement and connected to the wider green infrastructure and movement framework.

ECONOMIC OBJECTIVES

Well Served & Thriving

- 4.11 The provision of a new neighbourhood centre will be provided centrally to the development to accommodate relevant facilities/services for the new settlement and existing nearby communities to include local retail, flexible community space and local employment.
- 4.12 Provide new residents with excellent active travel links to key strategic employment sites (ROF Featherstone, i54)
- 4.13 A new primary school will also be provided at the heart of the development to ensure it is accessible by all.
- 4.14 The new neighbourhood centre will form a positive relationship with the new rail station in respect of mutual services, amenities and parking.

SOCIAL OBJECTIVES

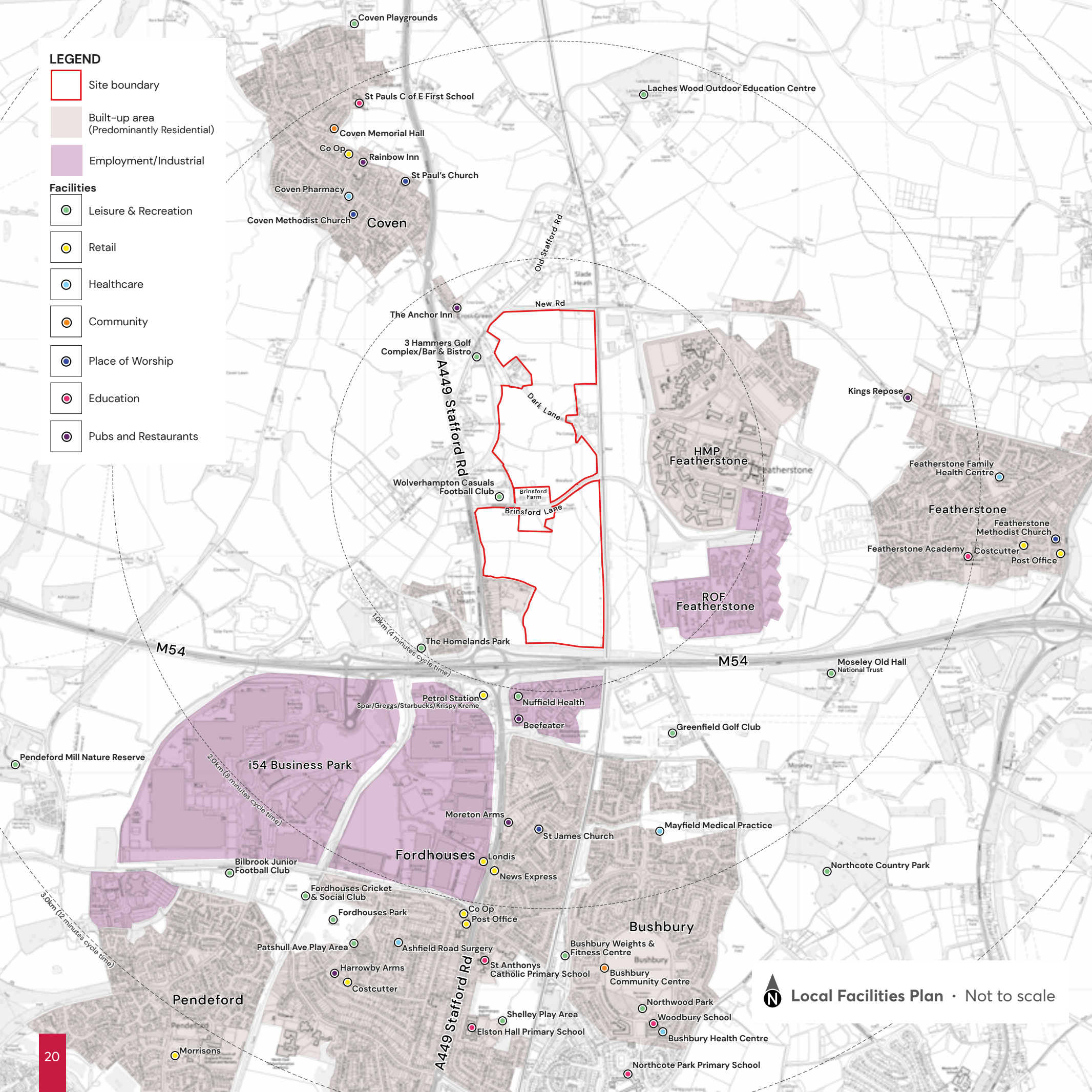
Active, Inclusive & Safe

- 4.15 Active travel will be prioritised throughout the settlement to encourage walking/cycling whilst also reducing the risk of air pollution from traffic within the site.
- 4.16 A range of suitable homes will be provided to meet established needs in respect of size, type, tenure and affordability in order to realise a balanced community.
- 4.17 Provision of flexible community/employment space will allow opportunities for future residents to meet and organise a range of activities and groups as required.
- 4.18 The inclusion of communal gardens and informal spaces will help promote a sense of community and social inclusion.

Well run

- 4.19 The existing and new residents within the community should be engaged to consider the future stewardship of the place and in particular the design, delivery and future management of the new facilities.

SITE ANALYSIS



IS THE SITE IN A SUSTAINABLE LOCATION?

- 5.1 The development site is situated west of ROF Featherstone and is located between the A449 Stafford Road to the west and the West Coast Mainline (WCML) to the east. The M54 routes to the immediate south of the site and New Road to the north.
- 5.2 Featherstone village is located to the east of the site, Coven Heath to the west, and Cross Green, Slade Heath and Coven to the north. To the south of the site is Wolverhampton, which includes the nearby i54, Boundary Industrial Estate and Wolverhampton Business Park.
- 5.3 In terms of sustainable access, the site is well located to take advantage of existing and proposed foot, cycle and public transport services in the local area. The scale of potential development also lends itself to the provision of on-site amenities. Opportunities for maximising connectivity between the proposed development and the local area are discussed in this report, and would need to be revisited in detail at the appropriate stage.

- 5.4 Foot and cycle facilities within the vicinity of the site are currently limited; however, there is significant scope to improve active travel connectivity as part of the development proposals and a package of enhancements have been identified as part of the adjacent ROF Featherstone proposal.
- 5.5 The nearest existing bus services to the site are to the west of the proposed development, accessed from the A449 Stafford Road. The nearest rail station to the site is Wolverhampton Station located around 7km to the south. The station provides frequent train services to numerous destinations including Stafford, Birmingham, Manchester and London. West Midlands Metro services are also available in Wolverhampton, providing access to/ from the West Midlands conurbation.
- 5.6 The development proposals, provides an opportunity to assist in the delivery of a new parkway railway station on the adjacent WCML which bounds the east of the site and to provide a wide range of new services and facilities to reduce the need to travel.

SUSTAINABILITY BENEFITS

- 5.7 The site will deliver significant benefits in relation to the “three dimensions” of sustainable development as set out in the NPPF. The site facilities the delivery of employment led housing growth on a mixed use site, supported by social and community infrastructure.

TECHNICAL ASSESSMENTS

- 5.8 Taylor Wimpey carried out various baseline technical assessments including flood risk, highways, landscape, heritage, utilities, noise, air quality and ecology. These were reviewed as part of the Council’s masterplanning process. Summaries of the key findings and recommendations are to be found on the following pages.



St Pauls C of E First School



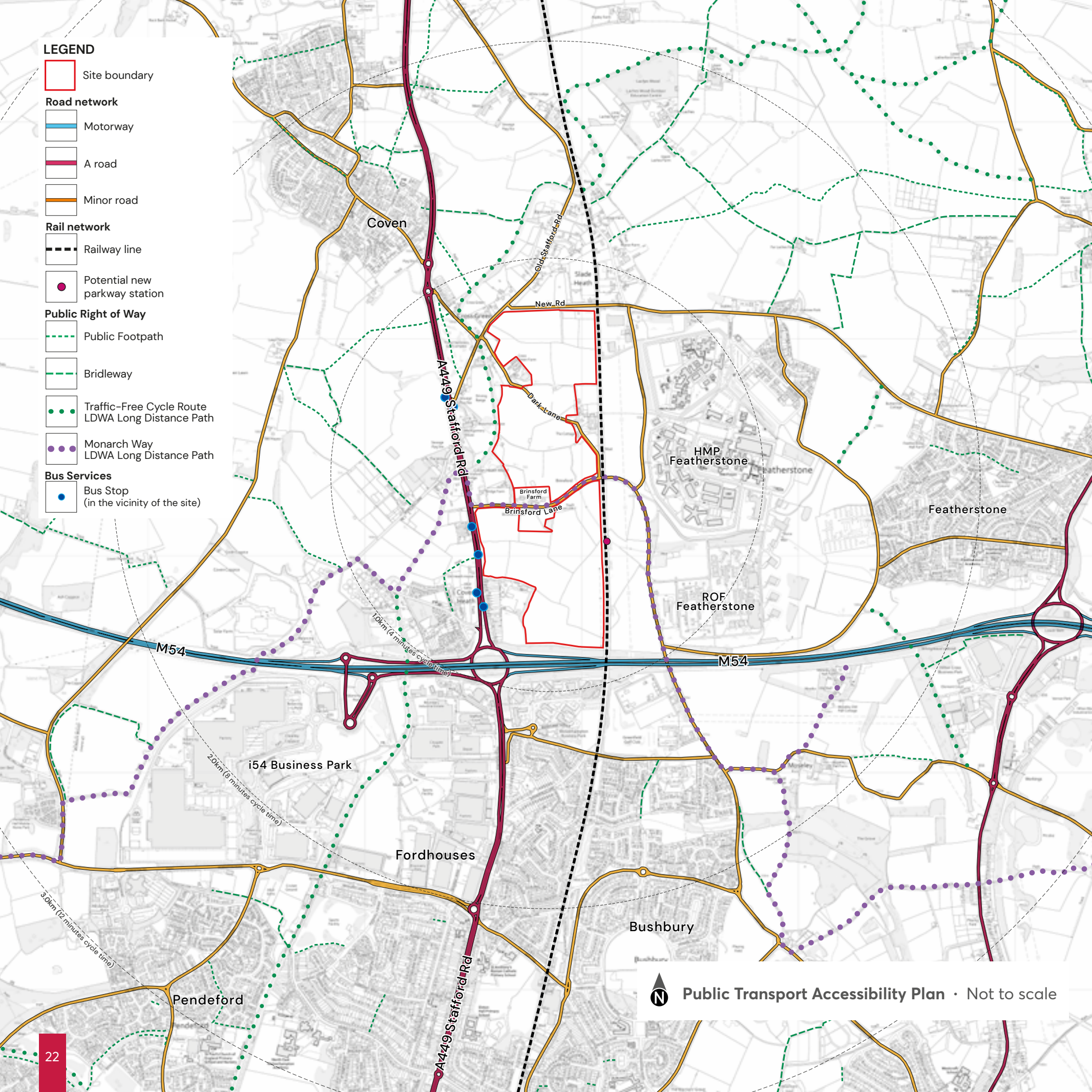
Mayfield Medical Practice



Bentley Bridge Retail Park

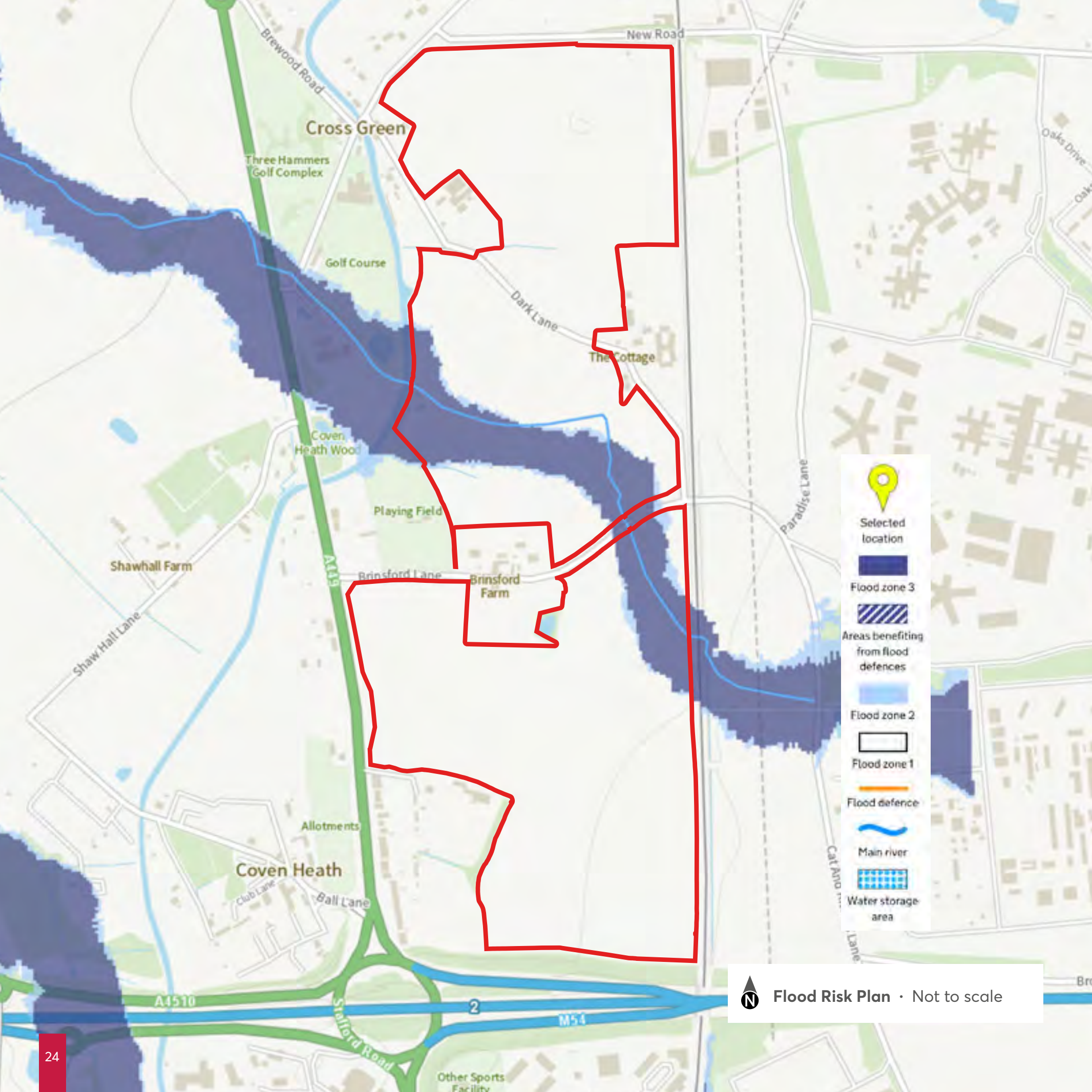
LEGEND

- Site boundary
- Road network**
- Motorway
- A road
- Minor road
- Rail network**
- Railway line
- Potential new parkway station
- Public Right of Way**
- Public Footpath
- Bridleway
- Traffic-Free Cycle Route
LDWA Long Distance Path
- Monarch Way
LDWA Long Distance Path
- Bus Services**
- Bus Stop
(in the vicinity of the site)



HIGHWAYS AND TRANSPORTATION

- 5.9 Foot and cycle facilities within the vicinity of the site are currently limited; however, there is significant scope to improve connectivity as part of the development proposals and a package of enhancements have been identified as part of the adjacent ROF Featherstone application.
- 5.10 The nearest existing bus services to the site are to the west of the proposed development, accessed from the A449 Stafford Road.
- 5.11 The nearest rail station to the site is Wolverhampton Station located around 7km to the south. The station provides frequent train services to numerous destinations including Stafford, Birmingham, Manchester and London. West Midlands Metro services are also available in Wolverhampton, providing access to/ from the West Midlands conurbation. There is significant scope to improve public transport connectivity as part of the development proposals, which includes the potential for a new parkway station on the adjacent West Coast Mainline which bounds the east of the site.
- 5.12 It is proposed that primary vehicle access to the site be taken from the proposed Road Option 7 to be constructed between the A449 Stafford Road and Cat and Kittens Lane, over the WCML, to facilitate the delivery of the adjacent ROF Featherstone employment application.
- 5.13 The link road will comprise a 7.3m wide single carriageway with a 2m wide footway along the northern side of the carriageway, and a shared 3m wide foot/ cycleway to the south. The majority of the road will be at-grade, rising on a series of embankments as it crosses over the railway to link with Cat and Kittens Lane.
- 5.14 Secondary points of vehicle access are proposed onto Brinsford Lane and New Road. Separate pedestrian/ cycle access points are also proposed, which will form part of a pedestrian and cycle priority route through the site.
- 5.15 Internally, the site would include a principal spine road in conjunction with a number of primary and secondary streets.
- 5.16 A Transport Assessment will be completed to assess impacts across the wider network, this will include speed survey work. The Transport Assessment will take account of any local committed development sites and any committed highway improvements. Suitable mitigation will be provided as part of the development proposals including any identified off site highway works and contributions.



FLOOD RISK AND DRAINAGE

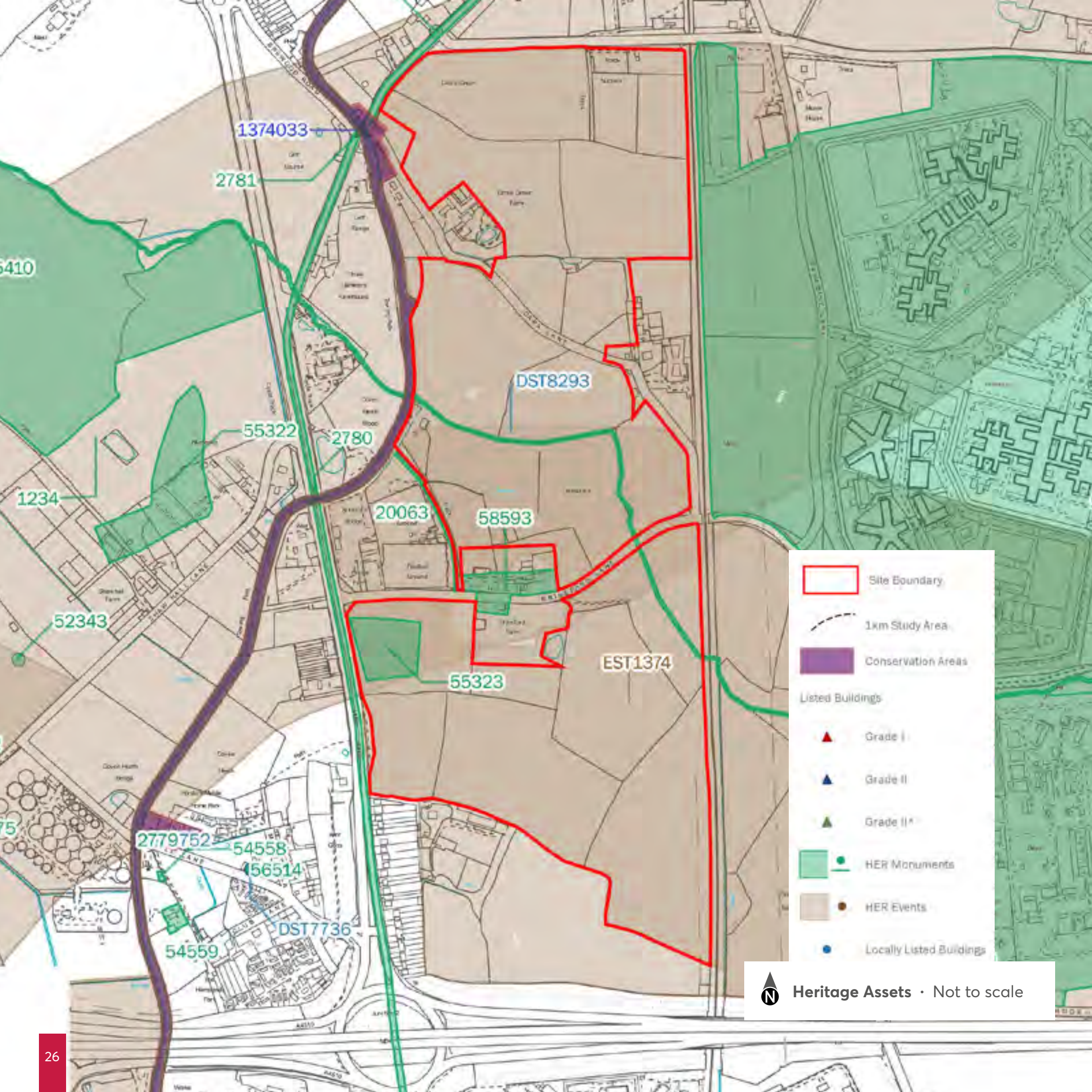
5.17 The site is crossed by an un-named tributary of the River Penk. The published Environment Agency flood maps shows surface water flooding (Flood Zones 2 & 3) associated with the tributary although the flood zone extents do not entirely match the geometry of the channel. Therefore detailed site-specific hydraulic modelling is required to give a more accurate representation of the floodplain.

5.18 There are a number of minor watercourses on site associated with existing field boundaries and will be considered as part of a site wide drainage network.

5.19 The Staffordshire and Worcestershire Canal is not considered to pose a risk of flooding.

5.20 To mitigate against the potential impact of increased surface water run-off, the masterplan will limit surface water runoff to existing greenfield rates plus an allowance for climate change. The drainage strategy will include:

- Sustainable drainage features that will include storage basins and swales across the development.
- The opening up of the culverted watercourses to reduce chance of blockages in the future.



The brook edged with hedgerows which form internal field boundaries within the site



Views across the site, looking east, from the conservation area

HERITAGE

5.21 The site does not contain any designated heritage assets, such as scheduled monuments, listed buildings or conservation areas.

5.22 There are five listed buildings within the study area, although it is considered that the site makes no contribution to the setting of these buildings, and in any case factors of built form and distance between the building and the site preclude any impact. Therefore, their heritage significance will be unaffected by the proposals and will have no bearing on the deliverability or capacity of the site.

5.23 There is one conservation area within the 1km study area: the Staffordshire and Worcestershire Canal. No historical or functional connection has been identified between land within the site and the conservation area and no potential for any direct impact has currently been identified as a result of the future allocation and development of these areas.

5.24 There is potential for development within the site to affect the setting of the conservation area. Further assessment would be required to feed into development design and measures to preserve and enhance the canal.

5.25 A locally listed brook crosses the site. There is potential for development within the site to affect this asset, both through direct impacts and effects on its setting. Further assessment would therefore be required to feed into development design, although it is considered that appropriate measures could be incorporated such that any harm could be effectively mitigated; thus, this would be unlikely to have a bearing on the deliverability of the site for development.

5.26 An area of ridge and furrow cultivation, identified from cropmarks, lies within the southern part of the site. No above ground remains of this survive and this would not constrain the development of the site.

5.27 No other archaeological remains have been identified within the site, although as with any greenfield site there is some potential for further archaeological remains that have not currently been identified. However, there is no expectation that any such remains would be of sufficient significance as to constrain the deliverability or capacity of the site for development.

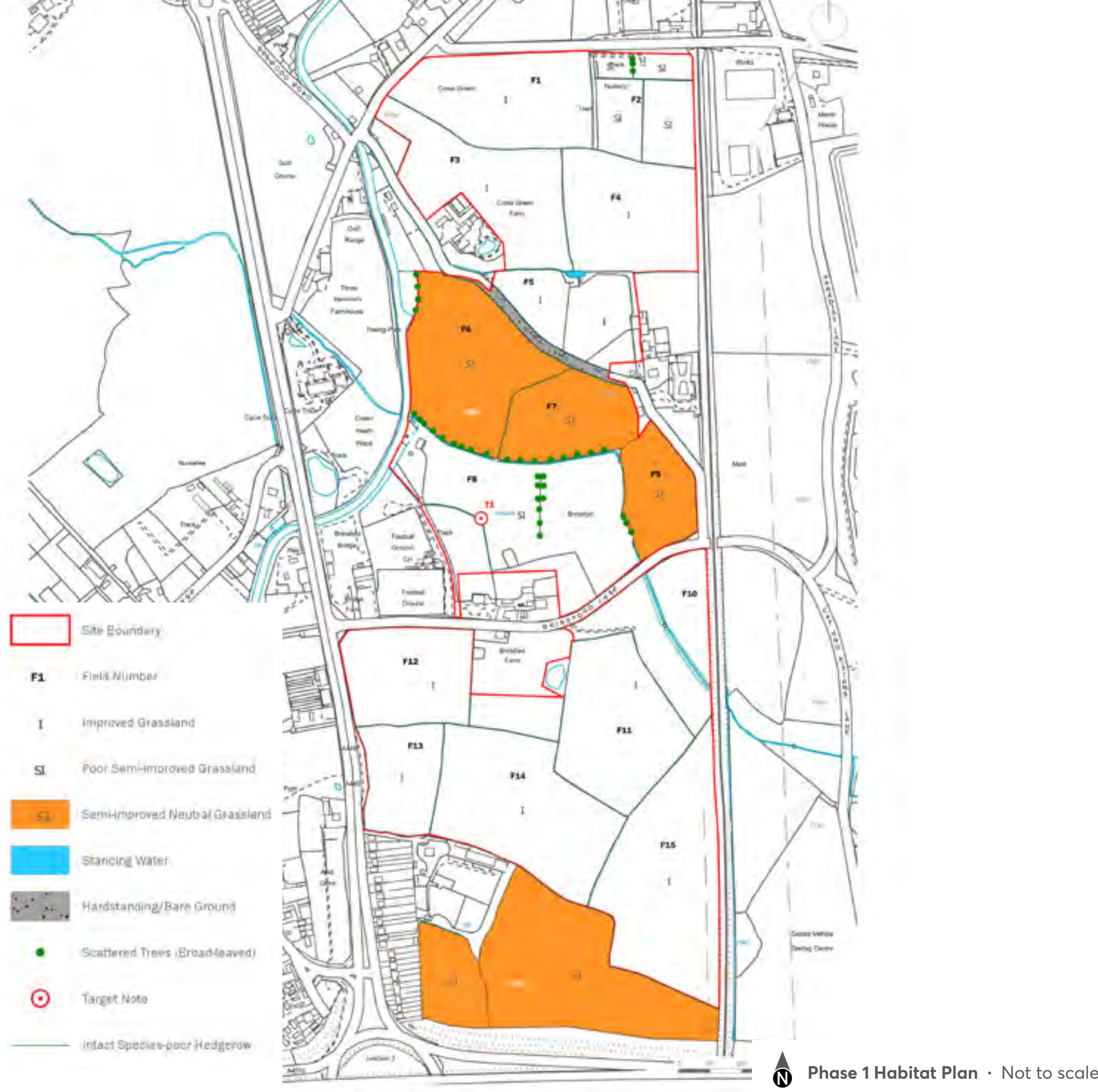
5.28 According to the current baseline, there is therefore no evidence to suggest that the development of this site could not accord with the legislative considerations of the Planning (Listed Buildings and Conservation Areas Act) 1990, the National Planning Policy Framework and the policies contained within the local plan.



Grade II Listed Staffordshire and Worcestershire Canal Number 71 (Cross Green Bridge), situated within the canal system



Rural setting of the conservation area. Pastoral views on the east and a tree hedgerow on the west, containing the setting of the conservation area and screening it from a golf course



ECOLOGY

- 5.29 An ecology desk study and Extended Phase 1 Habitat survey have been undertaken and have identified the following valuable ecological features within and adjacent to the Site:
- 5.30 Presence of Cannock Chase SAC 10 km north east of the Site;
- 5.31 Locally designated areas of semi-natural habitat adjacent to the boundaries of the Site;
- 5.32 Hedgerows, a water course, areas of potentially species rich grassland and mature trees within the site; and
- 5.33 Potential for great crested newts, breeding birds and foraging bats to be present (presence to be confirmed by further survey work).
- 5.34 It is considered the majority of impacts on habitats and protected species (if present) can be avoided/mitigated/compensated for through the retention and enhancement of key features within the site through masterplanning as follows:
- 5.35 Retention/buffering, where possible, of the on-site habitats and immediately adjacent semi-natural habitats, in particular the hedgerows, potentially species rich grassland, canal, rail line and the unnamed water course;
- 5.36 Enhancement of existing hedgerow network, where retained, through selective 'gap' planting with native hedgerow species of local provenance and long-term management for the benefit of wildlife;

- 5.37 Provision of good-quality informal green space to offset any recreational impacts on Cannock Chase SAC;
- 5.38 Creation of areas of species-rich wildflower grassland within any areas of retained informal green open space;
- 5.39 Incorporation of a range of bat and bird boxes on retained trees to provide new roosting and nesting opportunities;
- 5.40 Wildlife-sensitive lighting scheme to minimise the effects of artificial lighting on commuting and foraging bats and other nocturnal wildlife; and
- 5.41 Provision of Sustainable Drainage Systems (SuDS) features designed to benefit biodiversity through appropriate design, planting and management of surrounding green open spaces.
- 5.42 It is concluded there are no obvious 'in principle' (significant) ecological constraints that would preclude development, and which cannot be avoided by good design. Moreover, the site and wider land parcel presents an opportunity to deliver a net gain to local biodiversity and contribute to the objects of the Staffordshire Biodiversity Action Plan as well as ensuring local and national policy compliance.





N Noise Day Time · Not to scale



N Noise Night Time · Not to scale

NOISE

5.43 A detailed noise model has been generated in order to quantify noise levels from road traffic on New Road, Brinsford Lane, the A449 Stafford Road and the M54 motorway, and from rail movements on the West Coast Mainline upon the site.

5.44 Based on the results of the noise and vibration surveys and subsequent acoustic modelling, it is considered that the site is acceptable from a noise and vibration perspective. The following recommendations were identified to influence the masterplan:

- Where possible, the proposed residential areas should remain outside of the 70-75dB and 65-70dB noise contours to remove the need for additional noise mitigation;

- Gardens closest to the each of the transportation sources should face away from the sources, and placed behind buildings so as to be effectively screened;
- Consideration should be made to the build line on each aspect of the site. Choosing to build at a distance of 20m from the RLB will be more beneficial acoustically in comparison with building at 10m from the RLB; and
- Gardens closest to Cross Green Farm Boarding Kennels and Birmingham Dogs Home should be placed at a setback distance of approximately 20m, or behind buildings so as to be effectively screened.

5.45 By adopting the above mitigation strategies it is concluded the site can offer an appropriate acoustic environment for future residential use.

UTILITIES

5.46 Severn Trent Water sewer records show that a 750mm surface water sewer and a 375mm foul water sewer cross the site. The surface water sewer will remain in place with a 5 metre no-build zone from the centreline, whilst it is intended for the foul sewer to be diverted. There will be a high pressure gas pipeline and stand off provided.



SITE OPPORTUNITIES AND CONSTRAINTS

OPPORTUNITIES

- An opportunity to create a vibrant, sustainable and well connected urban village on the outskirts on the West Midlands conurbation.
- Land available to create opportunity for future rail links that could connect to major urban centres and the wider national rail movement network.
- The proposed road infrastructure will provide direct access to the motorway system and allow national movement for residents.
- Opportunity to create a new urban village that will cater for all needs and requirements.
- Opportunity to create a clear and legible movement hierarchy with clear distinction and way finding opportunities.
- Creation of a new rail halt car park allowing a park and ride to operate from the site.
- Community primary school to be provided on site for new and existing residents.
- A central Village Hub will seek to provide residents with shopping and community pursuits on site.
- Creation of new public open spaces that will provide occasions for new and existing residents to socialise and spaces to spend leisure time.
- Provide a range of housing that will meet the needs of local people.
- Creation of new leisure routes that will connect with the local infrastructure.
- Development will seek to retain existing green infrastructure and enhance where possible.
- Opportunity to extend existing green infrastructures through planting of new woodland buffers and wetland planting along flood plains.

CONSTRAINTS

- The site is situated directly adjacent to the M54 that will have acoustic impacts on the site.
 - The site has the Wolverhampton to Stafford main line railway running directly to the eastern boundary that will have further acoustic implications
 - The site has a flooding issues centrally that the development will need to respond to.
 - The sites red line is dissected by Brinsford Lane. Development will have to provide safe and secure crossing points for pedestrians and cyclists.
 - The site is sited along the Staffordshire and Worcestershire Canal conservation area, development will have to seek to not disrupt the function and character of the water body/conservation area.
 - The site is located within the green belt directly north of Wolverhampton.
 - The site will still have to provide access to the Birmingham Dogs home and not disrupt day to day running of the centre.
 - Granary Cottage is located near the sites boundary and will have to be buffered appropriately as not to impact on the character of the listed building.
 - A new roundabout access will have to be constructed to facilitate development via the A449.
- 5.1 The site benefits from a lack of any significant physical or environmental constraints and provides the opportunity to deliver housing development in a sustainable location which will integrate with existing built development and provide a soft transition to the surrounding countryside.

THE PROPOSAL



Development Framework
 • Not to scale

KEY

- SITE BOUNDARY (TBC) 88.91 HA / 219.51 ACRES
- LAND SAFEGUARDED FOR THE CONSTRUCTION OF THE RELIEF ROAD
- POTENTIAL SITE ACCESS VIA BRINSFORD LANE, NEW ROAD AND OLD STAFFORD ROAD
- PROPOSED HIGH DENSITY RESIDENTIAL DEVELOPMENT PARCELS
- PROPOSED MEDIUM DENSITY RESIDENTIAL DEVELOPMENT PARCELS
- PROPOSED LOW DENSITY RESIDENTIAL DEVELOPMENT PARCELS
- PROPOSED CENTRAL VILLAGE HUB 0.89 HA / 2.2 ACRES
- POTENTIAL LOCATION FOR PRIMARY SCHOOL 1.8 HA / 4.5 ACRES
- POTENTIAL PARKING FOR RAIL HALT 1.47 HA / 3.6 ACRES (UP TO 500 SPACES)
- TOTAL PUBLIC OPEN SPACE (EXC. SUBS) 23.79 HA / 58.8 ACRES
- ROUNDABOUT ACCESS VIA STAFFORD ROAD
- PROPOSED DISTRICT ROAD MOVEMENT
- PRIMARY MOVEMENT ROUTE (INCORPORATING CYCLE AND PEDESTRIAN MOVEMENT)
- SECONDARY MOVEMENT ROUTE
- TERTIARY LINK ROAD MOVEMENT
- PRIVATE LANE MOVEMENT
- EXISTING RAIL MOVEMENT PROVIDING ACCESS TO NEARBY URBAN CENTRES
- PROPOSED NEW RAIL HALT STOP
- POTENTIAL PEDESTRIAN CROSSING POINT (TBC)
- PUBLIC RIGHT OF WAYS
- POTENTIAL PEDESTRIAN AND CYCLE ROUTES WITHIN DEVELOPMENT
- POTENTIAL PEDESTRIAN ROUTES WITHIN DEVELOPMENT
- EXISTING VEGETATION
- PROPOSED STRUCTURAL PLANTING PROVIDING A REDUCTION IN ACOUSTIC DISTURBANCE
- PROPOSED WETLAND WOODLAND PLANTING
- ORNAMENTAL PLANTING
- COMMUNITY ORCHARD PLANTING
- NEIGHBOURHOOD EQUIPPED AREA OF PLAY
- LOCALLY EQUIPPED AREAS OF PLAY
- AREA OF NATURAL PLAY
- COMMUNITY TRIM TRAIL ROUTE
- COMMUNITY ALLOTMENT SPACES
- CONFIRMED EXTENTS OF FLOOD LINE
- SUSTAINABLE (URBAN DRAINAGE) (TBC)
- CADENT GAS MAIN PIPE LINE 12M BUFFER
- EXISTING FOUL WATER SEWER TO BE DIVERTED (TBC)
- EXISTING WATERCOURSE WITH 1M EASEMENT

COMBINED TOTAL QUANTUM = 1200 UNITS

APPROACH

6.1 Taylor Wimpey has developed a Development Framework Plan which reflects the opportunities and constraints of the site and seeks to deliver the vision and objectives reached through the masterplanning process to date. This Masterplan will evolve further as a result of future consultations with South Staffordshire District Council, the local community and other key stakeholders.

KEY PRINCIPLES

1. POTENTIAL ACCESS VIA NEW ROUNDABOUT AND DISTRICT ROAD OFF EXISTING STAFFORD ROAD (A449).
2. POTENTIAL ACCESS VIA BRINSFORD LANE, NEW ROAD AND OLD STAFFORD ROAD.
3. PRIMARY RESIDENTIAL MOVEMENT PROVIDING GREEN FORMS OF MOVEMENT.
4. SECONDARY MOVEMENT ROUTES PROVIDING ACCESS TO LARGER PARCELS OF DEVELOPMENT.
5. TERTIARY MOVEMENT ROUTES PROVIDING ACCESS TO SMALLER CLUSTERS OF DEVELOPMENT.
6. PRIVATE LANES WITH OUTWARD FACING DWELLINGS PROVIDING PASSIVE SURVEILLANCE OVER PROPOSED OPEN SPACE.
7. POTENTIAL LOCATION FOR PROPOSED PRIMARY SCHOOL.
8. POSSIBLE LOCATION FOR A CENTRAL VILLAGE HUB PROVIDING OPPORTUNITIES FOR RETAIL AND COMMUNITY USES.
9. NEWLY PROPOSED RAIL HALT STATION PROVIDING SUSTAINABLE FORMS OF MOVEMENT.
10. A SERIES OF LANDSCAPED VILLAGE GREENS OFFERING LOCATIONS FOR EQUIPPED AREAS OF PLAY AND SPORTING PURSUITS.
11. NEWLY CREATED "CANALSIDE WALK" LINEAR PARK PROVIDING A LANDSCAPED BUFFER TO THE EXISTING CANAL NETWORK PROVIDING LEISURE AND SOCIAL OPPORTUNITIES FOR RESIDENTS.
12. COMMUNITY ALLOTMENTS TO BENEFIT NEW AND EXISTING RESIDENTS.
13. PLANTED COMMUNITY ORCHARD RETURNING THE AREA TO ITS HISTORIC LAND USE.
14. PROPOSED LOCATION FOR COMMUNITY TRIM TRAIL PROVIDING OPPORTUNITIES FOR COMMUNITY EXERCISE AND SOCIAL INCLUSION.
15. MAXIMUM RETENTION OF EXISTING VEGETATION AND ECOLOGY ON SITE.
16. WETLAND WOODLAND PLANTING AIDING BIO-DIVERSITY AND ECOLOGY ON SITE.
17. NEW STRUCTURAL WOODLAND PLANTING TO CREATE AN ACOUSTIC BARRIER TO EXISTING AND PROPOSED MOVEMENT INFRASTRUCTURE.
18. SERIES OF THEMED GREENWAYS HELPING TO RETAIN EXISTING ECOLOGY WITH OPPORTUNITIES FOR ENHANCED PLANTING AND OPEN EXPANSES OF AMENITY GREENSPACE.
19. MAXIMUM PROVISION FOR PEDESTRIAN MOVEMENT TO PROVIDE MAXIMUM PERMEABILITY THROUGHOUT THE DEVELOPMENT.
20. UTILISATION OF EXISTING SITE LOW POINTS FOR SUSTAINABLE URBAN DRAINAGE SOLUTIONS.
21. 20M NOISE CONTOUR BUFFER AND
22. POTENTIAL FOOTBALL PITCHES.

LEGEND

- Site boundary
- Land Use**
- 1,200 new homes and additional specialist elderly units
- Accessible Greenspace (inc. outdoor sports facilities, children's play, orchards, SuDS & habitat creation)
- New FTE Primary School (1.6ha)
- Community Hub (community space, flexible employment hub, retail & other commercial floorspace to support day to day needs of residents & nearby communities)
- Rail halt station provision
- Link road to serve new employment site



LAND USE

- 6.2 The development will seek to provide approximately 1,200 new modern homes for the district's growing population providing a range of different size and tenured properties. Additionally, the development will deliver 40 additional specialist living accommodation for elderly residents. A range of densities will be applied across the site.
- 6.3 A primary school will be provided on site to cater for a growing younger population while also providing future spaces for existing younger residents

Community Hub

- 6.4 The development will afford a range of different community use spaces and buildings ranging from:
 - Community Hub spaces. These spaces will offer new and existing residents the space to meet for social activities, play, recreational hobbies and using public services.
 - Flexible employment hub spaces will offer new and existing residents the opportunity to work remotely and provide inclusive and collaborative working spaces.
 - Retail and shopping spaces will meet the needs of new and existing residents by providing retail units for day-to-day goods, potential food outlets and engaging in public services.

Accessible greenspace

- 6.5 The development will seek to provide a wealth of publicly accessible green open space with varying uses. These will range from:
 - Outdoor sporting facilities for all ages and skill levels through community trim trails and sports pitches.

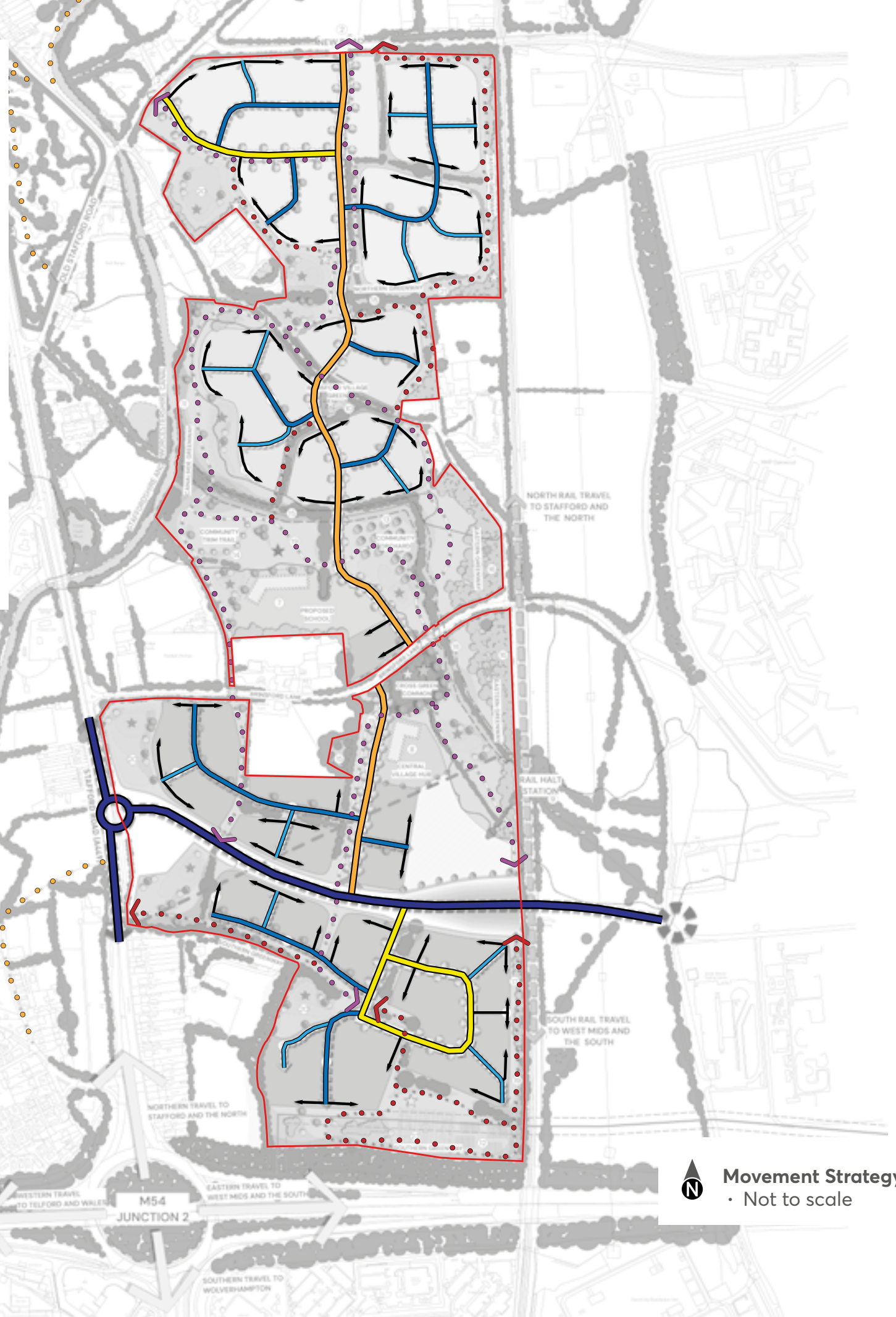
- A varying range of play spaces/ meeting spaces aimed at younger and teenage residents.
- A newly planted community orchard will provide residents with opportunities for natural foraging, community pursuits and a space for social inclusion.
- New planting schemes along the railway edge and motorway edge will provide new habitats for wildlife and aid enhancement of the site's biodiversity.
- Proposed community allotments will offer residents the opportunity to become self-sufficient and grow their own produce.
- New pedestrian/cycle leisure routes will be fully circulatory and will run into every corner of the site maximising pedestrian permeability throughout the development.
- 6.6 A key focus of the development will be to retain existing vegetation on site and enhance the existing green infrastructure with new planting schemes. These will range from:
 - Where possible all existing tree and hedgerow belts will be retained to maximise foraging routes and habitat creation for wildlife.
 - Additional planting buffers will be provided along the eastern and southern boundaries which offer further wildlife enhancements.
 - Wildflower planting along the Canalside edge and existing brook course will bring new species and biodiversity to the site.
 - The site will seek to enhance its existing wetland habitats by providing additional Sustainable drainage solutions which can offer enhancement of biodiversity and habitat creation.

Integrated sustainable transport

- 6.7 Sustainable travel will be one of the main focuses for the site. Given the proximity of the site to major urban centres and existing travel routes, a new bus service is to be accommodated on site.
- 6.8 Land will be safeguarded for a new rail halt station and associated car park along the Wolverhampton to Stafford line. This safeguards the opportunity in future for residents to be able to access nearby urban centres, which will offer access to national and international rail services.
- 6.9 On site pedestrians and cyclists will be able to connect throughout the development and out to the wider movement infrastructure. Potential connections to nearby employment centres accessible within 20-minute walk/cycle offering residents green forms of movement and exercise.
- 6.10 A new bus route is proposed to run through the development offering every resident the opportunity to be within a ten-minute walk of a local bus service.
- 6.11 Additional active travel improvements to surrounding infrastructures is proposed to aid the influx of additional users on existing movement routes.
- 6.12 The provision of a new link road is proposed to run from the existing A449 Stafford Road to proposed strategic employment site east of the Wolverhampton-Stafford rail line. This will offer new employment opportunities for existing residents throughout the district.

LEGEND

- Site boundary
- Access & Movement**
- Potential roundabout access via Stafford Road
- Proposed district road movement
- Primary movement route (inc. cycle & pedestrian & bus movement)
- Primary movement route (inc. cycle & pedestrian movement)
- Secondary movement route
- Tertiary link road movement
- Private lane movement
- Footpaths**
- Public rights of way
- Potential pedestrian & cycle routes within development
- Potential pedestrian routes within development



Movement Strategy
 • Not to scale

MOVEMENT FRAMEWORK PLAN

- 6.13 Land at Cross Green has the opportunity to deliver substantial new sustainable transport infrastructure to serve new residents as well as existing residents in South Staffordshire and the Black Country.
- 6.14 The site will demonstrate a clear and defensible road hierarchy establishing a strong movement infrastructure throughout the development.
- 6.15 The movement hierarchy demonstrated defines the main routes which helps to achieve a permeable layout for all users. The hierarchy comprises a series of interconnected primary, secondary and tertiary routes in recognition of the need to combine the function of the street as a movement corridor alongside place making function. The importance of each of the street types in terms of its movement and place function varies within the hierarchy. Streets are therefore defined by building layout, landscape proposals and character, so that buildings rather than roads or cars dominate.

Pedestrian and cycle routes

- 6.16 The location of the site close to the existing established residential communities, local facilities and public transport connections are positive characteristics on which the provision of a new network of pedestrian and cycle routes are hinged.
- 6.17 Provision of a pedestrian and cycle network within the site is seen as an integral part of the transport infrastructure for the development, allowing users of all ages and abilities to move safely and conveniently between areas of the development and surrounding facilities.

Potential bus routes

- 6.18 The movement infrastructure will be designed to accommodate public transport routes. The development has potential to accommodate bus movement running in a north-south orientation connecting in with the new district road and the existing A449 (Stafford Road).
- 6.19 The integration of a bus service will assist site sustainability and allow residents to access nearby urban centres, facilities and the wider national transport system.



Green & Blue Infrastructure Strategy
Not to scale

GREEN AND BLUE INFRASTRUCTURE

Hierarchy of spaces

6.20 Landscape design and green infrastructure is a key component for creating a memorable, recognisable and enjoyable development. Green spaces are an integral part of the placemaking strategy and create a strong landscape structure across the development.













6.21 A series of community, play and natural spaces will offer users the opportunities for social inclusion, active pursuits and play. The development therefore comprises:

- Interlinked public open spaces with greenways linking all spaces with natural movement routes.
- Enhanced existing public access through creation of a fully accessible and secure network of green infrastructure incorporating public open spaces for informal play/ recreation.
- Greenways will look to retain all existing vegetation on site with additional structural planting boosting the tree/ hedgerow cover across the development.
- A Central Common will locate a series of play spaces

for all ages and abilities serving new and existing residents.

- A range of equipped areas of play will feature throughout the development to serve all areas of development so all residents fall within maximum travel distances set by policy.
- A series of new community spaces in the form of Trim trails, community allotments and community orchards.
- New community sports pitches could provide a space for all ages to be active and opportunities for social inclusion and community pursuits.
- All site low points will be utilised for sustainable drainage solutions.
- Retention of existing trees and hedgerows within public open spaces to safeguard potential wildlife and existing biodiversity.
- New ornamental and native planting will provide increased habitat opportunities and foraging routes for wildlife.

LEGEND

-  Site boundary
- PLACEMAKING**
-  Key gateways
-  Key nodal points
-  Key / important frontages
-  Sensitive development frontage
-  Community hub
-  Proposed school site
-  Landmark buildings
-  Noise-sensitive development edges
-  Key views from surrounding public realms
-  Public open space
-  Pitches
-  Orchard
-  Allotments
-  Community trim trail
-  Structural planting providing a reduction in acoustic disturbance
-  Neighbourhood Equipped Area of Play
-  Locally Equipped Areas of Play
-  Area of Natural Play



URBAN DESIGN FRAMEWORK

6.22 The overarching principles of development will seek to respond to the site's constraints and opportunities to meet best standards of Urban Design practice.

6.23 Key principles that the development will seek to respond to are:

- Creation of key gateways at each access into the site aiming to create a memorable and positive development upon arrival into the development.
- Creation of a series of key nodal points along primary routes providing wayfinding opportunities for users.
- Key frontages along interfaces with existing movement routes will seek to respond appropriately to its setting.
- Creation of a multi-functional community hub serving new residents with retail, educational and public facilities.
- Creation of a road hierarchy that assist in wayfinding throughout development with a gradual reduction in hierarchy as development moves out to rural/ sensitive edges.
- The creation of a strong, inter-connected landscape and open space structure, comprising public open space, ecology areas, community use spaces and equipped areas of play.
- Creation of a fully connected movement infrastructure that promotes green forms of movement and demonstrates a non-car dominated development.
- Maximum outward facing development promoting passive surveillance over newly created open space and reducing anti-social behaviour.
- Sensitive edges along the Staffordshire and Worcestershire canal are designed appropriately to provide a high-quality interface.
- Development edges will be designed appropriately to reduce any detrimental effects to development from nearby rail and vehicular movement routes.



CONCLUSION

7.1 The land at Cross Green Lane is truly deliverable and should be allocated as an infrastructure led strategic development location through South Staffordshire’s Local Plan Review process. The site provides the opportunity to realise a sustainable, quality urban extension on the northern edge of Wolverhampton which could accommodate c. 1,200 new homes as well as significant amounts of public open space and supporting infrastructure.

AVAILABLE NOW

7.2 The majority of the land identified on the Site Location plan (Page 6) is owned by Taylor Wimpey, a national housebuilder who are committed to delivering a sustainable residential community on the site at the earliest opportunity following an appropriate allocation as part of the South Staffordshire Local Plan Review.

7.3 There are no legal or ownership impediments which would prevent the land from being delivered for residential use.

SUITABLE LOCATION

7.4 The site comprises Green Belt land to the north of Wolverhampton which, as demonstrated in Section 4, it is a suitable site for release to meet housing needs of South Staffordshire District and the wider Greater Birmingham Housing Market Area. The location to the ‘North of Wolverhampton/i54’ was an employment-led housing growth option identified within the Greater Birmingham Strategic Growth Study that performed strongly against a range of criteria. The site is considered to be a sustainable location for employment led residential development.

ACHIEVABLE

7.5 The site comprises greenfield land and will not be subject to any known major remediation or preparation costs. Taylor Wimpey has reviewed the economic viability of the site and proposals in terms of land values, market attractiveness/demand, sales rates and development costs and can confirm that the development is economically viable. Taylor Wimpey also has the capacity to deliver the proposed development.

7.6 In terms of a delivery programme, if the site were allocated in the Local Plan Review then the first completions could potentially occur as early as 2025, whilst the whole development would be completed by the end of the proposed plan period in 2039.

7.7 In summary, the site will deliver a significant number of much-needed housing in the medium to long-term in a sustainable location and would facilitate the delivery of a new parkway station. A leading housebuilder has indicated that that the proposed development is viable and they are able to deliver the development in a timely manner. Therefore, the site is achievable.

7.8 Taylor Wimpey is committed to working with South Staffordshire District Council, other key stakeholders and the local community to design a quality residential development which respects and enhances the village. Taylor Wimpey will use this document to facilitate further consultation with the relevant authorities and the local community to refine the proposals in light of further input appropriate representations to the Local Plan Review.



APPENDIX 1

Taylor Wimpey UK Limited

Taylor Wimpey UK Limited is a dedicated homebuilding company with over 126 years' experience; we have an unparalleled record in our industry. We aim to be the homebuilder of choice for our customers, our employees, our shareholders and for the communities in which we operate.

We have expertise in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure which improves our customers' quality of life and adds value to their homes. We draw on our experience as a provider of quality homes but update that, to the expectations of today's buyers and strive to provide the best quality homes, while setting new standards of customer care in the industry. Our 23 regional businesses in the UK give our operations significant scale and truly national geographic coverage.

Each business builds a range of products, from one bedroom apartments and starter homes to large detached family homes for every taste and budget and as a result, our property portfolio displays a surprising diversity. The core business of the company is the development for homes on the open market, although we are strongly committed to the provision of low cost social housing through predominantly partnerships with Local Authorities, Registered Social Landlords as well as a variety of Government bodies such as Homes England and Communities Agency.

With unrivalled experience of building homes and communities Taylor Wimpey today continues to be a dedicated house building company and is at the forefront of the industry in build quality, design, health and safety, customer service and satisfaction. Taylor Wimpey is committed to creating and delivering value for our customers and shareholders alike. Taylor Wimpey combines the strengths of a national developer with the focus of small local business units. This creates a unique framework of local and national knowledge, supported by the financial strength and highest standards of corporate governance of a major plc. Taylor Wimpey Strategic Land, a division of the UK business, is responsible for the promotion of future development opportunities, such as this site, through the planning system. The local business unit that will, in conjunction with Strategic Land, carry out housing and related development as part of this is Taylor Wimpey North Midlands, based in Wolverhampton.



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DESIGN



ENVIRONMENT



PLANNING



ECONOMICS



HERITAGE

APPENDIX 4

Green Belt Position Note

Land at Cross Green, South Staffordshire Green Belt Position Paper edp5393_r005c

1. Introduction, Purpose and Approach

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been appointed by Taylor Wimpey UK Ltd (the 'Promotor') to prepare a Green Belt Position Paper to inform the proposed allocation of land east of the Stafford Road (A449) near Wolverhampton, Staffordshire ('the site').
- 1.2 South Staffordshire District Council (SSDC) acts as the statutory planning authority and the site is located entirely within the West Midlands Green Belt. The site is being promoted as part of the District's Local Plan Review, with the Preferred Options consultation identifying the site as a preferred strategic housing allocation to deliver a minimum of 1,200 homes and a new community on a key transport corridor.
- 1.3 This Green Belt Position Paper should be read alongside the Landscape Position Note (reference **edp5393_r004**), which sets out the prevailing landscape and visual circumstances of the site and its surroundings.
- 1.4 EDP is an independent environmental consultancy providing advice to landowners and property development clients in both public and private sectors, in the fields of landscape, ecology, heritage, arboriculture and masterplanning. The practice operates throughout the UK from offices in Cirencester, Cardiff and Cheltenham. Details can be obtained at our website (www.edp-uk.co.uk).

Site Location and Description

- 1.5 The site is situated within the administrative authority of SSDC and measures approximately 54 hectares (ha). It is located at Ordnance Survey Grid Reference (OSGR) SJ 918 052 (site centre).
- 1.6 The site is located approximately 1.25km west of the village of Featherstone and approximately 6km north of Wolverhampton City Centre. There are wayside dwellings situated along the Stafford Road (A449) and the nucleated dwellings and farmstead around the site form the most immediate residential setting for the site.

Purpose

- 1.7 The purpose of this Position Paper is to examine the potential impacts of future development on the Green Belt (in landscape terms only), taking into account the current use of the site, its landscape character and the visual context of the site.



- 1.8 The findings of this process as well as other technical studies, including landscape and visual, have been developed by EDP to inform the emerging development proposals for the site at this preliminary stage.

Approach

- 1.9 There is no formal published methodology for assessing impacts on openness of Green Belts. Therefore, the approach adopted is based on the experience of a Chartered Landscape Architect and uses relevant case law in support. Several assumptions are made in respect of some elements of the development proposals which have been informed by a Development Framework Plan.

2. Planning Context and Relevant Considerations

- 2.1 The proposal for a West Midlands Metropolitan Green Belt was put forward in 1955 and was formally approved in 1975. The Green Belt surrounds the urban areas of Birmingham, Solihull, Coventry and the Black Country. The West Midlands Green Belt was established to stop major urban areas from merging together, as well as preventing the merging of smaller towns and cities on the periphery of the Green Belt. 'Washed over' by the Green Belt, south of the conurbation, there are a number of towns including Bromsgrove, Redditch and Kidderminster.
- 2.2 The quantum of Green Belt within the West Midlands, and within the County of Worcestershire, relied upon boundaries which were originally proposed in the County Development Plan for Worcestershire (1957) and confirmed generally in the County Structure Plans since 1975.
- 2.3 As set out in the *National Planning Policy Framework* (NPPF), 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. As such, Green Belt is a planning policy designation rather than a landscape designation based on landscape character and value.
- 2.4 Notwithstanding the general stance on the protection of the Green Belt, the NPPF is also clear that Green Belt boundaries can be altered, but only in exceptional circumstances and that this process can only be undertaken through the preparation or review of the Local Plan.
- 2.5 NPPF paragraph 138 continues, and sets out five purposes of the Green Belt, which are listed below:
- a) *"To check the unrestricted sprawl of large built-up areas;*
 - b) *To prevent neighbouring towns merging into one another;*



- c) *To assist in safeguarding the countryside from encroachment;*
- d) *To preserve the setting and special character of historic towns; and*
- e) *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

2.6 Guidance in paragraph 142 makes clear that, when reviewing Green Belt boundaries, Local Planning Authorities (LPAs) should take account of the need to promote sustainable patterns of development and consider the consequences for sustainable development, of channelling development towards urban areas and towns and villages, inset within the Green Belt, or towards locations outside the Green Belt boundary.

2.7 The NPPF sets out guidelines for local planning authorities in relation to Green Belts, including the desire to plan positively to enhance the beneficial use of the Green Belt, looking for opportunities to provide access, outdoor sport and recreation and to retain and enhance landscapes, visual amenity and biodiversity or to improve damaged and derelict land (paragraph 145).

2.8 Also of relevance to this report is guidance in paragraph 143 with regard to defining boundaries, which states that local authorities should, *inter alia*:

- Not include land that it is unnecessary to keep permanently open; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

The History of Green Belt within SSDC

2.9 South Staffordshire District is located to the south of Stafford, within the West Midlands Green Belt. The district abuts a number of the Black Country administrative areas to its east, including the City of Wolverhampton.

2.10 Local authorities in the West Midlands first put forward proposals for a West Midlands Metropolitan Green Belt in 1955. The Green Belt was not formally approved by the Secretary of State until 1975. Today the Green Belt covers over 900 square miles, surrounding the Black Country, Coventry, Birmingham and Solihull.

2.11 The Green Belt has remained relatively successful in checking the sprawl of Birmingham, Wolverhampton and Coventry, preventing the merging of settlements and encroachment into the surrounding countryside, helping to preserve the setting and special character of the constellation of satellite settlements that inhabit it.

- 2.12 With around 80% of the district designated as Green Belt, South Staffordshire has been relatively successful at preventing the outward spread of the larger urban conurbations. The district's larger settlements, such as Codsall and Wombourne, as well as the smaller villages that pre-date the Green Belt, such as Pattingham, Featherstone and Coven, are generally compact and separate, which is a testament to the success of the Green Belt in the district.
- 2.13 In summary, there are 32,320ha within the administrative area of SSDC, which equates to approximately 80% of the overall area of the district and circa 2% of the overall Green Belt across the whole of England.

SSDC South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019)

- 2.14 In July 2019, and as part of their Local Plan Review, SSDC published their South Staffordshire Green Belt Study (Stage 1 and 2 Report). This document provides their preferred methodology for undertaking such a review and facilitates the Green Belt Study.
- 2.15 This study was undertaken by LUC on behalf of the LPA. Stage 1 considers the contribution made by the land parcel to the five Green Belt purposes, "*identifying areas of land whose performance ranges from relatively weak to relatively strong in Green Belt terms.*"
- 2.16 This Green Belt Study has two stages:
- Stage 1 draws out strategic variation in the 'contribution' of Green Belt land to the Green Belt purposes as defined in the NPPF; and
 - Stage 2 includes a more focused assessment of the potential 'harm' of removing land from the Green Belt.'

Stage 1 Critique

- 2.17 With regard to SSDC's Stage 1 appraisal, EDP provides the following critique. Both stages of the study were undertaken by strategically splitting the District's Green Belt into 82 land parcels. The extent of each land parcel was defined using Ordnance Survey maps and aerial photography, and uses clear physical features such as motorways, A roads, B roads, some minor roads, railways and canals.
- 2.18 In line with NPPF paragraph 143, which states: "*When defining Green Belt boundaries, plans should...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent*", SSDC assert that they have defined land parcels through a selection process based on such physical features.
- 2.19 **Image EDP 2.1** below is an extract of SSDC's South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019). SSDC have assessed the site as part of two significant tracts of land north of Wolverhampton. The first is referred to as Land Parcel S20 - between

Wolverhampton, Walsall and Cheslyn Hay, which the southern half of the site is situated within. Land Parcel S44 is West of Featherstone prison (north).

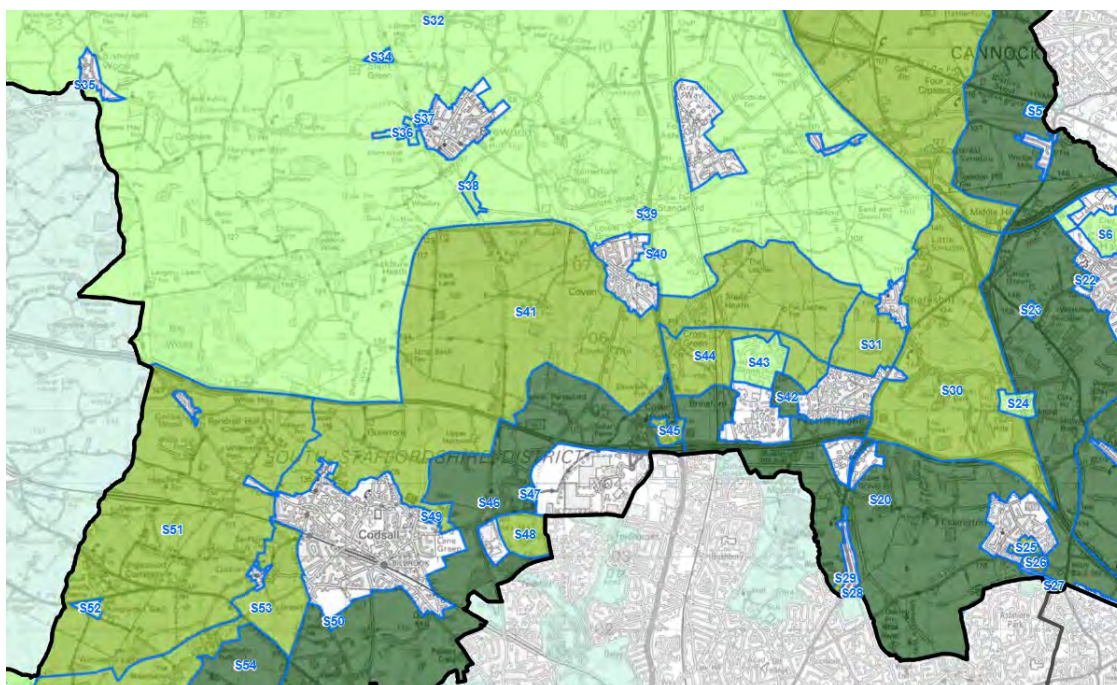


Image EDP 2.1: Extract from SSDC South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019). Land Parcels S20 and S44 are shown on this extract, for which the site is a percentage of its quantum.

2.20 SSDC confirms that the overall quantum of these two land parcels is 1,221.2ha and 85.3ha respectively. This totals over 1,300 hectares of land which SSDC has appraised for the Stage 1 review. This is a very extensive area to reach a consistent appraisal summary for.

2.21 Nonetheless, with consideration of SSDC’s assessment of Green Belt function for Land Parcels S20 and S44, the following is noted in **Table EDP 2.1:**

Table EDP 2.1: Scoring for S20 and S44 against the Green Belt Purposes (i-v) as Appraised by SSDC’s South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019), Stage 1.

Purpose	Stage 1: Overall Land Parcel S20 (1221.2ha)	Stage 1: Overall Land Parcel S44 (85.3ha)
Purpose 1: To check the unrestricted sprawl of large built-up areas	Strong	Moderate
Purpose 2: Prevent neighbouring towns from merging	Moderate	Moderate
Purpose 3: Assist in safeguarding the countryside	Strong	Strong

Purpose	Stage 1: Overall Land Parcel S20 (1221.2ha)	Stage 1: Overall Land Parcel S44 (85.3ha)
Purpose 4: Preserve the setting and special character of historic towns	<i>Weak/No Contribution</i>	<i>Weak/No Contribution</i>
Purpose 5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	<i>Strong</i>	<i>Strong</i>

- 2.22 With consideration of the local area and a number of field-based visits during 2019 and 2021, EDP considers that these land parcels are not defined relative to clear physical features such as Motorways (M54), A roads (A449 Stafford Road), B roads, some minor roads, railways (West Coast railway line connection to a regional City) or canals (Staffordshire and Worcestershire canal). All of these features occur within the site and the local area and create distinct barriers to land tracts.
- 2.23 EDP notes that such physical features are used in the definition of Land Parcel S44; for instance, the Stafford Road dual carriageway (A449), yet the land parcel extends beyond the West Coast Mainline railway connection to Featherstone prison, stretching to the east in a linear corridor to the settlement edge of Featherstone.
- 2.24 Additionally, EDP also notes that Land Parcel S20 is much greater in quantum than S44 and similarly utilises the Stafford Road (A449 dual carriageway) as the western edge of the land parcel. However, the land parcel extends beyond the West Coast Mainline railway connection and also beyond the M54 Motorway south of this arterial route, to wrap around the northern suburban areas of Wolverhampton. Instead, the minor ‘washed over’ settlement of Essington and the less extensive A roads are utilised to define the land parcel.
- 2.25 EDP considers the definition of these land parcels to be at odds with the definition of Green Belt boundaries defined in NPPF paragraph 143. Whilst SSDC use primary hierarchical features that are robust, durable and long established in some areas, they use less significant boundaries in other locations, especially around existing settlements.
- 2.26 Given the foregoing, EDP would advocate an individual site-based assessment for contribution to Green Belt role; see **Section 4** of this Position Paper.

Stage 2 Critique

- 2.27 With regard to SSDC’s Stage 2 appraisal, EDP provides the following critique. Land Parcel S44 includes the northern section of the site area; see **Image EDP 2.2** below.



Image EDP 2.2: Extract from SSDC South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019). Land Parcel S44 is shown on this extract, for which the site is a percentage of its quantum.

2.28 SSDC broke down land parcels from Stage 1 into a number of sub-parcels. The definition of these sub-parcels is varied and uses a 'set' of 'absolute' environmental constraints – i.e. areas within which the Council would currently not permit development. These were identified as:

- *“Cultural Heritage: Scheduled Monuments (SMs), Registered Parks and Gardens;*
- *Natural Heritage: Special Areas of Conservation (SACs), Sites of Special Scientific Interest, National Nature Reserve, Local Nature Reserves, Sites of Importance for Nature Conservation (SINC)/Sites of Biological Importance (SBI), Ancient Woodland; and*
- *Other constraints: Common Land, Flood Zone 3 Areas, Burial Ground.”*

2.29 SSDC acknowledges that 'in some cases, the commentaries on individual parcels have offered comments as to whether features on the ground might provide possible

boundaries'. Given the quantum of land appraised in Stage 1 by SSDC, this approach seems at odds with the guidance provided by the NPPF for Green Belt release.

2.30 It is noted that this lack of appreciating durable, physical boundaries that have been long established in defining a land parcel sub-parcel, seems at odds with the recommendations of NPPF paragraph 143, which states “When defining Green Belt boundaries plans should.....define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

2.31 With consideration of the site, it falls within sub-parcels S44A and S20D as shown on **Image EDP 2.3** below.

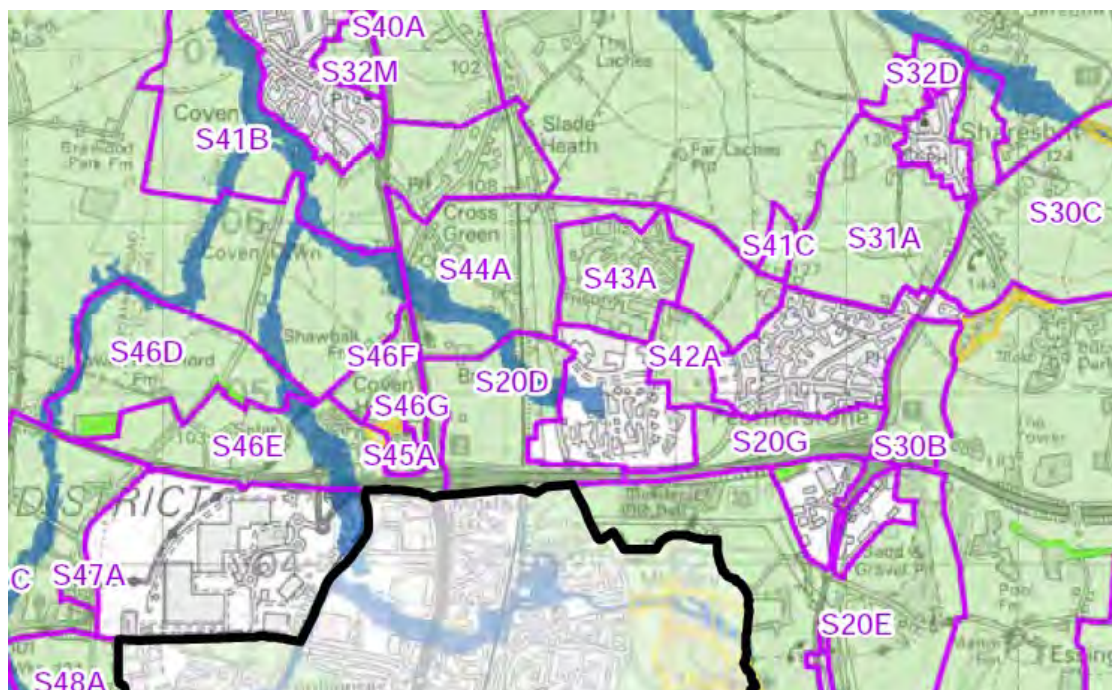


Image EDP 2.3: Extract from SSDC's South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019). Land Parcels S20D and S44A are shown on this extract.

2.32 These parcels are seemingly again split down into Parcels S44As1 and S44As2 and S20Ds1, and are overlaid with promoted sites which includes the site as 646a and 646b; see **Image EDP 2.4**.

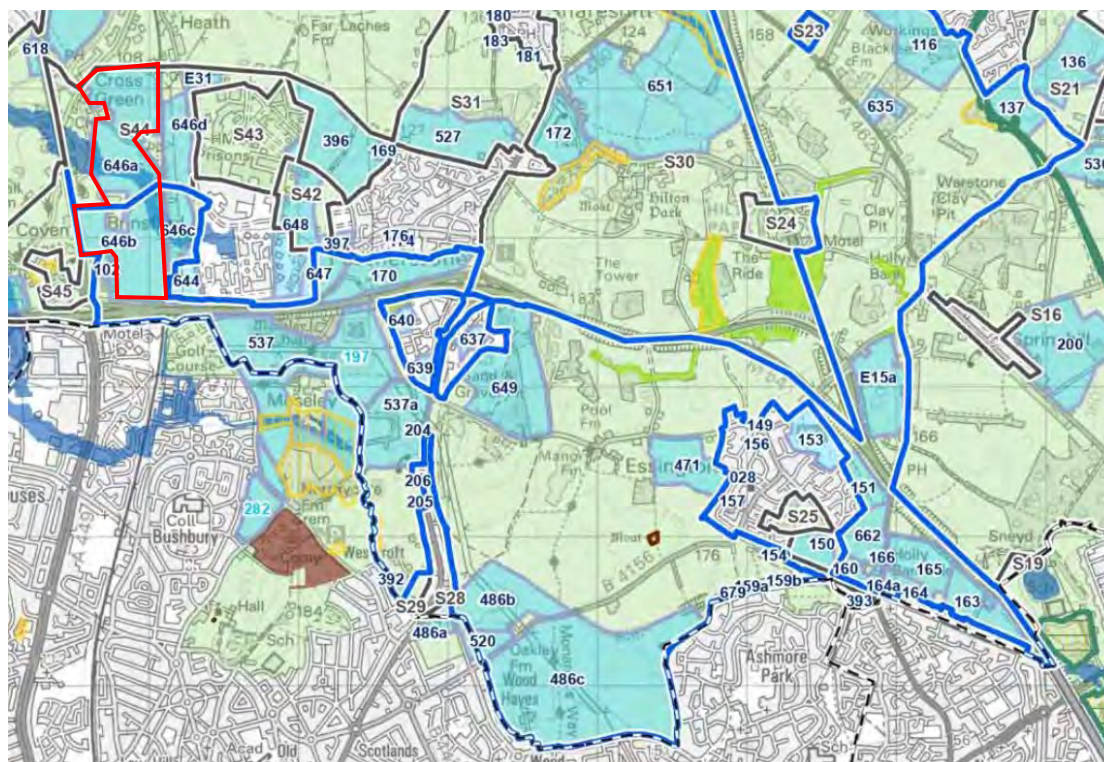


Image EDP 2.4: Extract from SSDC's South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019). The approximate site boundary is overlaid.

2.33 Given EDP's field-based assessments in 2019 and 2021, EDP notes the following:

- Sub-parcel 646a (and the wider land parcel) is defined along its western edge by the Stafford Road (A449) dual-carrageway and the local minor vehicle route (New Road) to the north of the parcel;
- In combination, the land parcels do not extend across the West Coast Mainline railway which provides a robust, long-established defensible boundary to Sub-parcels 646a and 646b; and
- The fact that Sub-parcels 646a and 646b do not extend beyond the mainline is consistent with a clear definition of Green Belt boundaries for the following reasons:
 - The landscape character beyond the Mainline is more open and exposed in its visual and sensory perception;
 - The physical presence of the West Coast Mainline, and its associated earthworks, divorces Sub-parcel 646a from 646b;
 - The landscape character is degraded and has a larger field pattern;
 - Sub-parcel 646b is situated on higher landform; and



- Sub-parcel 646b is overlooked substantially by the Featherstone prison, and there is a prominent sense of development within this sub-parcel.
 - Additionally, S44 includes Sub-parcel E31, which is detached and remote to Sub-parcel 646a and enclosed by existing development, and is prominent in visual and sensory terms. For instance, Featherstone prison and an industrial/commercial activity with large-scale built form.
- 2.34 EDP consider that the West Coast Mainline railway provides a distinct barrier between Sub-parcel 646d and the wider parcel to which it currently belongs (i.e., S44), and that this unique relationship will significantly affect its ability to perform as effective Green Belt land. Further to this, the prominent sense of development east of the railway line is obviously lacking from within Sub-parcel 646a and the wider site area.
- 2.35 Given the foregoing, EDP advocates a site-specific assessment of Sub-parcel 646a, as the current inclusion of Sub-parcel 646d and E31 provides an inaccurate Green Belt rating for Parcel S44 which is not representative of its real contribution.
- 2.36 With consideration of Land Parcel S20, this parcel includes a significant number of sub-parcels across an expansive area of over 1,200ha, see **Image EDP 2.3**. Given EDP's field-based assessment, the following is noted:
- S20 represents a substantial land parcel, which has been determined by SSDC to be north and south of the M54 Motorway (with its associated earthworks and extensive landscape mitigation planting);
 - There is a more obvious influence of development east of the West Coast Mainline railway, than west of the railway link;
 - There is a far more substantial perception of urban development south of the M54 Motorway along the sub-urban areas of Wolverhampton, than north of the motorway; and
 - Landscape character is more intact around the western edge of the land parcel, with a greater perception of physical and landscape features creating durable elements, than the eastern and south-eastern areas of the land parcels. Here, landscape character has become degraded and influenced by the urban edge setting.
- 2.37 Overall, EDP propose the Green Belt Study 2019 adopts a similar approach to that of the Landscape Sensitivity Assessment 2019. Within this recent study, the site is recognised as Land Parcels SL47 and SL48; however, SSDC split S47 into two parcels, which are separated by the West Coast Mainline railway connection. SL47 is west of the railway line and S47s2 east of the route. The Landscape Sensitivity Assessment rates SL47 as having a “*moderate overall sensitivity to development*” and rates SL47s2 as having a “*low-moderate overall sensitivity to development*”.

- 2.38 This division of Land Parcel SL47 into two sections highlights that the railway is already recognised as a barrier which fundamentally influences the landscape sensitivity rating of the sub-parcels within. Given that this Landscape Assessment has yielded different sensitivity ratings for land either side of the railway, we propose that different contribution ratings would be achieved if the Green Belt Study assessed the same parcel in a similar way. Furthermore, it suggests that any assessment that does not regard land east of the railway as a separate parcel will lack specificity and will therefore be unreliable.
- 2.39 Given the foregoing, a site-specific assessment is recommended.

3. Published Landscape Character Assessments

- 3.1 A review of the relevant published Landscape Character Assessment enables judgements to be made on the performance of land against Green Belt Purpose 3. This is done by examining the Council's adopted baseline understanding of landscape character and comparing it against the current character of the site.
- 3.2 EDP undertook site visits by a Chartered Landscape Architects in 2019 and 2021 during which the current character of the site and locality were recorded, see EDP's Landscape Position Note (reference: **edp5393_r004**). This Position Paper does not comprise a Landscape and Visual Impact Assessment, as at this stage there is no refined development proposal to assess.

Staffordshire Landscape Character Assessment

- 3.3 The County-wide Landscape Character Assessment identifies the site as falling within the "Settled Plateau Farmland Slopes" Landscape Character Type. Given EDP's field-based assessment, the following landscape characteristics are noted as being common to the site:
- *"Gently rolling landform with ore pronounced slopes and undulations in places allowing medium to long distance views across to urban edges of surrounding landscapes;*
 - *The proximity of the urban edge strongly influences the general character of the landscape...busy, noisy areas dissected by major transportation corridors...; and*
 - *The encroachment of housing and industry urbanises the general character with the deterioration of landscape quality most noticeable at the immediate urban fringe".*
- 3.4 Reflecting on EDP's field-based assessment, the following is noted with regard to the open countryside surrounding the site area:



- *“Where nearby urban influences impact strongly on the landscape the landcover elements are in decline, with lanes now heavily used as through routes, and large scattered farms now diversifying; and*
- *The landscape there becomes one of an undistinguished character where no one element visually dominates but with an urban fringe feel due to adjacent industrial areas and to the introduction of non-traditional activities”.*

3.5 It is clear that the site is influenced by the extensive transportation corridors, including the West Coast Mainline, the M54 Motorway and the Stafford Road (A449) dual-carriageway, and the route of the canal.

3.6 Furthermore, the development of the former Royal Ordnance Factory (ROF) Featherstone strategic employment site to the east, and the construction of the consented Road Option 7 that forms an elevated crossing over the West Coast Mainline, and crosses the site to connect with the A449, will further influence the site.

3.7 The result of these facets of the local landscape is that the site has a functional relationship with these urbanising influences rather than the wider open countryside, which it feels almost divorced from due to the physical presence of roadways, railway line and substantial built form (HMP Featherstone and Wolverhampton City) forming the site boundary, or its immediate context.

4. EDP’s Green Belt Appraisal

4.1 As per **Section 2** of this Position Paper, SSDC’s South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019) contains a detailed methodology. SSDC used this methodology to assess the land parcel’s contribution to Green Belt role, as well as the level of harm for each sub-parcel, and in turn each site (known through promotion) for the likely harm from their removal for development.

4.2 This same methodology has been followed to provide a site-specific appraisal of the site. EDP’s appraisal of the site follows:

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

4.3 Whilst the site is situated on the edge of a large built-up area (Wolverhampton and its suburban areas), it is located within small hamlets and village areas (Coven Heath and Cross Green).

4.4 EDP recognises that the site is influenced by existing urban built form and features, not typical of the open countryside, or the ‘*Settled Plateau Farmland Slopes*’ Landscape Character Type. For instance, the presence of the M54 Motorway and West Coast Mainline railway line.



- 4.5 Consequently, the site has a less obvious relationship with the wider open countryside than the wider land parcel may do, especially to the east of the West Coast Mainline. Whilst the extensive hedgerow and mature landscape features, and mitigation planting associated with transportation corridors, encloses the site area and limits the openness with the wider open countryside, it is contained in part by a built-up area or small elements of development.
- 4.6 The bringing forward of development at the site, and re-alignment of the Green Belt, would modify the settlement edge of Wolverhampton. However, given the foregoing, this modification would not be unchecked and will not realise unrestricted sprawl. EDP concludes, that the site makes only a Moderate contribution to Green Belt Purpose 1.

Purpose 2: To Prevent Neighboring Towns from Merging

- 4.7 The site is only a minor component of the overall land parcel which has been appraised. The site is situated with a number of outlying towns within a relative distance. For instance, Penkridge and Stafford are approximately 7km and 13km north of the site. Cheslyn Hay and Cannock are approximately 6km and 8km to the north-east of the site. There are a number of small outlying small villages and hamlets within the intervening distance.
- 4.8 In this light, the site represents only a very minor component of the overall gap between these settlements. Furthermore, there is no intersibility between the site and these outlying settlements due to the combination of distance, landform, mature landscape features and physical presence of transportation corridors.
- 4.9 With consideration of the foregoing, EDP concludes, that the site makes No Contribution to prevent the merging of neighbouring towns (Green Belt Purpose 2).

Purpose 3: Assist in Safeguarding the Countryside from Encroachment

- 4.10 EDP undertook its own field-based assessment during April 2019 which, combined with information published within Staffordshire County Council's 'Planning for Landscape Change Supplementary Planning Guidance' Landscape Character Assessment, enables a much closer understanding of the site. Our field-based appraisal is helpful to reach conclusions about the acceptability, in landscape terms, of developing the site and its possible effects on local character.
- 4.11 The presence of settlements within the "Settled Plateau Farmland Slopes" Landscape Character Type is typical and the Staffordshire County Council's 'Planning for Landscape Change Supplementary Planning Guidance' recognises settlements as a typical influence in the landscape following 20th century urban expansion and infrastructure: "The proximity of urban edge strongly influences the general character of the landscape....busy, noisy areas, dissected by major transport corridors, railways, quarries and power lines..."



4.12 Further to this, the following incongruous features are noted within the site and within its immediate setting:

- The site has limited features of value with its hedgerows, hedgerow trees and topography probably being its most interesting aspect. However, existing boundary and internal vegetation is commonly poorly managed;
- There are a number of landscape detractors discernible from within the site, which are predominantly associated with the position of the site on the edge of Wolverhampton and the adjoining M54 Motorway to the southern boundary. The West Coast Mainline runs along the eastern boundary and the A449 roadway encloses the western site edge. In combination, these physical features and transient movement disrupt the tranquillity of the local area;
- The sense of existing development is common through the site, especially to the southern areas where there is a perception of existing residential development overlooking the site from the western edge;
- Where nearby urban influences impact strongly on the landscape the landcover elements are in decline, with lanes now heavily used as through routes and large scattered farms now diversifying;
- The landscape there becomes one of an undistinguished character, where no one element visually dominates but with an urban fringe feel due to adjacent industrial areas and the introduction of non-traditional activities; and
- It is clear that the site is influenced by the extensive transportation corridors, including the West Coast Mainline, the M54 Motorway and the Stafford Road (A449) dual-carriageway, as well as by the nearby HMP Featherstone, ROF strategic employment site and the new Road Option 7. These features provide significant and prominent physical elements which sandwich and enclose the site.

4.13 Consequently, EDP considers that the site makes only a limited contribution to the key characteristics of the landscape of the “*Settled Plateau Farmland Slopes*” Landscape Character Type. Additionally, there are a number of landscape detractors discernible from the site. These detractors are predominantly associated with the position of the site on the edge of Wolverhampton and the influence of urban development.

4.14 The site is sandwiched between significant transportation corridors and their associated curtilages. In the main, the site is experienced as being on the edge of an existing settlement, rather than being divorced from it, in the open countryside. In summary, EDP considers that the site only makes a Moderate contribution to this Green Belt Purpose.



Purpose 4: Preserve the Setting and Special Character of Historic Towns

- 4.15 With consideration of the site's contribution to the function of this Green Belt Purpose, EDP notes that there are many conservation areas within the South Staffordshire Green Belt and also in neighbouring districts adjacent to the site (within the City of Wolverhampton). However, these areas are not classed as 'historic towns'.
- 4.16 The only area within this criterion would relate to settlements situated a lengthy distance away and given the intervening landform and mature landscape features, there is no indivisibility with the site. For instance, Stafford, Walsall, Wombourne, the historic core of Wolverhampton, or Bridgnorth in Shropshire.
- 4.17 Therefore, it is considered that in reality this purpose would have very little relevance when assessing the site. Hence, EDP considers that the site makes No Contribution to this Green Belt Purpose.

Purpose 5: Assist Urban Regeneration, by Encouraging Recycling of Derelict and Other Urban Land

- 4.18 With regard to Purpose 5, "to assist in urban regeneration by encouraging the recycling of derelict and other urban land", EDP considers that every land parcel would perform the same when measured against it.
- 4.19 Additionally, it is noted that there has been much consideration across the country as to whether there is value in performing an assessment against this purpose. Planning and Application Advisory Service (PAS) Guidance 1 suggests that if the process has been properly followed, the ability to accommodate development within the urban area will have been fully explored prior to considering land within the Green Belt.
- 4.20 In the case of the West Midlands Green Belt, although the Green Belt was established to stop major urban areas and also smaller towns and cities from merging together, it has clearly played a key role in assisting the urban regeneration of the Birmingham conurbation and the reuse of brownfield land elsewhere outside of the Green Belt. Consequently, every land parcel would perform the same when measured against it, therefore adding no value to the overall assessment.
- 4.21 Given the foregoing, EDP considers that the site makes a Strong Contribution with regard to Green Belt Purpose 5.

Comparative Summary (Part 1)

- 4.22 Comparison of the site against S44 and S20 is summarised in **Table EDP 4.1**, which demonstrates that the site would make a weak performance against the purposes of the NPPF.

Table EDP 4.1: Comparison Scoring for the Site against the Green Belt Purposes (i-v) as Appraised by SSDC's South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019).

The Site					
Appraiser:	Purpose 1: Checking the unrestricted sprawl of large built- up areas	Purpose 2: Prevent neighbouring towns from merging	Purpose 3: Assist in safeguarding the countryside from encroachment	Purpose 4: Preserve the setting and special character of historic towns	Purpose 5: Assist urban regeneration, by encouraging recycling of derelict and other urban land
SSDC (S44 Land Parcel)	Strong Contribution	Moderate Contribution	Strong Contribution	Weak/No Contribution	Strong Contribution
SSDC (S20 Land Parcel)	Strong Contribution	Moderate Contribution	Strong Contribution	Weak/No Contribution	Strong Contribution
EDP (the site)	Moderate Contribution	No Contribution	Moderate Contribution	No Contribution	Strong Contribution

4.23 In summary, given our site-specific appraisal, EDP is firmly of the opinion that the site is a lower functioning area of Green Belt than SSDC assessed for Land Parcels S44 and S20.

Harm to the Green Belt Through Site Removal (Part 2)

4.24 Harm is defined on page 62, paragraph 6.23 onwards of the SSDC South Staffordshire Green Belt Study – Stage 1 and Stage 2 Report, July 2019. The methodology arrives at an overall score rating by considering that the impact of releasing the site from the Green Belt will affect Green Belt boundaries and the strength/integrity of the adjacent Green Belt.

4.25 SSDC considers that the harm of releasing the sub-parcels within land parcel S44 and S20 ranges from High to Very High. With regard to the site, EDP notes the following relative to each Green Belt role.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

4.26 EDP is firmly of the opinion that the release of the site from the Green Belt is unlikely to significantly weaken the function or integrity of the wider Green Belt north of Wolverhampton. The site is well contained by mature, robust landscape features which limit intervisibility with the wider Green Belt outwards and is enclosed by substantive vehicle corridors including a Motorway, dual-carriageway and a branch of the West Coast Mainline railway link.

4.27 The eastern, southern and western edges of the site are more robust and defensible than the current make-up of the settlement edge surrounding Cross Green; however, this



settlement edge does not project into the open countryside and is contained by mature landscape features and minor local roadway and in part, the Staffordshire and Worcestershire Canal.

- 4.28 The development of the site through the enhancement of the existing landscape fabric within the site, and creating landscape and Green Infrastructure to the northern and western site boundaries, would enable a more succinct and contained settlement.

Purpose 2: To Prevent Neighboring Towns from Merging

- 4.29 As aforementioned, the site provides no contribution to this role. Should the release of the site be undertaken, development would modify the settlement edge of Wolverhampton. However, there would be perceptual reduction in the existing gap between the site and those outlying settlements and the towns of Stafford, Cannock and Cheslyn Hay.

Purpose 3: Assist in Safeguarding the Countryside from Encroachment

- 4.30 The main vehicle routes including the M54 Motorway, and the extensive development at Featherstone prison, represents a concentrated area of urban development forming the backdrop to the site. The site is not previously developed land and would be considered new building in the Green Belt. However, the site lies on land that is directly adjacent to multiple neighbouring residential built form and curtilages, as well as these substantial forms of development. Inversibility from the site across the wider open countryside is significantly limited by existing robust hedgerows, hedgerow trees and small stands of woodland within, and adjoining, the site.
- 4.31 However, EDP notes that it is clearly inferable from the likely future development that the site would be a mixture of residential built form and public open space. The creation of informal Public Open Space (POS) and semi-natural open space within the future scheme would maintain a sense of enclosure within the site, and would enhance existing robust boundaries, especially along its periphery.
- 4.32 EDP considers that given the foregoing, the development of the site would not diminish the openness of the countryside beyond the site's edge. These physical features would contain the urban influence from the modified settlement edge through an appropriately designed site layout.

Purpose 4: Preserve the Setting and Special Character of Historic Towns

- 4.33 As aforementioned, the site provides no contribution to this role. Therefore, should the site be released and developed in the future, there would be no physical or perceptual/sensory effect on the special character of historic towns.



Purpose 5: Assist Urban Regeneration, by Encouraging Recycling of Derelict and Other Urban Land

4.34 It is agreeable that the release of the site from the Green Belt could be harmful to Green Belt Role 5. However, based on EDP site visits during 2019, it is anticipated that there would be very few areas of derelict or existing developed land within the northern extent of Wolverhampton, that would be currently (or perceivably) available for redevelopment.

4.35 For this reason, the restriction of development from within the Green Belt, would not facilitate the development of derelict or other urban land within the immediate northern suburban areas of Wolverhampton, or the outlying smaller settlements north of the city in South Staffordshire.

4.36 In summary, given all the foregoing, EDP considers that the release of the site for future development would lead to a less substantial harm than appraised by SSDC. EDP is firmly of the opinion that the resultant harm would be Low-Moderate in nature. This level of harm is defined as:

“Where land makes a relatively strong contribution to one of the Green Belt purposes, but where its release would create a simplified, more consistent boundary and would not weaken the adjacent Green Belt, harm is likely to be low-moderate.”

4.37 In summary, given our site-specific appraisal, EDP is firmly of the opinion that the site is a lower functioning area of Green Belt than SSDC assessed for Land Parcels S20 and S44. EDP’s site-specific assessment (contained above) considers that the release of the site would lead to only a Moderate level of harm to the function of the Green Belt.

5. Boundary Resilience

5.1 With further consideration of ‘Chapter 13: Protecting Green Belt land’ of the Revised NPPF (July 2021), it is possible to review the site in a wider sense (relative to the Revised NPPF) to deliver a well-rounded and robust opinion of the site’s release from the Green Belt.

5.2 Paragraph 142 states the following:

“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of developments...They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”



5.3 Paragraph 143 states the following (pertinent to this Green Belt review):

“When defining Green Belt boundaries, plans should:

...

c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period...

...

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

- 5.4 With regard to the revised NPPF paragraph 143, it is recognised that there are benefits in *“using physical features that are readily recognisable and likely to be permanent”* for the re-alignment of Green Belt boundaries. Ideally, these features are clearly defined on the ground and perform a physical and/or visual role in separating town and countryside.
- 5.5 It is EDP’s firm opinion that robust, defensible boundaries are key to feasible Green Belt release, providing a fixed and permanent edge for re-aligning the Green Belt so that it is not altered in future years. In some cases, this purposeful act of realignment of Green Belt to these features can result in less incongruous development edges than can be seen currently in some parts of England.
- 5.6 Furthermore, such a consideration ensures that Local Authorities can identify the most essential Green Belt land area and prioritise land parcels which could be legitimately released from the Green Belt with the minimal amount of harm.
- 5.7 The site is inherently enclosed and limited by strong robust physical features, which are all long established and permanent. These include major vehicular routes such as the M54 Motorway, the Stafford Road (A449) dual-carriageway, and the West Coast Mainline railway link to the city centre.
- 5.8 The site, if developed as per the Development Framework Plan at **Appendix EDP 1**, is sandwiched between all of these robust physical features which represent potentially defensible, durable edges for Green Belt re-alignment, which would satisfy the requirements of the Revised NPPF paragraph 143: *“When defining Green Belt boundaries...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*
- 5.9 Consequently, EDP considers that the realignment of the Green Belt to reflect the quantum of the site would be sustainable and appropriate in longevity. This results primarily from the clearly demarcated boundary features, the enclosed nature of the site and the



consequential limitation in landscape and visual effects through the utility, and partial enhancement of permanent and physical features within the site.

- 5.10 In conclusion, the boundaries of the site are not only demarcated by visible features, but these features are robust and durable and have a high degree of permanence due to their status.

6. Conclusions

- 6.1 Through a preliminary site-specific assessment, this Position Paper has looked at key considerations for the removal of the site from the West Midlands Green Belt.
- 6.2 The development of the site will impact on the openness of the Green Belt at a Local level. However, due to the large scale of the designation, this would not significantly undermine the openness of the wider coverage of the West Midlands Green Belt.
- 6.3 As a result of this site-specific preliminary Green Belt review, it is possible to define how redevelopment could conserve and enhance the landscape, whilst utilising readily available defensible and durable boundaries around which to redefine the Green Belt. The site has the potential to provide permanent, defensible boundaries to maintain a sense of openness in the wider Green Belt area.
- 6.4 Overall, it is considered that the site *could* be released for development, without significant harm to the function of the Green Belt north of Wolverhampton, retaining the relative openness and performance of the wider Green Belt within this region of South Staffordshire.
- 6.5 For these reasons, it is considered that the site could reasonably be removed from the Green Belt and developed in accordance with an appropriately designed site proposal, which is sensitive and responsive to its environment, without overall harm to the integrity of the Green Belt.



Appendix EDP 1
Development Framework Plan (October 2021)



KEY

- SITE BOUNDARY (TBC)
63.76 HA
157.56 ACRES
- ↗ POTENTIAL SITE ACCESS
VIA BRINSFORD LANE, NEW ROAD AND
OLD STAFFORD ROAD
- PROPOSED HIGH DENSITY RESIDENTIAL
DEVELOPMENT PARCELS (50 DPH)
NDA 5.09 HA / 12.58 ACRES
UP TO 255 DWELLINGS (AT 50 DPH)
- PROPOSED MEDIUM DENSITY RESIDENTIAL
DEVELOPMENT PARCELS (40 DPH)
NDA 7.44 HA / 18.37 ACRES
UP TO 300 DWELLINGS (AT 40 DPH)
- PROPOSED LOW DENSITY RESIDENTIAL
DEVELOPMENT PARCELS (35 DPH)
NDA 18.1 HA / 44.72 ACRES
UP TO 435 DWELLINGS (AT 35 DPH)
- PROPOSED CENTRAL VILLAGE HUB
0.77 HA / 1.9 ACRES
- POTENTIAL LOCATION FOR PRIMARY SCHOOL
- 2.05 HA / 5.08 ACRES
- POTENTIAL PARKING FOR RAIL HALT
- 1.47 HA / 3.6 ACRES (UP TO 500 SPACES)
- POTENTIAL ROUNDABOUT ACCESS VIA
STAFFORD ROAD
- ↔ PROPOSED DISTRICT ROAD MOVEMENT
- ↔ PRIMARY MOVEMENT ROUTE
(INCORPORATING CYCLE AND PEDESTRIAN MOVEMENT)
- ↔ SECONDARY MOVEMENT ROUTE
- ↔ TERTIARY LINK ROAD MOVEMENT
- ↔ PRIVATE LANE MOVEMENT
- ↔ EXISTING RAIL MOVEMENT PROVIDING ACCESS TO
NEARBY URBAN CENTRES
- PROPOSED NEW RAIL HALT STOP
- ✳ POTENTIAL PEDESTRIAN CROSSING POINT (TBC)
- PUBLIC RIGHT OF WAYS
- POTENTIAL PEDESTRIAN ROUTES
WITHIN DEVELOPMENT
- EXISTING VEGETATION
- ★ PROPOSED STRUCTURAL PLANTING PROVIDING
A REDUCTION IN ACOUSTIC DISTURBANCE
- ★ PROPOSED WETLAND WOODLAND PLANTING
- ORNAMENTAL PLANTING
- COMMUNITY ORCHARD PLANTING
- ★ NEIGHBOURHOOD EQUIPPED AREA OF PLAY
- ★ LOCALLY EQUIPPED AREAS OF PLAY
- ★ AREA OF NATURAL PLAY
- ✳ COMMUNITY TRIM TRAIL ROUTE
- COMMUNITY ALLOTMENT SPACES
- CONFIRMED EXTENTS OF FLOOD LINE
- ★ SUSTAINABLE URBAN DRAINAGE (TBC)

KEY PRINCIPLES

1. POTENTIAL ACCESS VIA NEW ROUNDABOUT AND DISTRICT ROAD OFF EXISTING STAFFORD ROAD (A449);
2. POTENTIAL ACCESS VIA BRINSFORD LANE, NEW ROAD AND OLD STAFFORD ROAD;
3. PRIMARY RESIDENTIAL MOVEMENT PROVIDING GREEN FORMS OF MOVEMENT;
4. SECONDARY MOVEMENT ROUTES PROVIDING ACCESS TO LARGER PARCELS OF DEVELOPMENT;
5. TERTIARY MOVEMENT ROUTES PROVIDING ACCESS TO SMALLER CLUSTERS OF DEVELOPMENT
6. PRIVATE LANES WITH OUTWARD FACING DWELLINGS PROVIDING PASSIVE SURVEILLANCE OVER PROPOSED OPEN SPACE
7. POTENTIAL LOCATION FOR PROPOSED PRIMARY SCHOOL;
8. POSSIBLE LOCATION FOR A CENTRAL VILLAGE HUB PROVIDING OPPORTUNITIES FOR RETAIL AND COMMUNITY USES;
9. NEWLY PROPOSED RAIL HALT STATION PROVIDING SUSTAINABLE FORMS OF MOVEMENT;
10. A SERIES OF LANDSCAPED COMMONS OFFERING LOCATIONS FOR EQUIPPED AREAS OF PLAY AND SPORTING PURSUITS;
11. NEWLY CREATED "CANALSIDE WALK" LINEAR PARK PROVIDING A LANDSCAPED BUFFER TO THE EXISTING CANAL NETWORK PROVIDING LEISURE AND SOCIAL OPPORTUNITIES FOR RESIDENTS;
12. COMMUNITY ALLOTMENTS TO BENEFIT NEW AND EXISTING RESIDENTS;
13. PLANTED COMMUNITY ORCHARD RETURNING THE AREA TO ITS HISTORIC LAND USE;
14. PROPOSED LOCATION FOR COMMUNITY TRIM TRAIL PROVIDING OPPORTUNITIES FOR COMMUNITY EXERCISE AND SOCIAL INCLUSION;
15. MAXIMUM RETENTION OF EXISTING VEGETATION AND ECOLOGY ON SITE;
16. WETLAND WOODLAND PLANTING AIDING BIO-DIVERSITY AND ECOLOGY ON SITE;
17. NEW STRUCTURAL WOODLAND PLANTING TO CREATE AN ACOUSTIC BARRIER TO EXISTING AND PROPOSED MOVEMENT INFRASTRUCTURE;
18. SERIES OF THEMED GREENWAYS HELPING TO RETAIN EXISTING ECOLOGY WITH OPPORTUNITIES FOR ENHANCED PLANTING AND OPEN EXPANSES OF AMENITY GREENSPACE;
19. MAXIMUM PROVISION FOR PEDESTRIAN MOVEMENT TO PROVIDE MAXIMUM PERMEABILITY THROUGHOUT THE DEVELOPMENT; AND
20. UTILISATION OF EXISTING SITE LOW POINTS FOR SUSTAINABLE URBAN DRAINAGE SOLUTIONS.



CROSS GREEN VILLAGE, FEATHERSTONE | DEVELOPMENT FRAMEWORK PLAN

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APPENDIX 5

Landscape Position Note

Land at Cross Green, South Staffordshire

Landscape Position Note

edp5393_r004d

1. Introduction

- 1.1 This Landscape Position Note has been prepared by the Environmental Dimension Partnership Ltd (EDP) on behalf of Taylor Wimpey UK Ltd (the 'promotor'). The document sets out the findings of a preliminary appraisal in respect of landscape and visual matters to inform the proposed allocation of Land at Cross Green near Wolverhampton, Staffordshire ('the site').
- 1.2 This Landscape Position Note provides technical evidence to assess the suitability of bringing forward development at the site, which can be considered by the Local Planning Authority (South Staffordshire District Council) as part of their current Local Plan Review.
- 1.3 This Landscape Position Note has been informed by a desk-based review of available data, policy, landscape character publications and mapping, and by a site visit undertaken by an experienced and Chartered Landscape Architect in early Summer 2021. The site was also visited in April 2019. On both occasions the visits were during fine, dry weather with excellent visibility. Across the visits the site was experienced in a range of conditions, allowing for a full appreciation of its potential visibility and its context.

2. Site Location, Description and Context

Site Location

- 2.1 The site is situated within the administrative authority of South Staffordshire District Council, and measures approximately 54 hectares (ha), and is located at Ordnance Survey Grid Reference (OSGR) SJ 918 052 (site centre).
- 2.2 The site is located approximately 1.25km west of the village of Featherstone, and approximately 6km north of Wolverhampton City Centre. There are wayside dwellings situated along the Stafford Road (A449), and the nucleated dwellings and farmstead around the site form the most immediate residential setting for the site. The site is shown on **Image EDP 2.1**.



Image EDP 2.1: The Draft Masterplan (December 2021)

Site Description and Context

- 2.3 The site is of a rectilinear shape but contains no development. The majority of the site comprises pasture fields, divided by robust hedgerows and mature hedgerow trees, with small woodland groups situated through the site; see **Photoviewpoint EDP 1 (Appendix EDP 1)** and **Image EDP 2.2**.



Image 2.2: Photograph taken within the site, looking east across it, towards the West Coast Mainline railway line, and HMP Featherstone. The photograph was taken in April 2019 and its location is SJ 91746 05057

- 2.4 The site is enclosed by existing communication routes including: (i) Old Stafford Road and New Road to the north; (ii) the West Coast Mainline railway, which runs north to south along the eastern site boundary; (iii) the M54 Motorway to the southern site edge (see **Photoviewpoint EDP 3, Appendix EDP 1**); and (iv) the Stafford Road (A449) dual carriageway along the western edge of the site.
- 2.5 The western boundary of the site is formed in part by the Staffordshire and Worcestershire canal, which is lined with robust vegetation and mature trees; see **Image EDP 2.3**, and **Photoviewpoint EDP 2 (Appendix EDP 1)**.



Image EDP 2.3: Photograph taken outside of the site's western boundary looking north-east across the site, which is situated beyond the mature tree group. Photograph was taken in April 2019. Viewpoint location is situated at SJ 91581 05495

- 2.6 The site is dissected by two roads, the first of these being Dark Lane, a single-track carriageway running diagonally north-west to south-east through the centre of the site. This narrow country lane is enclosed by robust hedgerows, which define pastoral fields, giving the route a sunken feeling; see **Image EDP 2.4**.



Image EDP 2.4: Photograph taken within the site, on Dark Lane looking south-east through the site. Photograph was taken in April 2019. Viewpoint location is situated at SJ 91681 05791

- 2.7 Secondly, Brinsford Lane, a two-lane carriageway runs west to east across the southern portion of the site. Along this lane, there are a small number of wayside dwellings, farmsteads and agricultural infrastructure including storage barns, including Brinsford Farm; see **Image EDP 2.5**.



Image EDP 2.5: Photograph taken on the south-western site boundary looking east along the edge of Brinsford Lane. Brinsford Farm can be seen in this view. Photograph was taken in April 2019. Viewpoint location is situated at SJ 91516 05214

- 2.8 The north-eastern edge of the site is enclosed by mature tree planting and vegetation situated along the route of the West Coast Mainline railway, which runs along the south-eastern edge, after being dissected by Brinsford Lane, with the railway line passing over the route with a railway bridge. HMP Featherstone is situated approximately 0.25km beyond the site's eastern edge, with further arable and pastoral fields situated between the railway line and Cat and Kittens Lane; see **Image EDP 2.6**. The visual impact of HMP Featherstone can be seen on **Photoviewpoint EDP 4**.



Image EDP 2.6: Photograph taken within the site looking east towards the West Coast Mainline railway. Photograph was taken in April 2019. Viewpoint location is situated at SJ 91789 05047

- 2.9 Along the south-western edge of the site, there are existing two and two and a half storey dwellings, situated on the Stafford Road (A449). The rear of these dwellings is limited by extensive tree groups with agricultural barn type buildings; see **Photoviewpoint EDP 4 (Appendix EDP 1)**.
- 2.10 There are further residential dwellings overlooking the site along the north-western boundary (along the Old Stafford Road). These two- and two and a half storey dwellings are situated on the northern side of the road and look across the site; see **Photoviewpoint EDP 1 (Appendix EDP 1)** which shows a similar view from New Road.
- 2.11 The site has a gentle undulating topography, with the highest landform around its north-eastern and south-eastern (approximately 110m above Ordnance Datum (aOD)), with the western edge around Brinsford Lane and the Stafford Road (A449) sitting at approximately 105m aOD.
- 2.12 There are no public rights of way (PRoW) or public access land within the site. However, the towpath running along the Staffordshire and Worcestershire Canal affords public access along its route on the north-western edge of the site; see **Image EDP 2.3**, and **Photoviewpoint EDP 5 (Appendix EDP 1)**.
- 2.13 The long-distance walking route – the Monarchs Way – passes east to west along Brinsford Lane before joining the wider PRoW network in the wider landscape to the east and west of the site.



HM Prison Featherstone is situated approximately 0.25km east of the site, and the M54 Motorway to the south, and there are limited publicly accessible routes to the east and south of the site. Beyond the M54 to the south, the settlement of Wolverhampton further restricts the availability of PRoW.

- 2.14 The Monarchs Way long-distance walking route runs along the Staffordshire and Worcestershire Canal outside of the site, linking with the Stafford Road (A449) and Brinsford Lane, as detailed above.
- 2.15 There are a number of PRoW situated to the north and west of the site; however, none afford direct access to the site.

3. Relevant Planning Context and Considerations

Local Planning Policy

- 3.1 The site is located within the administrative authority of South Staffordshire District Council, which is the Local Planning Authority. The Local Plan contains a range of policies and land allocations, and is made up of two documents, which are the Core Strategy and the Site Allocations Document (SAD). These two plans replace the 1996 Local Plan and together deliver the local planning strategy for South Staffordshire. The Core Strategy was adopted in 2012 and the SAD in September 2018.
- 3.2 In landscape terms, 'Policy EQ4: Protecting and Enhancing the Character and Appearance of the Landscape' draws attention to the importance of the: 'intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced.' Further emphasise is placed on development coming forward, which ensure that *"the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, and not have a detrimental effect on the immediate environment and on any important medium and long-distance views"*.
- 3.3 It is therefore key that the siting, scale, and design of new development takes full account of the nature and distinctive qualities of the local landscape. The use of techniques, such as landscape character analysis, to establish the local importance and the key features that should be protected and enhanced, will be supported.
- 3.4 Where possible, opportunities should be taken to add character and distinctiveness through the contribution of new landscape features, particularly to landscapes which have been degraded.
- 3.5 It is clear that the Local Planning Authority would require any emerging site masterplan to be developed iteratively through the undertaking of a Landscape Visual Impact Assessment, to ensure the appropriate level of development, siting of new built form, and the effective offsetting, and reduction of likely effects through landscape mitigation initiatives.



Green Belt

- 3.6 The site does not lie within a nationally or locally designated landscape, however, it does lie within the West Midlands Green Belt. The Green Belt designation extends northwards from Wolverhampton, between the edges of Wolverhampton City towards the outlying towns of Stafford and Cannock. The Green Belt excludes the outlying villages of Featherstone, Coven, Codsall and Penkridge, restricting substantive development within this area.
- 3.7 A number of overarching local plan policies relate to Green Belt and the provision of Green Infrastructure. Both can work hand-in-hand, as discussed further below.
- 3.8 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. As such, Green Belt is a planning policy designation rather than a landscape designation based on landscape character and value (i.e. Green Belts are not automatically of high landscape value). Whilst Green Belt has been used to control all development, the focus of the designation is essentially to control the sprawl and creep of urban areas and settlements, and not protect high quality landscapes.
- 3.9 With regards to Green Belt, paragraph 137 of the revised July 2021 NPPF states:
- “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”.*
- 3.10 Paragraph 138 of the July 2021 NPPF sets out five purposes of the Green Belt, listed below:
- *“To check the unrestricted sprawl of large built-up areas;*
 - *To prevent neighbouring towns merging into one another;*
 - *To assist in safeguarding the countryside from encroachment;*
 - *To preserve the setting and special character of historic towns; and*
 - *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land”.*
- 3.11 It is clear from this set of criteria that the relative landscape value or sensitivity of Green Belt land is not a reason for its designation; it is a strategic tool to restrict unacceptable development within areas around and between settlements. In this way, it is very different, for example, from a national or local landscape designation, which are areas defined specifically for their landscape qualities.



- 3.12 The site is currently (largely) a green field site situated within open countryside to the west of Featherstone and north of the City of Wolverhampton. As such, the development of the site would represent a new area of settlement within open countryside. Consequently, the development would encroach into the open countryside, which is contrary to Green Belt purposes as set out within the revised NPPF July 2021; therefore, EDP would recommend a detailed appraisal of the site relative to overall Green Belt functionality.
- 3.13 However, the site has robust defensible boundaries that are well established, and which include the arterial transportation routes of the West Coast Mainline railway, the M54 Motorway and the Stafford Road (A449) dual carriageway, with intervening land between the site and the immediate settlements of Featherstone and Wolverhampton.
- 3.14 With reference to the NPPF, EDP notes the following at paragraph 140:
- “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans...”.*
- And which continues at paragraph 143:
- “When defining Green Belt boundaries, plans should:*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
 - f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.*
- 3.15 Any perceived sense of encroachment would be limited by the dense physical boundaries of the site, which could be further enhanced through hedgerow enhancement, new tree planting, as well as the planting of further woodland blocks within the site, echoing those typically found within the context of the site and in the surrounding countryside. In visual and sensory terms these features enclose and limit the site’s discernibility and the perception of built development across the wider open countryside.
- 3.16 However, at this preliminary stage, a strategy for dealing with Green Belt release would need to be developed, and the site’s function with the designation determined. The existing M54, earthwork embankments and the mature tree components create a robust defensible edge to Wolverhampton. The development of this site has the potential to reduce the perceived openness of Green Belt north of Wolverhampton, and as such, its release may be harmful to the function of the wider Green Belt i.e. between Featherstone and Penkridge.
- 3.17 This would contribute to the perception of sprawl, and the performance of the area in terms openness and permanence (the key purpose of the Green Belt designation), may suffer.



- 3.18 In terms of local plan policy, the development of the site would be contrary to the South Staffordshire District Council's Core Strategy (December 2012) Policy GB1: Development in the Green Belt, unless, for exceptional circumstances the site could be released from the Green Belt.
- 3.19 In their 2014 Green Belt review and the 2016 Partial Green Belt Review, South Staffordshire District Council did not review the site for its Green Belt function; hence, no conclusions were drawn on its function and contribution to the integrity of the Green Belt.
- 3.20 However, South Staffordshire District Council is currently undertaking a review of the adopted Local Plan (Core Strategy and Site Allocations Document) and has carried out a number of Regulation 18 consultations. The review will cover (as a minimum) the following matters:
- South Staffordshire's own local housing need and the potential for housing supply to meet this need;
 - South Staffordshire's potential role in meeting wider unmet housing and employment needs through the Duty to Cooperate;
 - The need for further additional safeguarded housing and employment land for longer term development needs; and
 - A comprehensive Green Belt Review undertaken jointly with the Black Country authorities.

4. Landscape Character and Visual Amenity

- 4.1 At a high level, the site is situated within two National Character Area Profiles (NCAP) 61: Shropshire, Staffordshire and Staffordshire Plain, and (NCAP) 66: Mid Severn Sandstone Plateau, as well as adjoining a further NCAP, that being (NCAP) 67: Cannock Chase and Cank Wood to the site's eastern edge.
- 4.2 However, given the size of the site, and its transitional NCAP location, combined with its location on the edge of an extensive urban area (Wolverhampton City), which adjoins the M54 Motorway, and within close range of the M6 and associated road infrastructure, such a published appraisal is considered too broad-brush to provide an understanding of the character of the site and its local context.
- 4.3 EDP undertook its own field-based assessment during June 2021 which, combined with information published within Staffordshire County Council's 'Planning for Landscape Change Supplementary Planning Guidance' landscape character assessment, enables a much finer grain understanding of the site. Our field-based appraisal is helpful to reach conclusions about the acceptability, in landscape terms, of developing the site, and its possible effects on local character.



4.4 The presence of settlements within the 'Settled Plateau Farmland Slopes' Landscape Character Type is typical, and the Staffordshire County Council's 'Planning for Landscape Change Supplementary Planning Guidance' recognises settlements as typical influence in the landscape following 20th Century urban expansion and infrastructure:

"The proximity of urban edge strongly influences the general character of the landscape...busy, noisy areas, dissected by major transport corridors, railways, quarries and power lines..."

4.5 Given EDP's field-based assessment, the following landscape characteristics are noted as being common to the site:

- *"Gently rolling landform with ore pronounces slopes and undulations in places allowing medium to long distance views across to urban edges of surrounding landscapes;*
- *The proximity of the urban edge strongly influences the general character of the landscape...busy, noisy areas dissected by major transportation corridors...; and*
- *The encroachment of housing and industry urbanises the general character with the deterioration of landscape quality most noticeable at the immediate urban fringe".*

4.6 Reflecting on EDP's field-based assessment, the following is noted with regard to the open countryside surrounding the site area:

- *"Where nearby urban influences impact strongly on the landscape the landcover elements are in decline, with lanes now heavily used as through routes, and large scattered farms now diversifying; and*
- *The landscape there becomes one of an undistinguished character where no one element visually dominates but with an urban fringe feel due to adjacent industrial areas and to the introduction of non-traditional activities".*

4.7 It is clear that the site is influenced by the extensive transportation corridors, including the West Coast Mainline railway, the M54 Motorway, and the Stafford Road (A449) dual carriageway, as well as the nearby HMP Featherstone.

4.8 Furthermore, the development of the former Royal Ordnance Factory (ROF) Featherstone strategic employment site to the east and the construction of the consented Road Option 7 that forms an elevated crossing over the West Coast Mainline railway and crosses the site to connect with the A449, will further influence the site.

4.9 The result of this is that the site has a functional relationship with these urbanising influences rather than the wider open countryside, which it feels almost divorced from due to the physical presence of roadways, railway line and substantial built form (HMP Featherstone and Wolverhampton City) forming the site boundary, or its immediate context.

Visual Amenity

- 4.10 Visual amenity is informed by the underlying character of the host landscape character area, which is of a rolling character with mature hedgerows, trees and agricultural farmland and urban influences, that serve to limit the potential visual envelope of the site (refer to **Appendix EDP 1** for representative viewpoints).
- 4.11 There is no public access within the site area; however, provided below is a review of the visual receptors which are situated adjoining the site boundary.
- 4.12 The extensive tree groups and vegetation along and adjoining the site's southern boundary with the M54 Motorway is sufficient to substantially filter views of the site from the motorway; see **Image EDP 4.1** and **Photoviewpoint EDP 3 (Appendix EDP 1)**.



Image EDP 4.1: Photograph taken within the site looking south-east towards the site boundary with the M54 Motorway screened by mature tree components. Photograph was taken in April 2019. Viewpoint location is situated at SJ 91672 04958

- 4.13 Vehicles travelling along the Stafford Road (A449), where views are transient, oblique to the direction of travel, and for the majority of the site screened by intervening built form on the route, the mature landscape setting of the golf course (The Three Hammers) or mature landscape features along the A449 limits views. These road users would be travelling at speed and would have a low sensitivity to the development of the site; see **Photoviewpoints EDP 3 and 4 (Appendix EDP 1)**.
- 4.14 Rail users travelling along the West Coast Mainline railway along the eastern edge of the site would also be travelling at speed and would have a low sensitivity to the development of the



site. The rail route runs through mature tree groups along the eastern edge of the site limiting the discernibility of the wider site area; see **Image EDP 2.6**.

- 4.15 Users of the local minor routes travelling through the site area including Brinsford Lane and Dark Lane, would have a medium sensitivity to the development of the site; however, the combination of sunken lanes, extensive field hedgerows and the wider field pattern with robust hedgerows and mature hedgerow trees would limit the discernibility of the wider site area; see **Images EDP 3 and 4**.
- 4.16 Those boat users, walkers and cyclists using the Staffordshire and Worcestershire Canal as it passes along the western edge of the site would be sensitive to the development of the site. The users of the canal would have a generally high sensitivity. The mature tree groups along the canal, combined with the robust field hedgerows and hedgerow trees within the site would filter views of the wider site area; see **Photoviewpoint EDP 2 (Appendix EDP 1)**.
- 4.17 Residential dwellings which adjoin the site or overlook it from the local road network would be sensitive to the development of the site. Those most notable are situated on the Old Stafford Road and the junction of the Old Stafford Road with Dark Lane in the north-western edge of the site; see **Photoviewpoint EDP 4 (Appendix EDP 1)**, as well as those nucleated wayside dwellings and farmstead located within the centre of the site; see **Image EDP 2.5**. In these situations, there are direct views into the site; albeit the robust hedgerows and mature hedgerows within the site filter and screen views of the whole site area.
- 4.18 Residential dwellings situated to the south-western corner of the site are oriented towards the site. However, extensive tree planting to the rear substantially filter and screen views of the site; see **Photoviewpoint EDP 3 (Appendix EDP 1)**.
- 4.19 Residential dwellings situated to the west of the Stafford Road (A449) are oriented towards the site and would be sensitive to the development of the site; see **Photoviewpoint EDP 3 (Appendix EDP 1)**; however, extensive tree components to the rear substantially filter and screen views of the site.
- 4.20 With regard to the wider area surrounding the site, EDP notes that whilst there is a strong network of PRow in the wider landscape to the north, west and north-west, the landform remains gently undulating and field patterns are typically small to medium in size with robust field hedgerows and mature tree components, which limits views. From the field-based assessment, EDP finds that the site is not discernible due to the combination of these features; see **Image EDP 4.2**.



Image EDP 4.2: Photograph taken from PRow west of the site beyond the Stafford Road (A449) situated within 0.2km of the site (at its closest point). Photograph was taken in April 2019. Viewpoint location is situated at SJ 91369 04917

- 4.21 Additionally, walkers along the Monarch Way, where its route travels along the Staffordshire and Worcestershire Canal, would have very limited views of the site, if any at all. The combined effect of the undulating landform, mature field hedgerows and trees and intervening built form is in many situations sufficient to screen the site from view; see **Photoviewpoint EDP 5 (Appendix EDP 1)**.

Landscape Sensitivity

- 4.22 In July 2019, South Staffordshire District Council published their 'South Staffordshire Landscape Sensitivity Assessment' (Final Report). This assessment forms an important evidence base for the preparation of the South Staffordshire Local Plan.
- 4.23 The purpose of this study was to provide an assessment as to the extent to which *"the character and quality of landscape abutting is in principle susceptible to change as a result of introducing new built form"*. In terms of scope, this study considers the landscape sensitivity of land within the West Midlands Green Belt which is *"immediately adjacent to selected South Staffordshire settlements (Tier 1-4 settlements)...encompassing locations identified through the South Staffordshire 'Call for Sites' exercises, and land adjacent without promoted sites."*
- 4.24 South Staffordshire District Council define landscape sensitivity as *"the relative extent to which the character and quality of an area (including its vital attributes) is likely to change as a result of introducing a particular type of development."*

4.25 This study appraises parcels of land, some of which are large and expansive tracts of land, and the study includes the site situated within three relatively compact land parcels, identified by South Staffordshire District Council as SL46,47 and 48; see **Image EDP 4.3**.

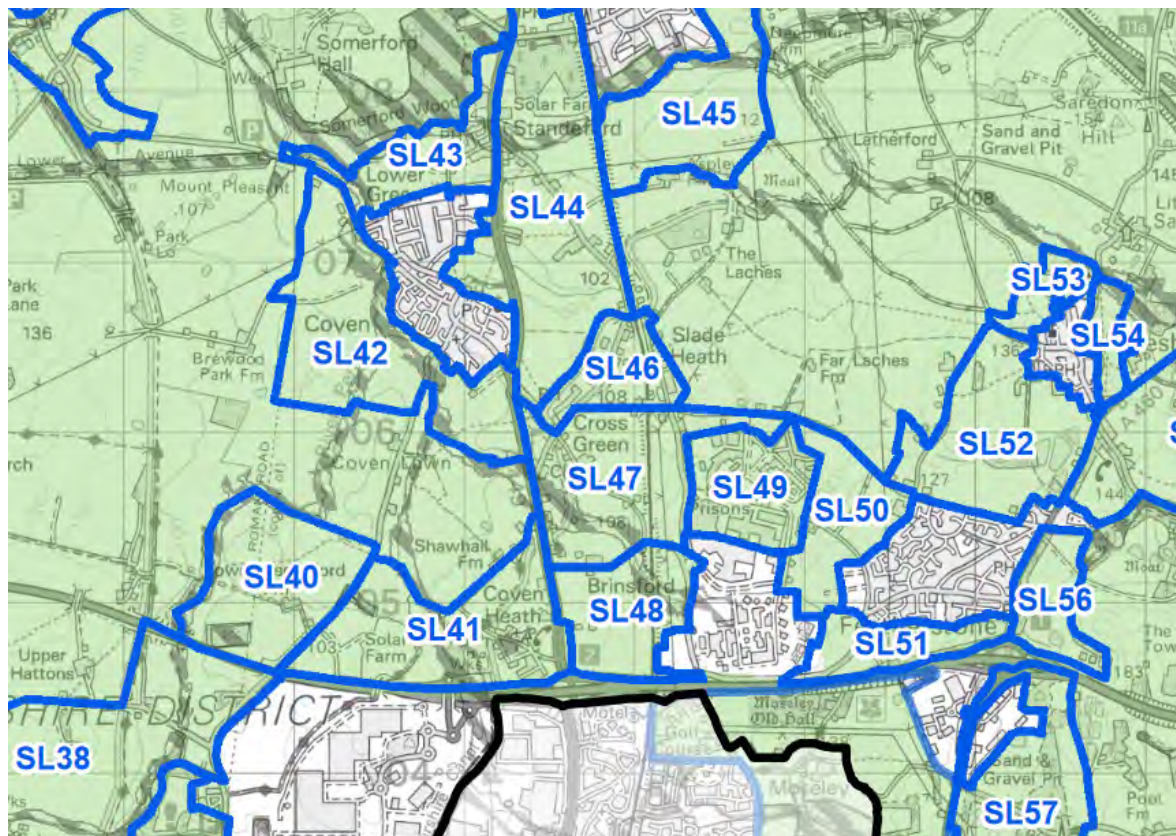


Image EDP 4.3: Extract from the South Staffordshire District Council's South Staffordshire Landscape Sensitivity Assessment (Final Report, July 2019)' Figure 3.2

4.26 With reference to Table 4.1 of the South Staffordshire District Council's South Staffordshire Landscape Sensitivity Assessment, all three of these land parcels have been rated as having a Moderate landscape sensitivity, which it defines as:

"The landscape has some distinctive characteristics and valued qualities, with some sensitivity to change as a result of introducing built development."

4.27 With consideration of our own field-based assessment, EDP considers that the site has a lower landscape sensitivity, for the following reasons:

- The site has limited features of value with its hedgerows, hedgerow trees and topography probably being it's most interesting aspect; however, existing boundary and internal vegetation is commonly poorly managed;
- There are a number of landscape detractors discernible from within the site, which are predominantly associated with the position of the site on the edge of Wolverhampton, and



the adjoining M54 Motorway to the southern boundary. The West Coast Mainline railway runs along the eastern boundary, and the A449 roadway enclosing the western site edge. In combination, these physical features, and transient movement, disrupts the tranquillity of the local area;

- The perception of existing development is common within the site; especially in the southern areas where existing residential development overlooks the site from the western edge;
- Where nearby urban influences impact strongly on the landscape, the landcover elements are in decline, with lanes now heavily used as through routes, and large scattered farms now diversifying;
- The landscape here becomes one of an undistinguished character where no one element visually dominates but with an urban fringe feel due to adjacent industrial areas and to the introduction of non-traditional activities; and
- It is clear that the site is influenced by the extensive transportation corridors, including the West Coast Mainline railway, the M54 Motorway and the Stafford Road (A449) dual-carriageway, as well as the nearby HMP Featherstone, ROF strategic employment site and the new Road Option 7. These features provide significant and prominent physical elements which sandwich and enclose the site.

4.28 Consequently, given the above factors, EDP would most definitely conclude, that the site has less than moderate landscape sensitivity.

5. Conclusion

5.1 Any future development of the site should be informed by a Landscape and Visual Impact Assessment, the findings of which should help inform and shape the scheme design. Overall, the site is considered to have some visual constraints but is generally relatively well enclosed by existing arterial road corridors, a main railway line, as well as residential development and mature landscape features, which substantially filter and screen views to the wider landscape. Consequently, the site is experienced as largely enclosed and the perception of the site is one which is not of such a sizeable area due to the filtering effect of field hedgerow vegetation.

5.2 At this early stage, the preliminary analysis contained in this Landscape Position Note, has identified the following key points on visual amenity:

- The effect of undulating landform, robust hedgerows and mature trees within the site filter and screen the visibility of the site, from within the site. However, there is no public access land, or public access route through the site;



- There is potential for views of the site from the Staffordshire and Worcestershire Canal to the west of the site;
- There is scope for views of the site from travelling around the local minor routes, particularly those running through the site, albeit these routes have a sunken feeling in places (e.g. Dark Lane); and
- There are existing dwellings adjoining the site or overlooking it from the immediate environment; these are mostly situated to the north-west and centrally along Brinford Lane.

5.3 Furthermore, the gently undulating landform within the site, and its surrounding context, further restricts views into the site's interior, by not providing landform of a sloping nature for open views or from elevated topography.

5.4 With regards to the planning advice for the 'Settled Plateau Farmland Slopes' Landscape Character Type, the basic concern for the retention of character is the loss of scale and structure due to the decline and fragmentation of elements of tree cover, mostly notably hedgerow trees and the loss of hedgerows.

5.5 The masterplanning of the site provides opportunity to retain, enhance and integrate field hedgerows and tree components, and create new tree groups and woodland blocks through the undertaking of sensitive masterplanning, and appropriate management for longevity.

5.6 Reflecting the organic field pattern should be considered in the masterplanning process through the shape of newly planting hedgerows and the definition of roadside boundaries and verges. The spatial distribution and orientation of new buildings should also avoid uniformity of pattern, in all cases, and should seek to reduce the impact on those existing residential dwellings adjoins or overlooking the site in its immediate context.

5.7 This preliminary analysis of the site has looked at key considerations in relation to landscape and visual matters, and in particular, discussing the national and local planning policy.

5.8 The desk study and wider consideration of views has found that overall the site is well contained from the wider area. Local topography, off-site and on-site mature trees, hedgerows and woodland are notable features that contribute to the site's containment and should therefore be thoughtfully integrated into the development where they will continue to offer these enhancements to local landscape character and context. As such, clear views towards the site are only really obtainable from a limited number of locations, which, are immediate to the site, or within close range.

5.9 The redevelopment of the site would remove the site from the Green Belt, and whilst the site has the potential to provide permanent, defensible boundaries to maintain a sense of openness across the wider Green Belt, there is a requirement to further understand the function of the site in terms of its Green Belt functionality.



- 5.10 Currently, South Staffordshire district Council has begun the review of the Local Plan (Core Strategy and SAD), which is supported by a Green Belt Review. Further to this, EDP has highlighted the requirement to appraise the site's Green Belt function for the further promotion of the site to the Local Planning Authority in respect of their current review.
- 5.11 Overall, it is EDP's firm opinion that given a responsive masterplan, this site could be released for a new residential development, and its effects could be managed and offset through appropriate and responsive landscape mitigation.
- 5.12 With respect to landscape character, the site has limited features of value, with its topography and field pattern and vegetated field boundaries being its most valuable aspect. Its existing boundary and internal vegetation remain intact, filtering and screening views from the wider area. Furthermore, development of the site would provide an opportunity to improve the tree stock of the site and to bring all vegetation into long-term management, creating new Green Infrastructure within the site.
- 5.13 Residential receptors within close range of the site are perhaps the most sensitive receptors, though private views are not protected in policy terms. Residential amenity is protected, however, and, as such, the scheme design should be sensitive to these receptors, buffering neighboring properties with open space or rear gardens and seeking to provide an attractive, high-quality development in architectural terms.
- 5.14 Overall, this Landscape Position Note has identified no issues which suggest the site is undevelopable in landscape and visual terms subject to an appropriate design coming forward.



Appendix EDP 1
EDP Photoviewpoints
(edp5393_d005a 08 December 2021 CLM/CJM)

Photoviewpoint EDP 1: View from New Road, within the site



To be viewed at comfortable arm's length



To be viewed at comfortable arm's length

Photoviewpoint EDP 3: Viewpoint from south-western edge of the site looking south towards the M54 Motorway



To be viewed at comfortable arm's length



To be viewed at comfortable arm's length



To be viewed at comfortable arm's length



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