



SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW (Preferred Options)

Representations by Hallam Land Management

Addendum report assessing the merits of Land at Sandy Lane, Codsall. (Site 222)

Introduction.

The Sandy Lane, Codsall site extends to 10.8ha (26.7acres) and lies on the northern edge of Codsall village, one of 3 Tier 1 settlements with South Staffordshire District. The site is promoted by Hallam Land Management for around 100-125 new homes and associated infrastructure.

The representations from Hallam Land include:

Firstly, a formal submission responding to the Questions raised by the Council in their Preferred Options document,

Secondly, a Vision Document prepared by consultants FPCR explaining and exploring how the site could be developed for approximately 100-125 homes, respecting the characteristics of the site and its surroundings and reflecting the constraints of the site and its current green belt location,

Thirdly, **this document** which addresses the strengths and weaknesses of the site and potential scheme proposals and their compatibility with the 5 green belt purposes, in comparison with the other sites around Codsall/Bilbrook, in particular the 'East of Bilbrook' proposal (Site 519) included as a suggested allocation in the Council's Preferred Options document.

The submission is also supported by an updated Review of Landscape Character and Visual Amenity Report prepared by consultants, FPCR, prepared in December 2021 (which is attached).

Site Location.

The Sandy Lane site is within 1km of Codsall centre and therefore is close to a wide range of local facilities including;

- a full range of local shops, pubs and café are within 10 minutes' walk, The doctor's surgery, library, police station and the Council offices, which are all within easy walking distance.
- The site is within 200 metres of the St Nicolas First School and 1 km from Codsall Community School. Codsall Middle School is less than 2km away between Codsall and Bilbrook.
- The site is within 1.5km (or 15 minutes' walk/ 10 minutes cycle ride) to Codsall Station which has a new car park, with proposals for a car park extension. Regular trains go to Birmingham and Wolverhampton (eastwards) and Telford and Shrewsbury (westwards),
- There is a regular hourly bus service (no 5) to Wolverhampton which terminates at Church Road, Codsall and passes within 200metres of the site. A separate 2 hourly service (10b) travels to Wolverhampton via Perton.
- There are a full range of sporting and recreational facilities on the periphery of Codsall and Bibrook. There are allotments adjacent to the site. The Leisure Centre is at Bilbrook.

Site potential.

The GL Hearn/Wood report in 2018, which was commissioned by the Metropolitan Authorities to explore the Greater Birmingham and Black Country overspill pressures, identified a 'Proportionate Dispersal' Growth Area to the north of Codsall (Location PD2) contiguous with the Sandy Lane site (222), one of only 7 in the whole region. This has evidently not been taken up by the District Council.

In contrast, the report identified an area of 'Localised green belt protection' between Codsall & Bilbrook and Wolverhampton over which the Council now propose to release the 'East of Bilbrook' site. This would seem to be extremely contradictory and contrary to good planning practice.

Site status/Green belt impact.

The Sandy Lane site is largely but not wholly greenfield and (together with all the peripheral sites around Codsall/Bilbrook), is designated as Green Belt. The criteria for the release of GB sites relate directly to the 5 formal reasons for designating and protecting green belt and subsequent use of the land. (The attached spreadsheet summarises the potential impact of the sites on the green belt against the 5 criteria within the reasons for the designation of green belt cited within the NPPF).

It should be emphasised that landscape is not a criterion for the designation nor the protection of green belt, nor is the provision of additional infrastructure. The spreadsheet does not include comparisons of the Keepers Lane site (419), south of Codsall, since it is already designated as 'Safeguarded Land' and hence doesn't feature in the LUC Green Belt site assessments, nor does it include the Histon Hill site (228), since this is brownfield site and is already allocated for housing development – although in view of its location, it may be more appropriate for employment uses.

The spreadsheet overleaf shows that the Sandy Lane site performs well against the other two sites. Indeed, it is clear that the release of the Sandy Lane site from the green belt would have potentially less impact on the integrity of the green belt than either 'Station Road' or 'East of Bilbrook' since:

Firstly, unlike the East of Bilbrook site which would effectively join Codsall/Bilbrook with Wolverhampton, neither the Sandy Lane site nor the Station Road site would create coalescence,

Secondly, the LUC report categorises the impact of the Sandy Lane site and the Station Road sites as 'Moderate' in terms of 'unrestricted sprawl' compared with 'strong' for the 'East of Bibrook' site,

Thirdly, the LUC report categorises the Sandy Lane site and the Station Road site as having a 'moderate/high' harm rating, compared to 'high' and 'very high' for the East of Bilbrook site.

Landscape and visual.

The Council undertook an in-house Landscape Sensitivity Study in 2015. This used large 'Land Parcels' in which the Sandy Lane site (222) was combined with other land on the West, North and East of the Codsall Conservation Area within 'Land Parcel CD8'. In a 'RAG' (Red/Amber/Green) assessment the study therefore categorized the CD8 zone as 'High' sensitivity (Red), whereas the recently completed Taylor Wimpey site at Watery Lane was categorized as 'Low' sensitivity (Green) - despite the two sites having very similar characteristics. The 'East of Bilbrook' site was categorized as 'low' (green) as was the Station Road site. The results of this exercise seem very questionable.

The 2019 Green Belt LUC study (referred to above) included an assessment of landscape harm which somewhat contradicted the 2015 results. The Sandy Lane site (Parcel S37) was regarded as 'moderate/high' sensitivity (although again this included all the land wrapped around the Codsall Conservation Area to the west and north, whilst the Station Road site is regarded as 'high'. The 'East

of Bilbrook' site was regarded as 'moderate' (but covers a more extensive area of land on the edge of Wolverhampton with lower landscape quality which would explain the lower landscape grade).

Hallam Land has commissioned FPCR to undertake a Review of Landscape Character and Visual Amenity (2021). This comments that in terms of green belt impact the Sandy Lane Land Parcel meets a score of no more than 3 (out of 5) in only one of the 5 purposes. It also expresses concern about the variation of landscape quality within the Land Parcels, and especially the linkage between the Sandy Lane site with the areas around the Conservation Area which tend to skew the results. It further comments that the recent completion of the Wheatfield Manor scheme (by Taylor Wimpey) to the east of the Sandy Lane site completely changes the landscape context. The Sandy Lane site is now enclosed on three sides by development. The report further comments that no public consultation preceded the publication of the Landscape Assessment.

The FPCR report concludes that the Sandy Lane site is well contained and although attractive has no pronounced scenic quality. It has well defined boundaries which would assist with its release. The report also explores the various methods of mitigation which could be used to assimilate any future Sandy Lane development into the landscape. (This report is attached as part of our submission).

Heritage and Design.

In addition to the Staffordshire Environmental Character Assessment undertaken in 2011 which is largely generic in content, the District Council undertook a Heritage Environmental Assessment Stage 1 report in 2019 which looked at the characteristics of each potential development site. The Sandy Lane site (222) like the Station Road site (224) was categorized as having a 'Green' score in terms of its '**direct**' impact meaning that '*there were no concerns identified, on current evidence, although archaeological mitigation measures may be required*' with an 'Amber' score in relation to possible '**indirect**' effects, meaning that 'there are no significant effects which cannot be mitigated or predicted'. The 'East of Bilbrook Site' scored a 'green' for both 'direct' and 'indirect' effect. This is regarded as a fair representation by the Hallam Land team, however there is always scope for mitigation of heritage impact effects through design and layout. Our comments below reflect this.

Historic evidence does not tend to age or 'decay'. A study undertaken by CGMS on behalf of Hallam Land Management in 2014 explored all the surrounding heritage assets and examined the extent to which the development of the Sandy Lane, Codsall site could impinge on the adjacent Conservation Area. They concluded that by leaving a buffer zone with trees and planting alongside the edge of the Conservation Area boundary, coupled with careful design and planting, there would be no adverse impact on the Conservation Area nor the church of St Nicolas within it. The Sandy Lane site slopes down gently from the edge of the Conservation Area and therefore any views from locations and buildings within the conservation area (and the Staffordshire Way footpath which borders the site to the west) will largely be across the top of the site – seeing just a roofscape and vegetation.

The key objective of the Vision Plan produced by FPCR has been to minimize the impact of any development on surrounding heritage and landscape assets, to use the benefit of the downward slopes to orient the houses towards the south and east and to integrate the development with the adjacent recently completed Wheatfield Manor scheme using the balancing ponds and public open space as a centrepiece. (The Vision Report is attached as part of our submission).

In terms of housing design, the Sandy Lane site offers advantages to create an attractive environment with a pleasant aspect without spoiling the views of established houses alongside Sandy Lane (which are largely screened by the wide plots of the established houses on the north side of the lane) as well as creating sustainable drainage and energy efficient dwellings.

Access, Transport and traffic.

A recent report by Bancroft Consulting on behalf of Hallam Land Management shows that the Sandy Lane site is extremely accessible by both public transport (both bus and rail) both of which are within comfortable walking distance and also in terms of road access. The Sandy Lane site potentially has two access points, one from Sandy Lane itself, and the second from Watery Lane (although it is currently envisaged that the latter will just be used as a cycle route and footpath. (There is no need to disturb the residents of Wheatcroft Manor by linking the site through the Taylor Wimpey site to access the roundabout at Watery Lane). Subject to agreement, we would anticipate a pedestrian link between the two sites to create integration.

Traffic assessments predict that the impact of traffic on Sandy Lane will be manageable insofar as the road has the capacity to absorb future car generation, although the developer will introduce measures to mitigate car use through Green Travel Plan and encouraging home working.

Additional infrastructure.

Hallam Land have not yet been invited to discuss any additional infrastructure which might be sought by the Council as part of the Sandy Lane proposal. Indeed, it would be inappropriate to factor this into any decisions about the merits of releasing land from the green belt. (The willingness to deliver infrastructure should not be a consideration in the release of green belt sites). There may well be infrastructure benefits arising from the development of the Sandy Lane site in terms of building extra care or retirement dwellings, delivering public open space and providing pedestrian and cycle links through the site to the allotments and to Watery Lane beyond.

The site is within walking distance (200 metres) of the St Nicolas First School and hence a First School should not be needed by virtue of the development of the Sandy Lane site – nor should it influence the possible release of the ‘East of Bilbrook’ site either.

Sustainability Appraisal.

The Council has undertaken a draft Sustainability Appraisal as part of the site selection exercise. This 688 page document assesses both the policies and the proposals in the Preferred Options document and ostensibly measures the merits of the sites against the Council’s Objectives and the NPPF.

Table 4.4 in Appendix B (pages 78-87) of the document provides a series of colour charts comparing the merits of each site (in order of settlement) in terms of their pre-mitigation achievement of the Council Strategic Objectives. These show that the Sandy Lane site performs well against other sites in the settlement and better than both the Station Road site (224) and the ‘East of Bilbrook’ site (519). This is despite its disadvantage is being categorized alongside other more sensitive land around the Codsall Conservation area which gives it a ‘red mark’ in terms of ‘Landscape and Townscape’. Indeed, the Sandy Lane site scores amongst the best performing sites in terms of biodiversity, geodiversity, and health and wellbeing.

The post mitigation site assessments in Table E2.1 within Appendix E show a slightly revised assessment of the suitability of sites. Once again, however, the Sandy Lane site (222) scores well with a positive score for ‘climate change adaptation’ and even better against the ‘East of Bibrook’ site. The Sandy Lane site has **not** however been selected for allocation within the Preferred Options.

In contrast, the Station Road site (224) and the much larger ‘East of Bilbrook’ site (519) have been selected. NB. In the latter case just under 50% of the site was allocated and or designated as Safeguarded Land in the previous Site Allocations Plan (2018) and is therefore already committed.

Appendix 7 of the provides reasons for the selection and rejection of sites.

Against the **Sandy Lane site** (222) Appendix F of the document states:

Key positives and negatives

- Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high')
- In a higher sensitivity landscape to the majority of land around Bilbrook/Codsall ('moderate/high'),
- Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.
- Potentially large enough to accommodate required First School, but no confirmation from site promoter that land is available to deliver this on the site, which is also smaller than other larger land parcels with potential to accommodate this around the villages.

Conclusion

Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Sites 519, 224, SAD Site 228 and 419a&b.

Against the **Station Road site** (224) Appendix F of the document states:

Key positives and negatives

- Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is 'moderate/high')
- In a higher sensitivity landscape to the majority of land around Bilbrook/Codsall (site is 'high'),
- Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence
- Located in very close proximity to Codsall station, with landowner indicating willingness to deliver additional station parking

Conclusion

Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside other Sites etc'

Against the **'East of Bibbrook Site'** (519) Appendix F of the document states:

Key positives and negatives

- Part of site is an existing safeguarded land allocation made in the Site Allocations Document 2018,
- Remainder of site is of similar Green Belt harm to the majority of land around Bilbrook/Codsall (site is 'high'),
- Similar landscape sensitivity to the majority of land around Bilbrook/Codsall (site is 'moderate')
- Due to site size, has capacity to deliver required first school to serve the villages,
- Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.

- Site provides scope for unique design benefits including a through road linking Lane Green Road to Pendeford Mill Lane (as required by the Site Allocations Document 2018) and close links to existing active travel links to strategic employment site (i54) and services in the Black Country.

Conclusion

Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the site is considered to perform better than other site options and could deliver the Council's preferred strategy for Bilbrook/Codsall if delivered alongside Sites 224, SAD Site 228 and 419a&b.

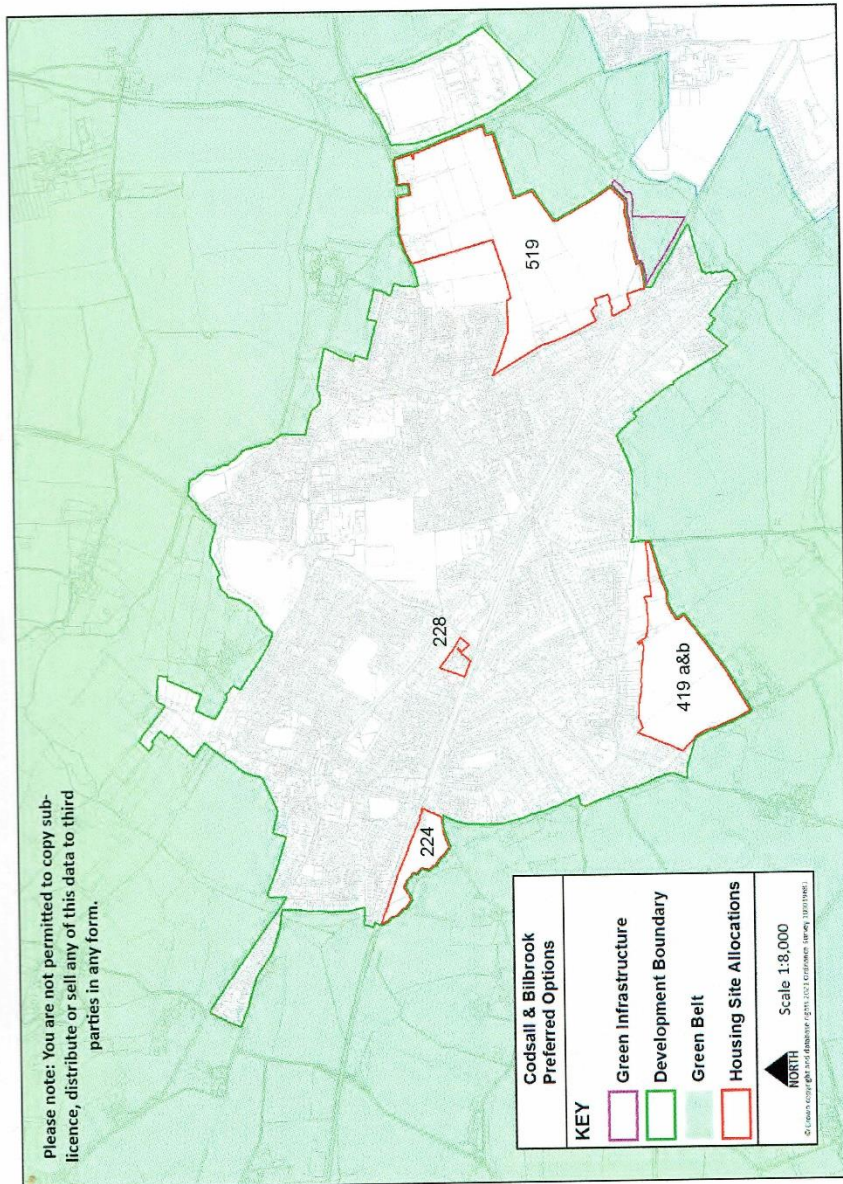
Hallam Land Comment.

1. It is clear from the assessment that in overall terms the Sandy Lane site **scores better** than its competitors, rather than worse.
2. In terms of green belt criteria and potential harm (and these will be the criteria the Council will need to use to justify a green belt release) the Sandy Lane site **performs better** than both the other sites. The 'East of Bilbrook' assessment (above) is misleading in stating that the East of Bilbrook site performs similarly to most of the area around Codsall/Bilbrook which is 'high'. It isn't. The area to the north and west, including the Sandy Lane site is moderate/high and runs no risk of coalescence which is an essential purpose of green belt.
3. The landscape quality at Sandy Lane is slighter better, because of the Parcel sizes, but (unlike green belt harm) this can be mitigated. The reference to the Association of Black Country Authorities evidence is unclear and confusing. The ABCA cannot override national green belt policy or elevate landscape quality over green belt designation criteria.
4. The reference within the East of Bilbrook site to the offer of a road and a First school is inappropriate and suggests that the Council has been unduly swayed by the willingness of a developer to provide a First School (which would probably be necessary in any event for a development of 848 dwellings). Similarly, the offer of an extension to the car park (on site 224) should not influence the Council to release land from the green belt unless it is appropriate to do so. Furthermore, the stated lack of an offer from the land promoter (for Sandy Lane) to deliver a new First School is totally irrelevant. It would be unnecessary for a First School to be provided for a site of only 100-125 dwellings. More important it would be completely unethical for inducements to be offered to build a school or for this to be offset against the release of a site from the green belt to overcome other constraints. In any event, no approach has been made, so the comment in the text is fundamentally misleading.
5. The text in relation to Site 224 Station Road cites the willingness of the developer to provide a station car park but does not mention the countervailing impact on the proposed dwellings in terms of railway noise. This is a relevant issue.
6. Finally, the statement in each of the conclusions that '*Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the sites at 'Station Road' and 'East of Bilbrook' are considered to perform better than other site options' whereas the statement against the Sandy Lane site that it performs less well than other sites* – is simply untrue and totally misleading.

Codsall/Bilbrook Sites Comparative assessment. Green = good Blue = Bad	Site 222 Sandy Lane 10.3ha (125)	Site 224 Station Road 4.0ha (85)	Site 519 East of Bilbrook 39.6ha (848)
Status of site	Green belt	Green belt	Green Belt
Accessibility to shops	Good	Good	Poor (New local centre required)
Accessibility to schools	Good	Poor	Moderate (New First school required)
Accessibility to public transport	Good	Good	Good
2019 LUC report LUC GB Purpose 1 Fig5.1b Check unrestricted sprawl	Moderate	Moderate	Strong
LUC GB Purpose 2 Fig5.2a Prevent Merging of towns	Weak	Weak	Weak???
LUC GB Purpose 3 Fig5.3a Safeguard the countryside	Strong	Strong	Strong
LUC GB Purpose 4 Preserve setting of historic towns.	Weak	Weak	Weak
LUC GB Purpose 5 Assist in urban regeneration	Strong	Strong	Strong
LUC Assessment of GB harm	Moderate/High (But no mention of adjacent new Watery Lane site)	Moderate/High	High/Very high
Actual coalescence	None possible	None possible	Significant coalescence
Definition of boundaries. Site enclosure/containment	Enclosed on 3 sides.	Edge of village site	Extension of village. Elevated & exposed site
Definition of Boundaries Physical features	Scope for clear edge defined by hedges.	No clear features. Scope for hedge.	Road and Canal on edge of Wolverhampton
Landscape Assessment. 2015 SSDC in house report	High sensitivity	Low sensitivity	Low sensitivity
Landscape Assessment 2019 LUC report	Moderate/High	High	Moderate
Historic Environment Assessment by AOC Archaeology Group (SSDC)	Green (Direct) no impact Amber (Indirect) low	Green (Direct) no impact Amber (indirect) low	Green (Direct) Green (Direct)
Agricultural Land Quality (Natural England data)	Grade 4 Lower quality	Grade 3 Moderate quality	Grade 2 Best and most versatile
Site Potential. Independent GL Hearn/Wood report. Greater Birmingham and Black Country HMA.	Recommends Growth Point (Location PD2)	No recommendation	Recommends area of protection against coalescence.

Appendix C Housing allocation maps and proformas

Tier 1 Bilbrook & Codsall



Site Reference	1 Climate Change Mitigation	2 Climate Change Adaptation	3 Biodiversity & Geodiversity	4 Landscape & Townscape	5 Pollution & Waste	6 Natural Resources	7 Housing	8 Health & Wellbeing	9 Cultural Heritage	10 Transport & Accessibility	11 Education	12 Economy & Employment
210	+/-	+	+/-	--	-	-	+	-	-	-	++	+
211	+/-	--	+/-	-	-	-	+	-	-	-	-	-
213	+/-	-	+/-	0	-	+	+	-	-	++	++	+
221	+/-	-	+/-	--	-	-	+	-	-	-	++	+
222	+/-	-	+/-	--	-	-	+	-	-	-	-	-
224	+/-	--	+/-	--	-	-	+	-	-	-	-	+
SAD 228	+/-	+	+/-	-	-	+	+	-	-	++	++	+
236	+/-	-	+/-	--	-	-	+	-	-	-	--	--
419a/b	+/-	+	+/-	-	-	-	+	-	-	-	--	-
447	+/-	--	+/-	--	-	-	+	-	-	-	-	+
503	+/-	--	+/-	--	-	-	+	-	-	-	++	+
507	+/-	-	+/-	--	-	-	+	-	-	-	-	-
510	+/-	--	-	--	-	-	+	-	-	-	++	+
512	+/-	--	-	--	-	-	+	-	0	-	--	-
515	+/-	+	+/-	--	-	-	+	-	-	-	--	-
519	+/-	--	+/-	--	-	-	+	-	-	-	-	-
630a	+/-	+	+/-	--	0	-	+	-	-	-	--	-
630b	+/-	--	+/-	--	-	-	+	-	-	-	--	-
666	+/-	--	-	--	-	-	+	-	-	-	-	-
703	+/-	+	+/-	--	-	-	+	-	-	-	-	-

B.2.1 SA Objective 1 – Climate Change Mitigation

B.2.1.1 See section 3.1.

B.2.2 SA Objective 2 – Climate Change Adaptation

B.2.2.1 **Fluvial Flooding:** Sites 211, 221, 503, 512, 519, 630b and 666 are located partially within Flood Zones 2 and 3. The proposed development at these seven sites could potentially locate some site end users in areas at risk of fluvial flooding, and therefore, a minor negative impact would be expected. Sites 210, 213, 222, 224, SAD228, 236, 419a/b, 447, 507, 510, 515, 630a and 703 are located wholly within Flood Zone 1. A minor positive impact would be expected at these 13 sites, as the proposed development at these locations would be likely to locate site end users away from areas at risk of fluvial flooding.

E.2 Post-mitigation site assessments

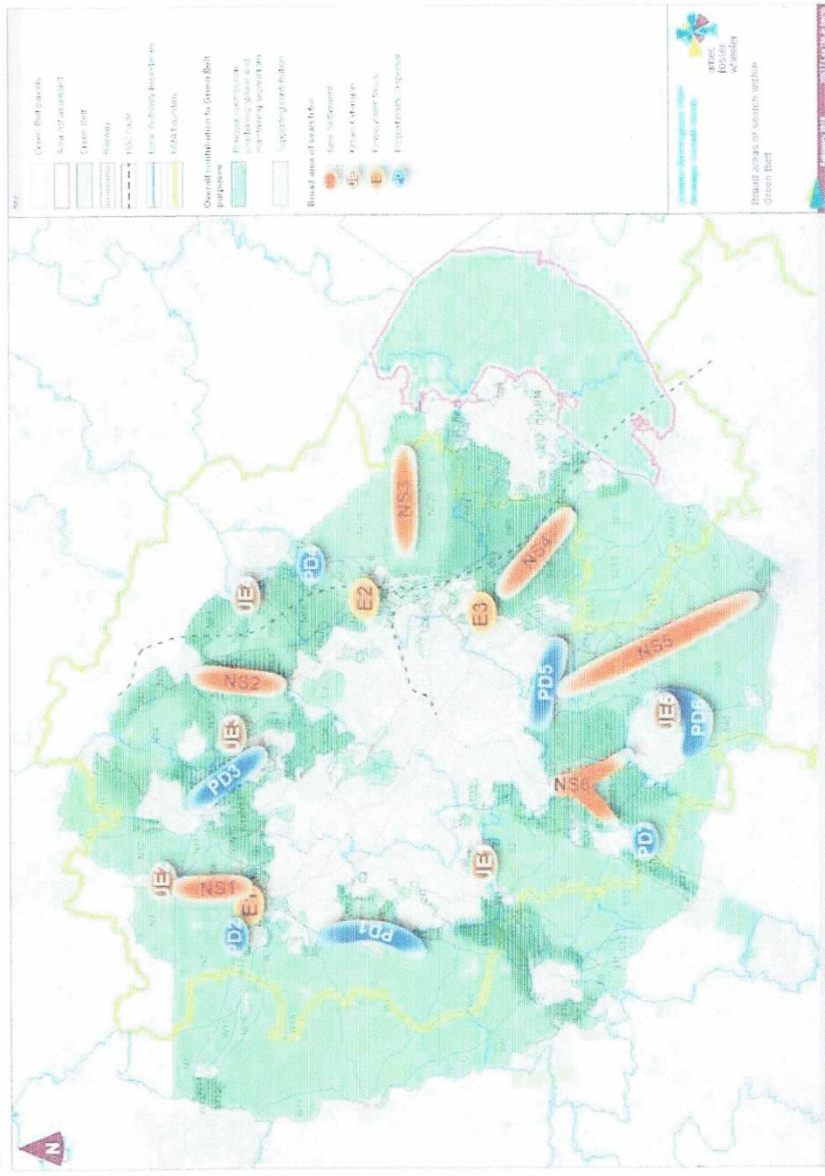
E.2.1 Overview

E.2.1.1 The impact matrices for all reasonable alternative site assessments post-mitigation are presented in **Table E.2.1**. These impacts have been identified following consideration of the likely mitigation effects of the draft strategic and DM policies as discussed in **Table E.1.1**.

Table E.2.1: Impact matrix of site assessments post-mitigation

Site Reference	1 Climate Change Mitigation	2 Climate Change Adaptation	3 Biodiversity & Geodiversity	4 Landscape & Townscape	5 Pollution & Waste	6 Natural Resources	7 Housing	8 Health & Wellbeing	9 Cultural Heritage	10 Transport & Accessibility	11 Education	12 Economy & Employment
Bednall												
023	+/-	+	+/-	--	0	-	+	-	0	-	-	--
024	+/-	+	+/-	--	0	-	+	-	0	-	-	--
026	+/-	+	+/-	--	0	+	+	-	+/-	-	-	--
Bilbrook and Codsall												
210	+/-	+	+/-	--	-	-	+	-	0	-	++	+
211	+/-	0	+/-	-	0	-	+	-	0	-	-	-
213	+/-	+	+/-	0	0	+	+	-	0	++	++	+
221	+/-	0	+/-	--	0	-	+	-	0	-	++	+
222	+/-	+	+/-	--	0	-	+	-	0	-	-	-
224	+/-	+	+/-	--	0	-	+	-	0	-	-	+
SAD 228	+/-	+	+/-	0	0	+	+	-	0	++	++	+
236	+/-	+	+/-	--	-	-	+	-	0	-	--	-
419a/b	+/-	+	+/-	-	0	-	+	-	0	-	--	-
447	+/-	+	+/-	--	0	-	+	-	0	-	-	+
503	+/-	0	+/-	--	-	-	+	-	0	-	++	+
507	+/-	+	+/-	--	0	-	+	-	0	-	-	-
510	+/-	+	+/-	--	-	-	+	-	0	-	++	+
512	+/-	0	+/-	--	-	-	+	-	0	-	--	-
515	+/-	+	+/-	--	0	-	+	-	0	-	--	-
519	+/-	0	+/-	--	-	-	+	-	0	-	-	-
630a	+/-	+	+/-	--	0	-	+	-	0	-	--	-
630b	+/-	0	+/-	--	-	-	+	-	0	-	--	-
666	+/-	0	+/-	--	-	-	+	-	0	-	-	-
703	+/-	+	+/-	--	0	-	+	-	0	-	-	-
Bishops Wood												
096	+/-	+	+/-	--	0	-	+	-	0	-	-	-
097	+/-	+	+/-	--	0	-	+	-	0	-	-	-
099	+/-	+	+/-	--	0	-	+	-	0	-	-	-

Figure 1: Shortlisted areas of search within the Green Belt from the GBHMA Strategic Growth Study





Overall Conclusions.

The summary spreadsheet demonstrates very clearly (showing the positive scores in darker green and the negative scores in pale blue) that the Sandy Lane site scores well above both the Station Road site and the East of Bilbrook site – the latter scores particularly poorly. It should be emphasized that these are not subjective judgements but simply the interpretation of the Council's and the consultants' evidence and the survey results.

The ?? marked against the LUC findings for 'merging of town's (GB Purpose 2) on the table is because the consultants have failed to acknowledge the critical impact of the merging of Codsall/Bilbrook with the edge of Wolverhampton which is a fundamental purpose of green belt policy. This is picked out specifically in the LG Hearn report in relation to the Codsall/Bilbrook and Wolverhampton gap which recommends an Localised Area of Protection. This is a serious weakness in the LUC findings and clearly influences the results of the SA to the detriment of the Sandy Lane site.

The standard (and repeated) statements in the conclusions of each of the individual assessments that *'Having regard to all site assessment factors set out in the proforma and other development options in Bilbrook/Codsall, the sites at 'Station Road' and 'East of Bilbrook' are considered to perform better than other site options'* or that Sandy Lane site has not been chosen because it performs worse are clearly fundamentally misleading and frankly untrue. This needs to be rectified in an immediate revision to the Sustainability Appraisal.

On reflection, once the Council has had the opportunity to review the evidence presented on the Sandy Lane site – and the outcome of this report, the Council needs to seriously review their decision on the choice of sites and consider allocating the Sandy Lane site for future development.

John Acres

ACRES LAND & PLANNING Ltd

13th December 2021

