

SOUTH STAFFORDSHIRE LOCAL PLAN 2018-38 PREFERRED OPTIONS

LAND AT THE STRAITS

ON BEHALF OF BLOOR HOMES



TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

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1. Introduction

- 1.1 This representation, submitted on behalf of Bloor Homes, responds to the Regulation 18 'Preferred Options' consultation document and accompanying published evidence, having regard to the national and local planning policy context. It relates specifically to Land at The Straits where Bloor Homes 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.

2. Planning Policy Context

2.1 Bloor Homes 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 Bloor Homes 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 2038 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, which identified a proposed settlement hierarchy and an 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 Preferred Options consultation document identifies preferred site allocations to meet the preferred strategy, including a number of strategic housing allocations (SA1).

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the Local Plan?

2.6 Appendix A identifies a broad range of evidence documents to be relied upon by the Council in formulating the Local Plan.

2.7 Concern is raised that the following documents, which were referenced in the Spatial Housing Strategy consultation document, are no longer listed:

- Greater Birmingham HMA Strategic Growth Study.
- Strategic Housing & Employment Land Availability Assessment

2.8 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 shortfall.

2.9 The Strategic Housing & Employment Land Availability Assessment (SHELAA) establishes the broad range of site options to be tested by the Council in determining the appropriate housing and employment allocations necessary to meet identified needs.

2.10 In addition, it is considered the Self Build & Custom Build Register should be identified as part of the evidence base to inform emerging policies in respect of housing needs and mix.

Question 2: Do you agree that the correct infrastructure to be delivered alongside proposed site allocations has been identified in the IDP?

- 2.11 Bloor Homes 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.
- 2.12 The IDP, identifies the correct infrastructure projects to support the proposed spatial development strategy based upon the evidence currently published. Bloor Homes recognises that the IDP is a living document and further evidence planned for publication may influence site specific infrastructure requirements.

Question 3a: Have the correct vision and strategic objectives been identified?

- 2.13 The Vision is clear and succinct, however as presently drafted it doesn't appear locally relevant and contains no spatially specific elements.
- 2.14 Bloor Homes 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.

Question 3b: Do you agree that the draft policies and policy directions will deliver these objectives?

- 2.15 Bloor Homes considers the draft and emerging policies will assist in delivering these objectives.

3. Development Strategy

3.1 Bloor Homes 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.

Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside?

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 Bloor Homes agrees that exceptional circumstances exist for Green Belt release within the District to allow for sustainable development within the plan period.

3.4 The consultation document 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.

3.5 Consideration also needs to be given to the permanence of the Green Belt beyond the current plan period.

3.6 Paragraph 140 of the NPPF states:

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”

3.7 The consultation document 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.

3.8 The proposed spatial development strategy for the period to 2038 can demonstrate exceptional circumstances for the release of Green Belt to deliver sustainable growth to 2038 and, in light of the District Green Belt constraints, further Green Belt release will be required beyond 2038 to meet future development requirements, even if such requirements only relate to meeting local housing needs.

3.9 The Site Allocations Document identified a number of safeguarded land sites to meet longer term growth requirements and this Local Plan review should take a similar approach to ensure Green Belt boundaries endure well beyond the plan period.

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038?

3.10 Bloor Homes generally supports the policy approach set out in Policy DS3 (The Spatial Strategy to 2038), however further commentary is set out below in respect of different elements of the spatial strategy relevant to housing delivery.

Local Housing Need

3.11 The Strategic Housing Market Assessment (SHMA) sets out a minimum housing requirement of 254 dpa based on the Government's standard method. 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.

3.12 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;*

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

3.14 These circumstances are considered in further detail below.

Unmet Need from Neighbouring Authorities

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

3.16 The Birmingham City shortfall was tested through the BDP EiP and an unmet housing need to 2031 of 37,900 homes was confirmed upon adoption.

3.17 The Black Country LPAs are currently undertaking a review of the Black Country Plan which is aligned to the timescales of the South Staffordshire Local Plan review. Evidence that has 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.

3.18 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.

3.19 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.

3.20 Bloor Homes supports the Council's 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 shared evidence produced by constituent LPAs within the HMA.

Economic Uplift

3.21 The SHMA sets out the broad economic consequences of the projected growth in Chapter 5, highlighting that the working age population will increase by 3,489 people between 2018 and 2038, which represents growth of 5.4%. If the

current job density is maintained in 2038 it is anticipated that an extra 1,989 new jobs will be required to support the uplift in the working age population. Jobs growth would need to rise to 2,826 to support an increased job density in line with the wider West Midlands region.

- 3.22 The number of jobs likely to be created within South Staffordshire is likely to significantly exceed the 2,826 required to support the West Midlands regional job density by virtue of committed development at the West Midlands Interchange (WMI) which in 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. In addition, significant jobs growth will be provided through committed strategic employment developments planned at i54 and ROF Featherstone.
- 3.23 At present the SHMA fails to consider 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. This balance is important to ensure sustainable commuting patterns and reduce in-commuting from the Black Country.
- 3.24 Further evidence is required 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.

Settlement Hierarchy

- 3.25 Bloor Homes 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 2,500 homes focused to neighbouring towns and cities within the plan period.

Spatial Distribution of Housing Growth

- 3.27 Bloor Homes supports the proportionate distribution of housing growth through the identification of 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 Bloor Homes 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 adjacent to the Black Country conurbation where a 28,239 home shortfall in provision has been identified.
- 3.29 This strategy provides the opportunity to ensure that the necessary homes, along with supporting infrastructure, can 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.
- 3.30 Concerns are however raised that insufficient growth has been focused to western edge of the Black Country conurbation. The GBBCHMA Strategic Growth Study recommended this broad location capable of accommodating dispersed housing growth of between 500 and 2,500 dwellings. The emerging spatial development strategy only seeks to allocate one site for approximately 390 dwellings. This is below the 500 dwelling lower limit for this broad location as identified within the Strategic Growth Study.

Question 6: Do you support the policy approach in Policy DS4 – Longer Term Growth Aspirations for a New Settlement?

- 3.31 Bloor Homes notes Policy DS4, which recognises the Council's aspiration to explore the potential for a sustainable, independent new settlement.
- 3.32 Policy DS4 recognises that such an option would not contribute to housing growth during the proposed plan period to 2038 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.
- 3.33 Support for a new settlement in the longer term should not be at the expense of supporting growth in the sustainable settlements beyond the plan period. As discussed previously, safeguarded land should be identified within this Local Plan to provide permanence to the Green Belt boundary and to support longer term growth requirements. This balanced approach would allow for longer term growth to meet longer term needs within the villages and neighbouring LPAs alongside strategic growth within a new settlement.

4. Site Allocations

4.1 Bloor Homes has a number of land interests within South Staffordshire District. This representation relates to Land at The Straits and should be read in conjunction with other representations submitted in respect of the proposed allocations.

Question 7a: Do you support the proposed strategic housing allocations in policies SA1-SA4?

4.2 Bloor Homes supports the proposed identification of strategic housing allocations and has land interests at East of Bilbrook and North of Penkridge.

Question 7b: Do you agreed that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?

4.3 Bloor Homes recognises the importance of the four proposed strategic housing allocations in delivering the spatial strategy for the District to 2038. Due to the scale of the four sites Bloor Homes supports the inclusion of site-specific policies to establish a vision for each site, alongside a requirement for a detailed masterplan and design code.

4.4 The key infrastructure and design requirements are helpful in informing the masterplan and design code.

Question 8: Do you support the proposed housing allocations in Policy SA5?

4.5 This representation relates to Land at The Straits. Further comments in respect of the proposed housing allocations contained in Policy SA5 are set out in other representations submitted on behalf of Bloor Homes.

4.6 Concerns are however raised that insufficient growth has been focused to western edge of the Black Country conurbation. The GBBCHMA Strategic Growth Study recommended this broad location capable of accommodating dispersed housing growth of between 500 and 2,500 dwellings. The emerging spatial development strategy only seeks to allocate one site for approximately 390 dwellings. This is below the 500 dwelling lower limit for this broad location as identified within the Strategic Growth Study.

4.7 As set out above, Bloor Homes raises concerns that insufficient growth has been focused to western edge of the Black Country conurbation and Land at The Straits (Sites 560 and 566) should represent additional allocations for

development. Further information of the suitability and deliverability of Land at The Straits is contained within chapter 6 to this representation.

- 4.8 In addition, safeguarded land should be identified for longer term housing needs associated with the Black Country.

5. Development Management Policies

5.1 Bloor Homes notes that this consultation document only outlines a general policy approach to non-strategic policies at this stage. Further considered comments can be provided once development policies are fully drafted.

5.2 Therefore, the following comments are intended to provide a helpful steer in drafting the proposed policies.

Question 11: Do you agree with the proposed policy approaches set out in Chapter 6?

5.3 Bloor Homes would wish to raise a general concern that the direction for travel for a number of policies relating to major residential schemes are overly prescriptive and have no regard to the context of a site within a wider settlement or any site constraints and opportunities. For example, the policy directions seek to prescribe a specific District wide density, detailed housing mix requiring at least 75% of proposed dwellings to be three bedrooms or less, and within this mix it is expected that properties will comply with NDSS, 30% will be required to meet M4(2) standard and potentially there will be a need to deliver an additional specific percentage as bungalows. In addition, the POS requirement requires all schemes of 33 dwellings or above to incorporate centrally located public open space where equipped play is provided as default. This prescriptive approach is in danger of stifling innovation, undermining high quality design and resulting in a large number of identikit housing proposals that lack and variety in housing provision or reflect/create local identity.

HC1 – Housing Mix

5.4 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.

5.5 Bloor Homes 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.

5.6 Bloor Homes would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 75% of properties to comprise three bedrooms or less and a further specific breakdown to be applied on a site-specific basis. This does not 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

- 5.7 Bloor Homes supports the efficient use of land, in accordance with National Planning Policy and Guidance, however, the introduction of a District-wide minimum density standard is not supported. Instead, it is necessary for sites to be considered on a site-by-site basis, having regard to the prevailing housing market conditions, local character, context and other planning policy requirements or environmental designations or constraints.
- 5.8 It should be noted that the housing mix requirements will influence density recognising that bungalow provision and adaptable and flexible housetypes will have greater land take.
- 5.9 In accordance with national guidance the Council may wish to consider a variety of density standards for different locations.
- 5.10 Nevertheless, due to the size of the site at The Straits and the lack of identified unmitigable constraints, it is realistic to expect the delivery of an efficient scheme that could achieve a minimum average net density of 35dph. However, this would be achieved through the provision of character areas of varying density and would be reflective of the character of surrounding development.

HC3 – Affordable Housing

- 5.11 Bloor Homes notes that for all major developments 30% of all homes are to be delivered as affordable housing. This appears to be supported by the Viability Study which determines the current affordable housing requirement of 40% affordable provision is very unlikely to prove supportable with increased infrastructure costs.
- 5.12 It is recognised that a Stage 2 Viability Assessment will be undertaken once more refined and bespoke assumptions regarding infrastructure and development costs are known. It is understood that the Infrastructure Delivery Plan will continue to be evolved and refined as the Local Plan review progresses.
- 5.13 Bloor Homes considers it is essential for affordable housing delivery targets to be tested alongside all other policy requirements and burdens to ensure that the total cumulative cost of all relevant policies do not undermine the deliverability of the Local Plan.

HC4 – Homes for Older People

- 5.14 The proposed direction of travel requires major residential development to make a clear contribution to meeting the needs of the District's ageing population. 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.
- 5.15 It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 30% 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.”

- 5.16 The Strategic Housing Market Assessment 2021 (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.
- 5.17 The HMA 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. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case.
- 5.18 The SHMA identifies a need for 1,793 accessible and adaptable general homes for those over 65 and 1,235 for those under 65 to 2038. This equates to less than 30% of the planned housing supply to 2038. Bloor Homes considers that whilst there may be justification for implementing optional M4(2) standards, the 30% requirement set out is excessive and not justified, especially where this could be in addition to other requirements set out for bungalow provision.

HC7 – Self & Custom Build Housing

- 5.19 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.

- 5.20 The SHMA identifies 15 applicants on the self-build register as of December 2019, recognising that 3 of these applicants are also on a register within another LPA. This demonstrates a very low level of demand. Additionally, the self-build register only needs to include the name and address of the lead contact and the number of serviced plots of land they are seeking to acquire- no information is requested on the financial resources. 'Demand' could be an expression of interest rather than actual demand.
- 5.21 The policy direction does not suggest a specific percentage of self and custom build homes will be required on allocated sites, instead 'encouraging' the provision of serviced plots for self-build and custom housebuilding as part of an appropriate mix of dwellings on all major developments. Bloor Homes considers this to be a proportionate response to the evidence that has been published.
- 5.22 If custom and self-build requirements are to be set out in policy, there needs to be a mechanism identified to allow for such plots to come forward for market housing if demand is not present. For example, if serviced plots for self-build and custom housebuilding have been made available and marketed for 12 months and have not sold, plots can be used for delivery of general market housing.
- 5.23 Practical difficulties of facilitating self and custom-build plots on larger sites should also be recognised, creating issues with health and safety and the need for independent construction access point.
- 5.24 In light of the above, if demand does increase, it would be preferable for small sites to be identified which are more suitable for self and custom build plots.

HC9 – Design Requirements

- 5.25 Bloor Homes 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.
- 5.26 Development management policies, which are intended to guide the determination of planning applications should be established through policy with requirements on design quality set out in sufficient detail without relying

on other criteria or guidelines set out in an SPD which has not been subject to examination.

HC11 – Space about Dwellings & Internal Space Standards

5.27 Bloor Homes has limited comment in respect of the space about dwellings standards currently utilised by the District Council which are generally considered appropriate.

5.28 However, if bungalows are to be provided within a scheme, it would seem logical to reduce 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. At present reduced garden requirements only relate to 1 bed specialist housing rather than single storey general housing in the adopted standards.

5.29 Bloor Homes wish to object to the internal floorspace policy direction.

5.30 The Nationally Described Space Standards (NDSS) were published by the Department of Communities and Local Government on 27 March 2015. Its publication was accompanied by a Planning Update issued as a Written Ministerial Statement to Parliament by the Rt. Hon. Sir Eric Pickles MP on 25th March 2015.

5.31 In introducing the standards, the Written Ministerial Statement outlines:

“New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes.”

5.32 However, the Written Ministerial Statement is also clear that the standards are optional, and that compliance cannot be required outside of a relevant current Local Plan policy:

“From 1 October 2015: Existing Local Plan, neighbourhood plan, and supplementary planning document policies relating to water efficiency, access and internal space should be interpreted by reference to the nearest equivalent new national technical standard.

Decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy."

- 5.33 This is to ensure that the need for the application of the standards through planning policy is fully evidenced and that the impact on viability is considered alongside all of the other policies contained in the Plan:

"The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance."

- 5.34 The reference to the National Planning Policy Framework relates to paragraph 130 which states planning policies should:

"create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users."

- 5.35 Footnote 49 makes it clear that use of the Government's optional technical standards should be used where this would address an identified need for such properties and the need for an internal space standard can be justified.

- 5.36 National Planning Guidance states:

"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.

timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”

- 5.37 The Guidance is therefore clear that the application of the NDSS requires a Local Plan policy which has been fully evidenced, including identification of need and the consideration of any impact on viability.
- 5.38 The South Staffordshire Housing Market Assessment provides limited commentary in respect of NDSS. The focus of this commentary, contained within the Accessible and Adaptable Housing section on page 90 relates to M4(2) and M4(3) standards and provides no justification for the requirement of NDSS on all new dwellings. It appears to imply that the NDSS is a national standard that should automatically apply. As set out above, this is incorrect. It also highlights that any requirements should be assessed to determine whether they are viable and should not impose any further requirements beyond building regs.
- 5.39 It is clear evidence does not currently support the imposition of the optional NDSS within South Staffordshire. To the contrary, the evidence highlights a number of potential risks if such a policy were to be introduced. The Council must provide adequate evidence of need if it is to require the application of NDSS in the Local Plan 2018-38.

HC12 - Parking Standards

- 5.40 Bloor Homes supports the existing parking standards contained within the Core Strategy.
- 5.41 In addition, Bloor Homes supports the requirement to provide electric vehicle charging infrastructure. The Council will need to review the need for a planning policy in relation to EV charging points given that this is due to be dealt with in the Building Regulations.

5.42 HC14 – Health Infrastructure

- 5.43 Bloor Homes recognises the need for development to address unacceptable impact on health infrastructure. It is recommended that engagement with the CCG informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

HC15 – Education

- 5.44 Bloor Homes supports the proposed direction of travel in respect of education infrastructure which appears to represent a continuation of the current approach. It should be recognised that Land at The Straits can accommodate a new primary school to support promoted growth in this location.
- 5.45 It is recommended that engagement with SCC Education informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

HC17 – Open Space

- 5.46 Bloor Homes notes the proposed direction of travel in respect of open space which proposes a reduced open space requirement of 0.006ha per dwelling compared to the existing standard of 0.01ha.
- 5.47 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. In addition, the requirement for open space to be centrally located may not be appropriate when considering on-site constraints and the location of existing open space in the vicinity.
- 5.48 It is recommended that distance isochrones are identified within the policy for different open space typologies such as LEAPs and LAPs to ensure open space infrastructure has regard to the needs of the wider settlement.

HC18 – Sports Facilities & Playing Pitches

- 5.49 Bloor Homes notes the Indoor Sports Facilities Strategy and Playing Pitch Assessment/Strategy that forms part of the evidence base for the emerging Local Plan.
- 5.50 It is recommended that engagement with Sport England and sports clubs/sporting bodies informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

HC19 – Wider Green Infrastructure Design Principles

- 5.51 Bloor Homes supports the provision of multi-functional greenspace as part of strategic developments.

EC3 – Inclusive Growth

5.52 The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential units is not supported by Bloor Homes.

5.53 Bloor Homes is committed to doing its part to help to resolve the well-documented national housing crisis, and in doing so recognises that addressing the construction skills shortage is of critical importance. Bloor Homes as a company has committed to the Home Building Skills Pledge, and in doing so have or are putting in place the following initiatives on a business wide basis:

- Relaunch and expansion of their unique apprenticeship scheme in 2014. They directly employ over 1002 apprentices at any one time on a 3-year programme, which represents around 15% of their workforce. The Bloor scheme is unique in that they directly employ at least two apprentice masters in each region (bricklaying and carpentry). The apprentice masters all have site and teaching experience, and are paid and incentivised solely to bring apprentices through the programme (i.e. they are not also expected to carry out work as a tradesmen alongside their mentoring roles).
- Ongoing trainee programme. Alongside the apprenticeship scheme, the trainee programme seeks to take in at least four trainees per region each year in the technical (architecture and engineering), surveying, sales and site management departments.

5.54 Whilst Bloor Homes recognises the importance of providing employment and skills initiatives that will impact on directly on the local areas in which they develop, the limitations arising as a result of the business model employed by Bloor Homes and all of the other major housebuilders should also be taken into account:

- All major housebuilders typically operate each site with a handful of directly employed staff (Site Manager, Assistant Site Manager, Labourer, Forklift Truck Driver etc) with all trades being sourced through subcontract businesses.
- Direct employees as a rule move from development to development as one site nears completion and the construction of others starts, rather than being recruited from the area local to the development.

- Management and back-office support teams are based in regional hubs – for example, the Midlands region has an office in Tamworth to cover an operating area stretching from Oakham to Shrewsbury on an east-west axis and from Nottingham to Stratford upon Avon on a north-south axis

5.55 As a result, it is unrealistic to expect students near a given development site looking for management and back-office work experience to travel to the regional office, which could be up to 50 miles away. In addition, due to the sub-contracting of the majority of the trades on any given site, such an ESP may not be able to provide any measurable evidence on local job creation or provide certainty in respect of inclusive growth.

NB2 – Biodiversity

5.56 The intention of Policy NB2 is recognised by Bloor Homes. However, Government policy and guidance are not yet requiring a 10% Biodiversity Net Gain, with the NPPF instead stating only that development should ‘provide net gains of biodiversity.’ Policy wording should instead seek biodiversity net gains in line with the Government’s latest legislation, policy or guidance. Bloor Homes is also aware that it is the Government’s intention to introduce exemptions applicable to the most constrained types of development which will be set out in secondary legislation and as such flexibility should be provided and a specific target, if included, should not relate to ‘all development.’

NB3 – Cannock Chase SAC

5.57 Bloor Homes notes further evidence in respect of Cannock Chase SAC, including a review of mitigation measures and visitor survey, is due to be published in 2022. This evidence should inform the policy approach to addressing any impact arising from development on Cannock Chase SAC and determine whether on-site mitigation will be effective in addressing such impact.

5.58 It should be noted that Land at The Straits falls outside the current Zone of Influence related to Cannock Chase SAC.

NB6 – Energy & Water Efficiency & Renewable Energy

5.59 Homes supports the direction of travel in respect of carbon reduction and consider that planning has an important role in the delivery of new renewable and low carbon energy infrastructure. However, policies should ensure that they follow nationally consistent set of standards/timetables and are implementable. Bloor Homes considers the success of achieving a low carbon

future is by standardisation rather than individual council's specifying their own policy approach to energy efficiency.

5.60 Changes to building regulations (Part L) to deliver the Government's 'Future Homes Standard' means that from mid-2022, new homes will have a 31% reduction in CO₂ when compared to current standards. Further changes are due in 2025 that will mean a 75% reduction in CO₂ when compared to today, along with a new focus on rating primary energy efficiency as well as CO₂.

5.61 Bloor Homes already applies a 'fabric first' approach in their house type design. The fabric first approach has a number of clear benefits, notably that it is built into the property for its whole life ensuring that every occupier will benefit from a reduced electricity bill and it reduces CO₂ emissions.

Question 12a: It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree that these are strategic policies?

5.62 Bloor Homes agrees that the policies outlined above represent strategic policies.

Question 12b: Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies?

5.63 Final drafted policy wording would be required to determine whether a policy is strategic.

6. Land at The Straits

- 6.1 This Chapter sets out a brief description of the site, followed by an assessment of the site against each of the Council's site selection criteria, as defined within the Housing Site Selection Topic Paper.
- 6.2 Bloor Homes control two areas of land at The Straits. The first is located to the north west of Sandyfields Road and to the south of Baggeridge Country Park (Site 560). The other site is located to the west of The Straits and to both the north and south of High Arcal Road, Dudley (Site 566). Site Location Plans for both parcels are included at **Appendix 1** to this representation. This representation is also accompanied by a Landscape, Visual and Green Belt Appraisal (**Appendix 2**) and an Illustrative Concept Plan (**Appendix 3**) which demonstrate how the sites may come forward as a comprehensive development.
- 6.3 A brief assessment of both parcels of land is included below, having regard to the Council's site selection methodology.

Site Description

Land North of Sandyfields Road (Site 560)

- 6.4 The site comprises approximately 18.2 ha of land, located to the north-west of Sandyfields Road and to the south of Baggeridge Country Park, Dudley. Whilst the site is located within South Staffordshire District, it shares a functional relationship with the Black Country conurbation.
- 6.5 The site is made up of a number of agricultural field parcels, accessed from Sandyfields Road. The parcels are subdivided by existing tree/hedgerow boundaries associated with the agricultural use of the land. The site is identified as Grade 3 (good to moderate) / Grade 4 (poor) quality agricultural land and therefore does not represent best and most versatile land (BMV).
- 6.6 Land at Sandyfields Road lies within the Green Belt but is adjacent to the current development boundary of Dudley. As such, development of the site would be subject to its release from the Green Belt. The site is located in Flood Zone 1, the area at least risk from flooding. The site is relatively flat, rising from the south-western corner upwards towards the north-eastern site boundary. The topography rises steeply beyond the north-western site boundary towards Baggeridge Country Park.

Land West of The Straits (Site 566)

- 6.7 The site comprises of land, located to the west of The Straits and to both the north and south of High Arcal Road, Dudley. Whilst the site is located within South Staffordshire District, it shares a functional relationship with the Black Country Conurbation.
- 6.8 The site is made up of a number of agricultural field parcels, accessed from High Arcal Road. The parcels are subdivided by existing tree/hedgerow boundaries associated with the agricultural use of the land.
- 6.9 The site lies within the Green Belt but is adjacent to the current development boundary of Dudley. As such, development of the site would be subject to its release from the Green Belt. The site is located in Flood Zone 1, the area at least risk from flooding. The site is relatively flat, rising from the southern boundary to the northern boundary.

Proposal

- 6.10 The residential-led proposal includes the following key features across both parcels:
- The delivery of approximately 600-650 new homes (approximately 750 including additional land to the south)
 - Access into the northern parcel would be achieved via two primary points of access and a third emergency access off Sandyfields Road. The central parcel would be accessed via a single access point off High Arcal Road and the southern parcel via two points of access off High Arcal Road;
 - The opportunity for the delivery of a primary school close to the existing settlement edge and primary access road to ensure accessibility;
 - A Green Infrastructure Strategy that incorporates open parkland providing an attractive setting to Himley Hall Registered Park and Garden and new linear parklands;
 - Provision of a new car park to serve Baggeridge Country Park; and
 - New equipped children's play areas.

Sustainability Appraisal (SA) Findings

- 6.11 The Council's Preferred Options Sustainability Appraisal (2021) provides an assessment of sites both pre and post mitigation and provides assessment of reasonable alternatives against the SA Objectives.
- 6.12 It is noted that the Sustainability Appraisal concludes Land North of Sandyfields Road (Site 560) is one of the highest scoring sites appraised against SA Objective 2 (Climate Change Adaption) and SA Objective 11 (Education).
- 6.13 The Housing Site Selection Topic Paper references the major positive impact against the criteria for Site 560 due to new residents' access to both primary and secondary education. The comprehensive proposal for The Straits provides opportunity for the provision of a new primary school and therefore a major positive impact should also be afforded to Site 566.
- 6.14 The Sustainability Appraisal notes the sites are of lower Green Belt harm than the majority of land in this broad location. Bloor Homes agrees with this conclusion.
- 6.15 The Sustainability Appraisal however concludes a higher landscape sensitivity for both sites compared with the majority of land in the broad location. This conclusion is contended by Bloor Homes who has commissioned a Landscape, Visual & Green Belt Appraisal (**Appendix 2**) to review landscape sensitivity. This appraisal determines a low-moderate sensitivity would be a more appropriate rating for both sites. This is discussed further below.

Sequential Test

- 6.16 The Council's spatial development strategy identifies an infrastructure led approach to growth. Bloor Homes agrees that additional growth is required in an area of search for urban extensions on the western edge of the Green Belt with the plan period and beyond and that non-Green Belt options available are insufficient to address housing need.
- 6.17 Green Belt release is justified and further allocations should be identified within the area of search along the western edge of the Black Country.

Green Belt Harm

- 6.18 The sites lie within the West Midlands Green Belt, adjacent to the current built up area of The Straits and within walking distance of its many facilities and bus links.

6.19 The Council's Green Belt Assessment (2019) indicates that should Green Belt to the east and west of High Arcal Road (Sub-Parcel ref: S71Bs2) be released for development, the resulting harm would be 'moderate-high', stating:

"The sub-parcel makes a strong contribution to preventing encroachment of the countryside and sprawl of the large built-up area. To the north of Himley Road, there is no separation between the sub-parcel and inset settlement at The Straits, and woodland provides strong containment from the wider countryside. This area could therefore be released without weakening the Green Belt boundary."

6.20 The Study goes on to identify that, should land to the north of Sandyfields Road (Green Belt Sub-Parcel ref: S71Cs2) be released for development, the resulting harm would be 'moderate-high', stating:

"The sub-parcel makes a strong contribution to preventing encroachment of the countryside and sprawl of the large built-up area. Adjacent to The Straits, woodland contains the southern end of the sub-parcel, so this area could be released with negligible impact on the Green Belt boundary or the integrity of the wider Green Belt."

6.21 Bloor Homes consider that the final conclusions in respect of these parcels, in relation to the potential harm that would arise from development are overstated given the assessment criteria and site analysis that is presented within the study. It is contended that a 'moderate' harm rating would be more accurate. Further justification of this conclusion is set out within the accompanying Landscape, Visual & Green Belt Appraisal attached as **Appendix 2**.

6.22 The South Staffordshire Green Belt Study concludes that the site is one of the least critical parts of the Green Belt on the edge of the Black Country Urban Area when assessed against the purposes set out in the NPPF. Indeed, whilst some harm would (inevitably) arise from the extension of the urban form into what is currently countryside, the site's relationship with the urban area, the presence of urbanising elements and the containment provided by the surrounding framework mean that the result harm would be minimised, certainly in comparison to other locations on the edge of the Black Country. Moreover, further mitigation can be provided through the carefully considered masterplanning of the site's development that will provide a logical form of development set within an integrated Green Infrastructure network.

6.23 The Council's own Green Belt Study and the site-specific appraisal appended to this representation demonstrate that the Green Belt harm of both sites are

lower than those that relate to the Council's preferred allocation on the western edge of the Black Country.

Landscape Harm

- 6.24 The South Staffordshire Landscape Sensitivity Assessment provides an update to previous landscape sensitivity assessments undertaken by the Council in 2015 and 2017. Land to the north of Sandyfield Road is assessed within a larger parcel extending northwards towards Penn Common (SL16) and land to the north and south of High Arcal Road is included within a smaller, stand-alone parcel (SL15).
- 6.25 The assessment for SL15 concludes that: *"The area has varied sensitivities relating to visual prominence and valued natural features and landscape pattern/time depth. Overall the area is considered to have moderate-high sensitivity to residential development as the majority of the criteria are moderate or high."*
- 6.26 Bloor Homes would contend that for the majority of criteria, SL15 is rated 'low-moderate', and there is no indication that explicit weighting has been given to any of the higher sensitivities. Therefore, a low-moderate sensitivity would be a more appropriate rating.
- 6.27 The assessment for SL16 concludes that: *"Despite the presence of some modern development and human influences, the landscape area is considered to have moderate - high overall sensitivity to residential development as it retains a small scale, scenic and historic rural character, including an intact mature hedgerow network, which all contribute positively as a backdrop to adjacent settlements."*
- 6.28 Bloor Homes contend, that whilst the site does include some of the features identified within the assessment, the ratings in the table show more of a weighting towards low-moderate; particularly when taking into account the site's position on the southernmost edge of the area and its distance from Sedgley and Gospel End.
- 6.29 Further consideration of the landscape and visual context for The Straits is set out in a Landscape, Visual & Green Belt Appraisal attached as **Appendix 2**.
- 6.30 The Illustrative Concept Masterplan, attached as **Appendix 3**, responds to the landscape and visual context through the incorporation of a number of features:

- A robust landscape buffer, incorporating native tree and shrub planting, SuDS and grassland softens views of the development edge and provides separation from Baggeridge Country Park and White's Wood.
- Linear parklands within the site intersect with retained hedgerow corridors as part of a strong green infrastructure network and incorporate the HSE inner and middle zones for the gas main and overhead powerlines.
- Existing hedgerows will be retained within the development where possible. As well as providing the basis for green corridor links across the development they will help to integrate the proposed development into the existing landscape.
- The school site will be located in the south west corner where it is easily accessible by the surrounding communities but also form part of an open space buffer alongside Miners Walk.
- Proposed development will be carefully arranged on the highest parts of the site to minimise visual impact. This may include the use of single storey properties to reduce the scale of development in some locations.
- Open space maintained as backdrop to localised view from the Toposcope in Baggeridge Country Park.
- Strengthen belts of tree planting along the site perimeter to strengthen the existing landscape structure and help to screen the development in views from the surrounding area.
- Access road orientated along the view to the chimney stack within Baggeridge Village when entering the site to the north off Sandyfields Road.
- East facing slope kept open to maintain sense of separation from edge of Sedgley and minimise harm to the Green Belt.
- An open parkland area provides an attractive setting to Himley Hall Registered Park and Garden. Strategically placed tree planting and roadside hedgerows will help to frame views and filter the proposed housing edge.
- Buildings arranged to present a more sympathetic frontage to the settlement edge in views from High Arcal Road.
- SuDS and open space provide a buffer between the development edge and the adjacent wildlife site.

Impact on the Historic Environment

- 6.31 The HESA sets out a RAG assessment for all sites against potential harm to the historic environment. It is noted that both sites are scored green for potential direct harm and amber for potential indirect harm.
- 6.32 There are no designated heritage assets within the sites, however it is recognised that land north of High Arcal Road abuts the boundary of the Grade II Registered Himley Hall Park and Garden. The Grade II* Listed Himley Hall is located approximately 1km west of the site.
- 6.33 The contribution of the proposal site to the setting of Himley Hall is considered to be negligible and has been diminished by the establishment of Himley Golf Course, which visually and materially divides the Hall from its historic farmland to the east, and the fact the historic eastern approach to the Hall is no longer extant. Moreover, there is no intervisibility between Himley Hall and the site.
- 6.34 Whilst land to the north and south of High Arcal Road once formed part of the wider agricultural landholding associated with the Registered Park and Garden, the legibility of this historic association has been eroded by the creation of Himley Golf Course and the mineral railway. The only intervisibility between the site and the Registered Park and Garden is limited to glimpsed views between the easternmost area of the Registered Park and Garden and the northern element of the site to the north of High Arcal Road. Overall, the site is considered to make a very small contribution to the heritage significance of the Registered Park and Garden.
- 6.35 In summary, the technical work undertaken to date concludes there are no heritage constraints identified that would preclude the development of the site.
- 6.36 The Illustrative Concept Masterplan, attached as **Appendix 3**, has been informed by the constraints and opportunities that this designated heritage asset presents and seeks to offer potential enhancement to the current landscape in which it is experienced.

Surface Water Flooding

- 6.37 The sites lie within Flood Zone 1 which has the lowest probability of flooding.
- 6.38 A Sustainable Drainage Strategy (SuDS) is proposed:
- To efficiently drain the site whilst not causing flooding downstream, including the school site;

- To create suitable habitats to promote biodiversity;
- To create ecological corridors across the site;
- To create an aesthetically pleasing setting for development; and
- To promote the site as a sustainable place to live and work.

Highways

- 6.39 The sites are well served by public transport and a number of local services and facilities are within a short walking and cycle distance or short public transport journey from the site. The site would therefore be well placed to ensure that future residents would have excellent sustainable access to a diverse range of services and facilities.
- 6.40 Access into the northern parcel would be achieved via two primary points of access and a third emergency access off Sandyfields Road. The central parcel would be accessed via a single access point off High Arcal Road and the southern parcel via two points of access off High Arcal Road.
- 6.41 A Public Right of Way (PRoW) passes along the northern boundary of the northern parcel providing access into Baggeridge Country Park. Development of the site provides the opportunity to form new pedestrian links within the site and enhance the existing footpath network.
- 6.42 As the sites are well related to the existing urban area all proposed connections will ensure new and existing services and facilities are accessible to all.
- 6.43 Bloor Homes notes the SCC Highways view that both sites are OK in principle subject to highway improvements.

Site-Specific Opportunities

- 6.44 As set out previously within this representation, the development of the site for residential purposes presents the opportunity to deliver a new Primary School.
- 6.45 A new car park to the country park is incorporated within the scheme, located along the development edge and benefiting from convenient access to the open space and footpath network and potential links to existing footpaths beyond the site to the north.

6.46 A number of linear parkland areas are proposed to form a strong green infrastructure network incorporating existing hedgerows and trees.

6.47 A variety of equipped children's play areas are incorporated within the green infrastructure network, promoting formal and informal recreational opportunities throughout the site.

Suitability

6.48 The information set out above, read in conjunction with the appended Illustrative Concept Masterplan and the Landscape, Visual & Green Belt Appraisal, demonstrates that land at The Straits is a suitable proposal.

Deliverability

6.49 There is an agreement in place between the landowner and Bloor Homes to facilitate the development of the site.

6.50 Bloor Homes intends to undertake further technical work to demonstrate the deliverability of land at The Straits, 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 2038. The site is available now.

6.51 The Bloor Homes is a national housebuilder with no funding or capacity constraints and the site is an area of high market demand. The site is deliverable and immediately available and, subject to allocation and removal of the land from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years.

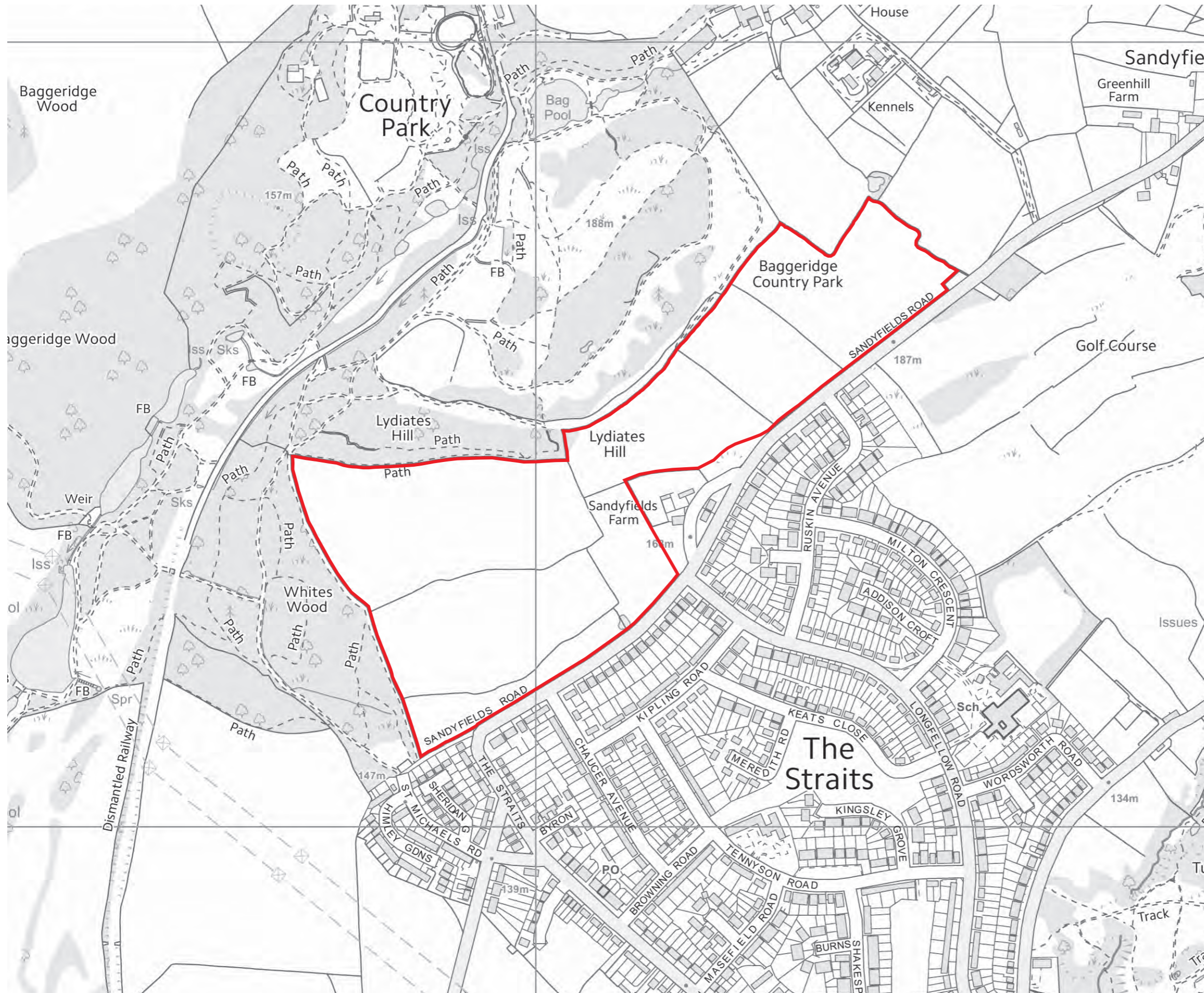
7. Conclusion


- 7.1 This representation is made by Evolve Planning on behalf of Bloor Homes to the South Staffordshire Local Plan Review, Preferred Options (Regulation 18) consultation. This representation relates to land at The Straits which is being promoted for residential-led development on the western edge of the Black Country conurbation.
- 7.2 Bloor Homes supports the Council's proposed spatial development strategy, which represents a refinement of Option G identified through the Strategic Housing Strategy and Infrastructure Delivery consultation published in 2019. Bloor Homes considers that this option not only assists in providing improved infrastructure but also has due regard to where housing needs exist, including within the top tier sustainable villages and locations close to the Black Country conurbation. Allowing growth in adjacent to the western edge of the Black Country provides an opportunity to meet locally arising housing needs and offers opportunity to support existing and deliver new services, facilities and infrastructure.
- 7.3 Further evidence should be provided in respect of the housing requirement to consider whether there is a need for additional housing to support likely jobs growth. In addition, Bloor Homes considers this Local Plan should be identifying further allocations within the area of search to the western edge of the Black Country and identifying safeguarded land to ensure permanence of the Green Belt well beyond the end of the plan period. Sites 560 and 566 should be considered in respect of both. At present the spatial development strategy fails to identify growth of between 500 and 2,500 dwellings to ensure consistency with the recommendations of the GBBCHMA Strategic Growth Study.
- 7.4 In addition, Bloor Homes has raised a number of concerns in respect of the direction of travel for a number of development management policies and considers it is essential for affordable housing delivery targets to be tested alongside all other policy requirements and burdens to ensure that the total cumulative cost of all relevant policies do not undermine the deliverability of the Local Plan.
- 7.5 The information contained within this representation, read in conjunction with the appended illustrative concept plan, demonstrates that land at The Straits is a suitable and deliverable site for residential development, subject to its release from the Green Belt.

- 7.6 There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the potential impacts of the development of the site can be mitigated through design and in many cases a positive outcome can be achieved.
- 7.7 It is therefore submitted that Land at The Straits should be removed from the Green Belt to assist in meeting local housing needs within the plan period or beyond.

APPENDIX 1

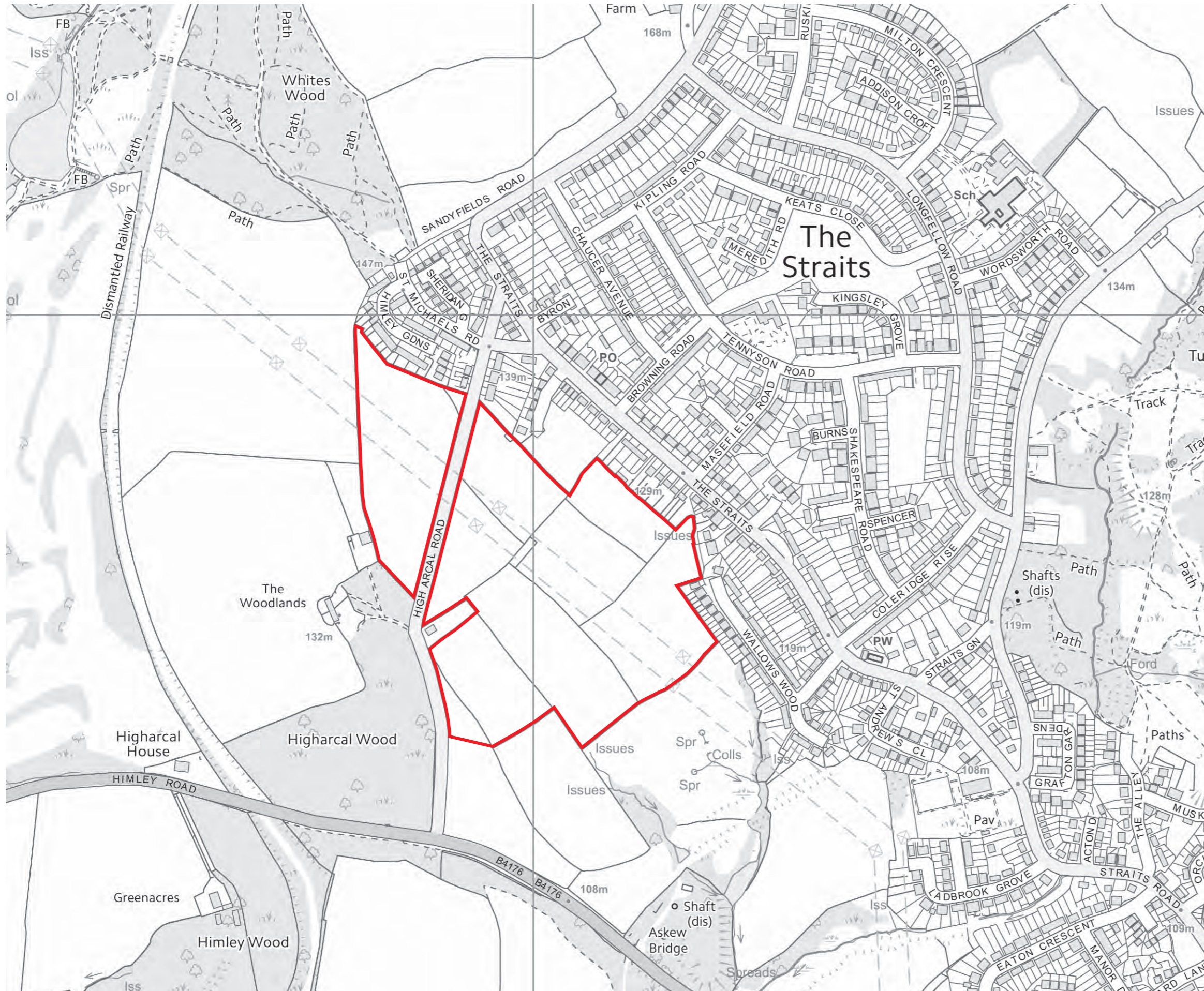
Site Location Plan



 SITE BOUNDARY
19.2 hectares



LAND NORTH OF SANDYFIELD ROAD, THE STRAITS | SITE LOCATION



SITE BOUNDARY
13.4 hectares



LAND WEST OF THE STRAITS | SITE LOCATION

APPENDIX 2

Landscape, Visual & Green Belt Appraisal

LAND AT
THE STRAITS
Dudley



LAND NORTH OF SANDYFIELDS ROAD & EAST/WEST OF HIGH ARCAL ROAD

Introduction

PURPOSE

This is a high-level landscape, visual and Green Belt appraisal for a residential development opportunity on land at The Straits (Land North of Sandyfields Road and East/West of High Arcal Road), which has informed an evolving Masterplan for the site. This will seek to highlight the merits of the land for potentially forming a key part of the spatial development strategy in the new South Staffordshire Local Plan.

THE SITE

The site is formed of three parcels of land: c.19ha to the north of Sandyfields Road (northern parcel), c.3ha to the west of High Arcal Road (central parcel) and c.10.5ha to the east of High Arcal Road (southern parcel), and comprises areas of grassland bisected by hedgerows. To the north, hedgerow corridors contain more trees and generally offer a greater degree of screening, whereas to the east they are largely managed hedgerows containing occasional trees; land to the west is a single paddock.

The northern parcel is bound to the south by a mature tree lined hedgerow on Sandyfields Road and a small cluster of dwellings forming a small crescent off Sandyfields Road. Beyond Sandyfields Road lies the residential suburb of The Straits and Sedgley Golf Club. The wooded Lydiates Hill and Baggeridge Country Park border the site to north and agricultural land extends beyond the site to the east. To the west the site boundary is defined by Whites Wood.

The central parcel is bound to the north by rear private gardens of residential development on Himley Gardens and the side boundary of the adjacent property on High Arcal Road. High Arcal Road defines the site boundary to the east and Higharcad Wood borders the site to the south. The boundary of Himley Hall Registered Park and Garden, denoted by a dilapidated wall, fencing and trees, defines the site boundary to the west.

The southern parcel is bound to the north by rear private gardens of residential development on The Straits, Majors Fold and Wallowswood, and the side boundary of the adjacent property on High Arcal Road. Further agricultural land and woodland lies beyond the site to the east and south, and High Arcal Road defines the site boundary to the west.

THE STRAITS

The Straits is a largely residential suburb to the west of Dudley and contains a number of local facilities, such as The Straits Primary School, Happy Hours Day Nursery, and a small local centre comprising a Post Office / newsagents, hairdressers, beauty salon and independent shops. It also benefits from a regular bus service to / from Dudley and Wolverhampton, passing through Lower Gornal, Gornal Wood, Sedgley, Goldthorn Park, and Blakenhall, where a wide range of local facilities and services are available.

Baggeridge Country Park, a 150 acre parkland to the north west of The Straits, and Cotwall End Local Nature Reserve, a Site of Importance for Nature Conservation (SINC) to the east of The Straits, provide extensive recreational opportunities within the locality, as well as an easily accessible network of public rights of way within the wider landscape. Baggeridge Craft and Enterprise Park, to the north of Baggeridge Country Park, also offers nearby employment opportunities.



Local Centre in The Straits



Chimney is a local landmark on the edge of Baggeridge Country Park



Housing development at The Straits

Figure One
THE SITE

LEGEND

 Site Boundary



Landscape & Visual Appraisal

LANDSCAPE CHARACTER

The site and surrounding area forms part of the 'Cannock Chase and Cankwood' Regional Character Area (RCA) as referred to in the Staffordshire County Council (SCC) "Planning for Landscape Change" SPG (adopted in 2001). The RCA is an extensive Character Area is characterised by carboniferous coal measures, overlain by glacial drift and stagnogley soils. It stretches northwards into central Staffordshire, with its north eastern and eastern boundaries sharply defined by the Trent and Tame Valley; the western boundary follows the River Penk and to the south merges with the West Midlands conurbation.

Within that RCA, the site is set within the 'Sandstone Hills and Heaths' Landscape Character Type (LCT) located on the eastern fringes of Staffordshire (to the west of Dudley). To the east of the site the landscape merges into the adjacent 'Sandstone Estatelands' LCT, that forms the southern boundary of the nearby village of Wombourne, as demonstrated by Figure 2.

Some of the distinctive features of the 'Sandstone Hills and Heaths' LCT of relevance to the site and study area include:

- Generally dispersed settlement pattern with expanded hamlets;
- Pastoral farmland characterised by an irregular, largely intact pattern of small-scale fields;
- Areas of intensive arable farming associated with gappy hedges with declining hedgerow trees;
- Undulating landform deeply cut by stream valleys resulting in views across to neighbouring landscapes;

- Continual removal of trees and hedgerows in the areas of intensive arable farming emphasises the strongly rounded landform;
- Urban influence is very great with built up areas visible and farm cottages improved;
- Small roads are all very well used, giving the impression of an area that is travelled through by large numbers of people.

The site and its immediate surroundings display many of the typical characteristics identified within the 'Sandstone Hills and Heaths' LCT. There is a mix of farmland types, with smaller more enclosed fields adjacent to the settlement edge giving way to larger arable fields further to the west and north west. Urbanising impacts are provided by the neighbouring residential edge to the south and east and the dispersed settlements of Gospel End, Himley and Wombourne are in the immediate surrounding area.

The site is also located within a Landscape Policy Zone for 'Landscape Maintenance', as shown on Figure 2. In these areas, the SPD states that '*substantial emphasis should be placed on ensuring that the development blends unobtrusively into the landscape and does not lead to the loss of features characteristic of it.*'

The character of the 'Sandstone Estatelands' LCT to the west marks a transition towards a more rural LCT that is present beyond the site and immediate surrounding area. This LCT is comprised of woodlands and parklands of traditional rural estates characterised by the more intact parts of the rolling lowland landscape. The landform here is gently undulating and this, coupled with the scarcity of hedgerow trees, results in wide expansive views through the landscape into the distance.

South Staffordshire Council have also produced a Design Guide SPD (2018) to help promote good design in new development. The general design principles identified within the Design Guide that relate to Landscape Character and are of relevance to the proposed site include;

- The siting and location of new major residential developments should take account of the characteristics and sensitivity of the landscape and its surrounding;
- Landscape and open space should be an integral part of the scheme's design, complementing and enhancing the development and the wider area;
- Establish what the character is through an appraisal of the site and its surrounding landscape or village;
- Safeguard and enhance the setting of valued features and protect and enhance landscape / village character; and
- Contributing to the surrounding character: creating links between natural areas, creating views to natural elements outside the development.



The recently published South Staffordshire Landscape Sensitivity Assessment (SSLSA0- July 2019) effectively updates the previous landscape sensitivity assessments undertaken in 2015 and 2017. It is intended to inform the Local Plan for South Staffordshire and notably the selection of development allocation sites.

Within the SSLSA, the northern part of the site is included within a larger area extending northwards towards Penn Common (SL16) and the southern part is included within a smaller, stand-alone parcel to the south (SL15). This is shown on Figure 3. Within the assessment,






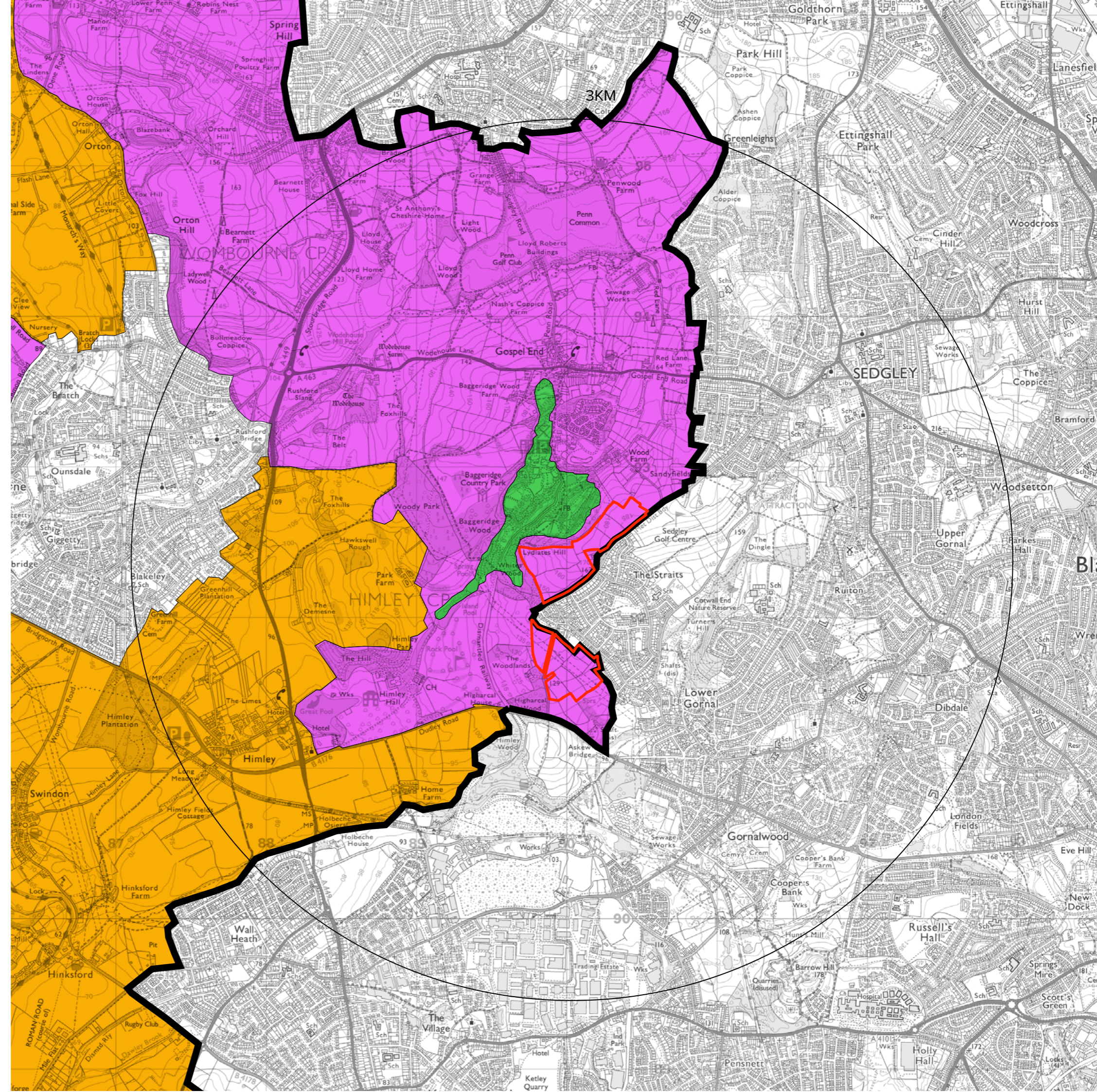
Figure Two
**LANDSCAPE
 CHARACTER CONTEXT**

LEGEND

-  Site Boundary
-  Authority Boundary

**STAFFORDSHIRE COUNTY COUNCIL
 'PLANNING FOR LANDSCAPE CHANGE' SPG
 (Adopted 2001)**

-  Sandstone Hills and Heaths
-  Sandstone Estatelands
-  Baggeridge Country Park (LNR)



it acknowledges that South Staffordshire areas located alongside the West Midlands conurbation often have a lower sensitivity to development than the rural villages within the district (due to the urbanising influences exerted by the proximity of the conurbation). However, it also suggests that the influence of the adjacent historic landscape at Himley Hall Registered Park and Garden may increase sensitivity to development in some areas (with SL15 and SL16 specifically referenced within the assessment).

The site is not subject to any designations other than Green Belt, and is not covered by any “absolute constraints” (those areas where the presence of known planning constraints mean development would not be permitted). While parts of the immediately surrounding area, including Himley Hall Registered Park and Garden, Baggeridge Country Park and Wallowswood Pastures SBI, do constitute “absolute constraints”, these lie outside the boundaries of the site.

The appraisal of each area’s landscape sensitivity to built development is summarised in the table below together with additional comments (where appropriate) in relation to the site’s specific role.

The assessment for SL15 concludes that: “The area has varied sensitivities relating to visual prominence and valued natural features and landscape pattern/time depth. Overall the area is considered to have moderate-high sensitivity to residential development as the majority of the criteria are moderate or high.”

However, the ratings (as shown in the table) show that the majority of criteria are low-moderate, and there is no indication that explicit weighting has been given to any of the higher sensitivities. Therefore a low-moderate sensitivity would be a more appropriate rating.

The assessment for SL16 concludes that: “Despite the presence of some modern development and human influences, the landscape area is considered to have moderate - high overall sensitivity to residential development as it retains a small scale, scenic and historic rural character, including an intact mature hedgerow network, which all contribute positively as a backdrop to adjacent settlements.”

While the site does include some of the features identified within the assessment, the ratings in the table show more of a weighting towards low-moderate; particularly when taking into account the site’s position on the southernmost edge of the area and its distance from Sedgley and Gospel End.

Overall, a rating of Moderate-Low sensitivity is considered to be appropriate for both parts of the site (within SL15 and SL16) rather than the Moderate-High attributed within the assessment.

In considering whether the site forms part of a ‘Valued Landscape’, Box 5.1 of the “Guidelines for Landscape and Visual Impact Assessment” (3rd Edition) sets out the range of factors that can help in the identification of valued landscapes. The site mainly comprises of a number of grass paddocks on the edge of an existing settlement,

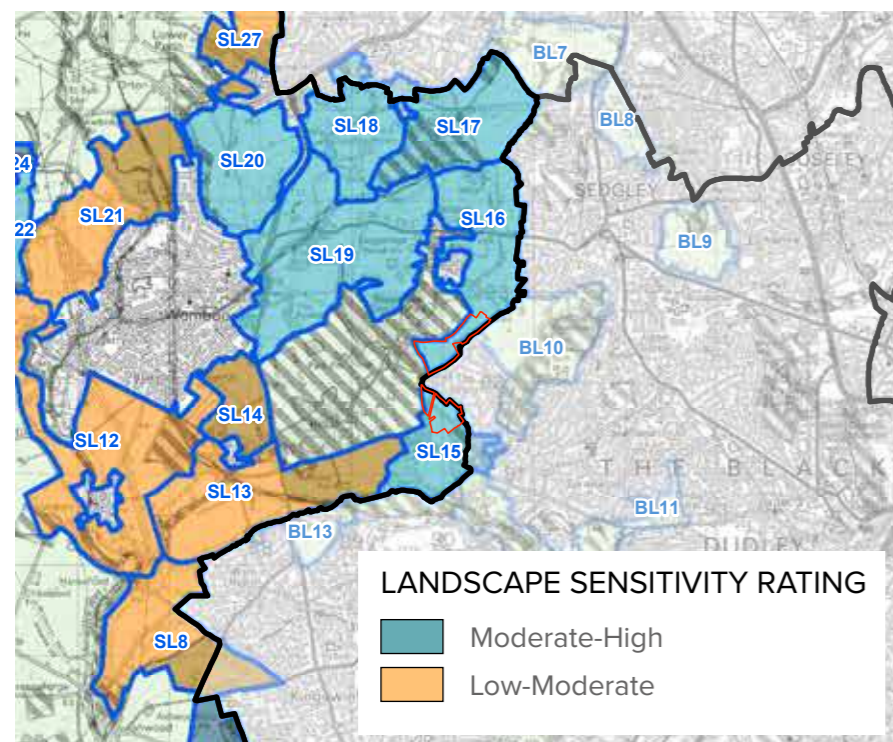
subdivided by mature trees and hedgerows. This is typical of the surrounding area and is considered to be of high quality (reflected by the Landscape Policy Objective in the SPG of “Landscape Maintenance”). It has limited scenic qualities and there are no known cultural associations, although it is adjacent to a Registered Park and Garden and a former colliery site (now a Country Park). Although it forms part of the setting of the Country Park and includes a number of mature trees and hedgerow boundaries, there is nothing within the site that elevates it enough to be considered a ‘valued’ landscape (as set out in paragraph 170(a) of the NPPF) and the site is not subject to any specific landscape designations.

In summary, residential development on the site would constitute moderate development on the edge of the existing conurbation, extending north and west, but would be contained by the surrounding land-uses, including woodland, the Himley Estate, the B4176 and Baggeridge Country Park. While the existing landscape structure is generally considered to be of high quality and is typical of the wider surrounding landscape character, there is an opportunity to retain many of the mature hedgerows and trees within the site to help integrate the proposed development and the existing settlement edge into the surrounding landscape.

The key landscape features of the site and immediately surrounding area are shown on Figure Four.

Figure Three & Table 1

THE STRAITS LCP SENSITIVITY



























Plan extracted from Landscape Sensitivity Study Update (2017) published by South Staffordshire Council (SSC).

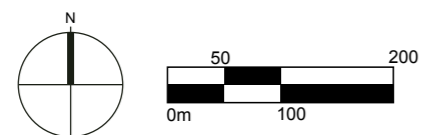
Characteristic/Attribute	SL15 Sensitivity*			Comments (where applicable)	SL16 Sensitivity*			Comments (where applicable)
	Lower	Moderate	Higher		Lower	Moderate	Higher	
Scale	o							
Landform								
Landscape pattern & time depth	o			Post medieval associations with the site.				
Natural character				Emphasis is on designated areas and woodlands near to the site. Site includes mature hedgerows and hedgerow trees.			o	
Built Character								
Recreational Character						o		
Perceptual Aspects								
Settlement Setting							o	The site only plays a minor part in the wider setting of Sedgley and Gospel End and the perceived gap between them.
Visual prominence				Although the site is on higher ground (and more visually prominent) so is the adjacent settlement edge.				
Inter-visibility with adjacent designated landscapes or promoted viewpoints								The assessment does not consider views from Baggeridge Country Park (or from the Toposcope within the Park).
Total Scores	5	4	3		4	4	2	

*Sensitivity ratings taken from assessment. Ratings applying to specific features within the areas (and therefore not the site) have been excluded (such as those within SL15 relating to the former mineral working site south of Himley Road). Where a rating has been excluded it has been marked with a circle for reference.

Figure Four
SITE CONTEXT

LEGEND

-  Site boundary
-  Existing vegetation
-  Notable woodland
-  Himley Hall Registered Park & Garden
-  Ancient Woodland
-  BAP Priority Habitat
-  Key local facility
-  Watercourse/body
-  Main road
-  Secondary road
-  Other road
-  Bridleway
-  Public footpath
-  Informal path
-  Nearby bus stop
-  Local landmark
-  2m contour
-  Viewing area
-  Key view
-  Filtered view
-  Tipton Auto / Haglay Gas Main & HSE zones
-  Gospel End / Dawley Gas Main & HSE zones
-  Sub station
-  Overhead powerline



VISUAL AMENITY

The visual amenity of the site and its surroundings has been appraised through the preparation of a Zone of Theoretical Visibility (ZTV) and a consideration of key views (as presented on the following pages).

The ZTV considers the screening provided by the area's underlying topography. On this basis, the lighter areas represent locations where there may be a potential view of the site and the darker areas represent those areas where there may not. It shows that potential views of the site are likely to be mainly from the south and south west and immediately to the east, with intermittent coverage from the surrounding areas to the north and west (within 1.5km of the site) and limited coverage to the east (beyond 2km). However, fieldwork has shown that views from many of the locations to the north and west are limited by vegetation, particularly the trees and woodland surrounding Baggeridge Country Park and the Himley Estate, while many of the areas to the south and east are already populated by suburban housing areas which limit available views.

An appraisal of key views from public vantage points in the wider area, in particular those from the Country Park and nearby public rights of way, has been undertaken. Those selected are shown on the ZTV and are set out on the following pages. They look at the potential impact on views from:

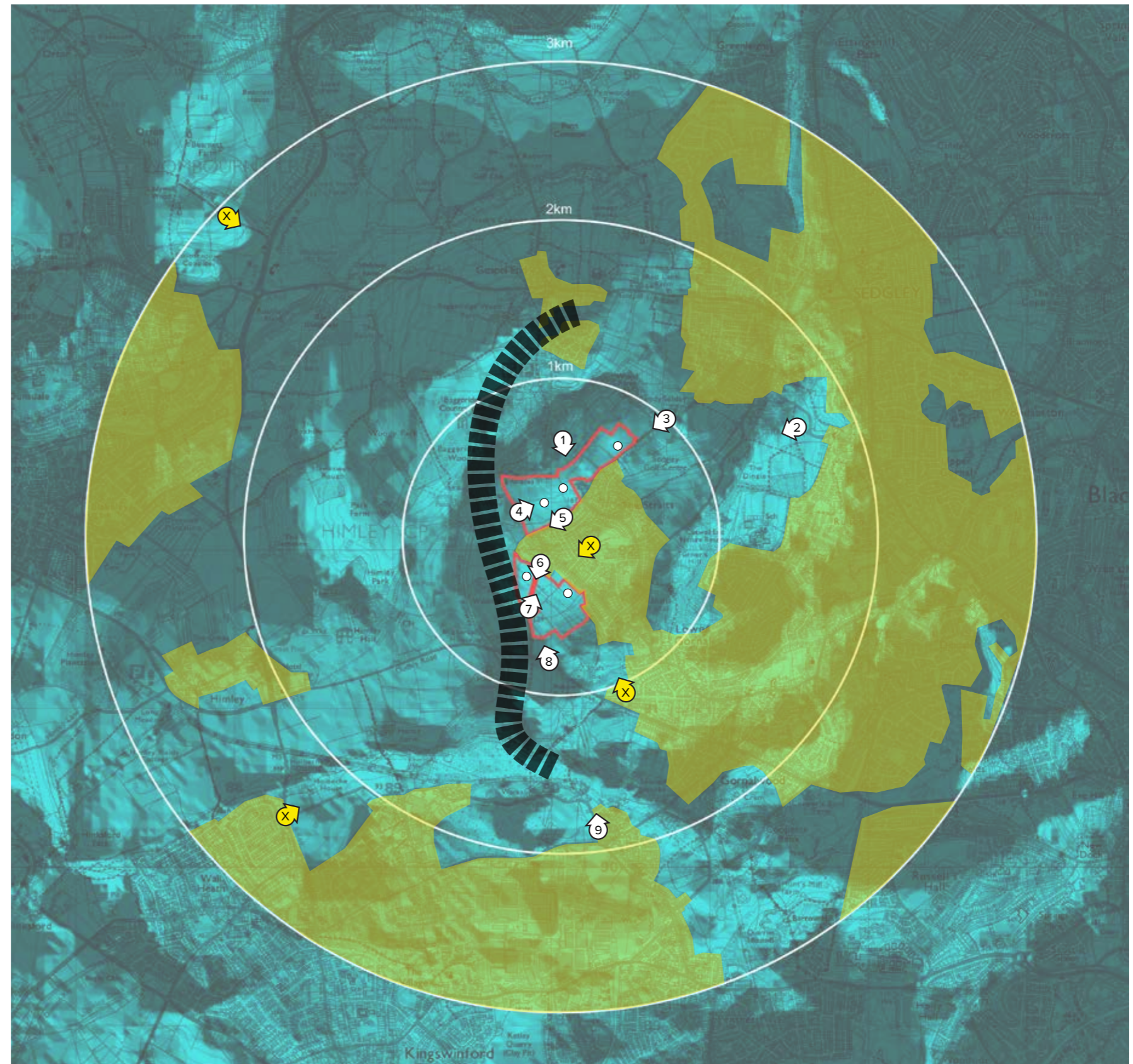
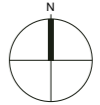
- key approaches into the housing area - from the north (on Sandyfields Road), from the south (on Himley Road / High Arcal Road) and from the east (within the Straits);
- public viewpoints within the Country Park and Miners Walk - a public footpath connecting the Country Park to The Straits;
- public rights of way to the east;
- the surrounding residential roads; and
- the rising ground to the south.

Development is inevitably going to be visible within its immediate context, particularly from the adjacent settlement edge and from the roads and public rights of way within, or immediately adjacent to the site (including the Country Park). However, this development would generally be well contained by the surrounding settlement edge and by trees and vegetation, and have limited visibility within the wider landscape setting. Where views exist from higher ground to the south, development is likely to be seen in the context of the existing settlement edge and would not be a major detractor within the view.

Although views from the adjacent Country Park are often restricted by earth mounding and tree cover around the perimeter of the park, the most northern parcels of the site can be seen in views from the Toposcope and there are also glimpses into the northern section of the site from an elevated wooded footpath running along the southern boundary.

Figure Five

ZONE OF THEORETICAL VISIBILITY (ZTV) - WITH VIEWPOINTS



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LEGEND

Site Boundary
Light Source

Viewpoint

Viewpoint visited but no view of the site due to screening by offsite buildings or vegetation.

Built up area within 3km where views are further restricted by built form.

Broad belt of tree cover and woodland which combine to screen the majority of views from the west.

Most Visible Least Visible

Views

Looking south



Looking north



VP1: From the toposcope within Baggeridge Country Park. The view is from a localised viewpoint within the Country Park, where a raised pit mound allows a 360° panorama over the surrounding parkland. It is marked by a toposcope and is reached by a marked trail that is identified on visitor information for the park. Prominent landmarks include the church spire in Sedgley and the brick works chimney, while new housing development on the northern edge is also highly visible. The Straits is screened by landform and tree planting around the southern edges of the site, and this also restricts many longer distance views towards the south. The Country Park is a former colliery site and part of the Himley Estate and offers a range of facilities for recreation and wildlife interest. While the position of the toposcope increases the expectation and level of interest in the view, the setting is already influenced by the surrounding settlement edge, particularly Sedgley to the north east and the new housing development to the north. While the majority of the site is screened from view, the open fields in the north east corner would be visible, extending towards the viewpoint on a north facing crest of land above the surrounding perimeter vegetation.



VP2: View from PROW to the east. The view is from a boggy public footpath crossing horse enclosure on the edge of Sedgley. Surrounding landform and vegetation provides a sense of enclosure with some long distance views to the south west where gaps in the tree cover allow. Housing is generally absent within the view, save for a few glimpsed areas on the edge of Kingswinford and a few properties on the edge of The Straits. However, there is a strong sense of overlooking provided by the adjacent housing on the edge of Ruiton, which sits amongst trees on elevated ground to the east. There are a number of public footpath routes crossing the area, allowing recreational access over the paddocks and surrounding fields towards Cotwall End Nature Reserve. However at the time of assessment many of these connecting routes were waterlogged and impassable. Although the view is from a public right of way there is no indication that views from this location are recognised as being of any particular additional importance.



VP3: View from Sandyfields Road on the approach from the east. The view is from the main road into the Straits from Sedgley to the east. Although mainly experienced by transient receptors in passing vehicles it is also close to a bus stop and private residences where receptors would be more stationary. It is taken from a position on the edge of Sedgley where the housing enclosure starts to break down and there is a sense of leaving the settlement as views open out across to Baggeridge Country Park in the west, where the chimney stack is a prominent landmark. This is the main point of interest as most wider views are curtailed by the surrounding topography and vegetation cover - although there are some glimpsed distant views beyond the Country Park where gaps in the surrounding trees allow. The majority of the site is screened from view by the bend in the road and the roadside enclosure, although the north eastern corner can be seen through the hedgerow trees where the field slopes gently eastwards towards the viewpoint. The Straits is also screened from view. Although new development at Baggeridge Village can be seen within the view, it appears quite isolated and separate from the settlement edge. The view is not known to have any particular additional value to elevate its importance.

Approach to Miners Walk from within Country Park



Approach to Miners Walk from The Straits



VP4: View from Miners Walk. The view is from an attractive tree lined footpath running along the western edge of the northern section of the site. It is a public right of way which links The Straits to Baggeridge Country Park. Along its western edge is Whites Wood, within the Country Park, with informal trails snaking away through the understorey. Along the eastern edge there are views into the open grassed fields on the site through the boundary vegetation. The rising ground and hedgerow partitions curtail longer views across the site, and screen housing within The Straits from view. Lydiates Hill and woodland planting along the edge of the Country Park provide enclosure to the north. The open fields provide a contrast with the wooded enclosure and separate the housing edge from the Country Park. Most receptors will be leisure walkers and local residents accessing the Country Park from The Straits and although it is a public footpath it is not known to have any particular additional value that would elevate the importance of views taken from it.



VP5: From Sandyfields Road on the edge of The Straits. The view is from a public road skirting the northern edge of the housing area. There are few views into the land to the north (which forms the northern section of the site) due to the robust roadside hedgerows. Housing along the southern edge is mainly detached bungalows or 2 storey semi-detached. There is a sense of being elevated and gaps in the frontage for side roads occasionally allow longer distance views out to the south and west, although these are mainly characterised by further estate housing. The main receptors will be transient, travelling along the road, or residents of overlooking properties. View from this location are not understood to be recognised as being of any particular additional importance.



VP6: From High Arcal Road, at junction with St Michaels Road. The view is from a residential road junction within the Straits. It has a strong suburban estate character. There are narrow linear views towards the site, with parts of the open fields flanking the road and the pylons visible along High Arcal Road. However, surrounding properties and vegetation screen the majority of the site from view. Longer distance views are curtailed by woodland on the western edge of the site. Views would mainly be experienced by transient receptors passing through the area and by local residents moving between the Country Park and the housing estate. The view is from a public road but there is no indication that views from this location are recognised as being of particular importance.



VP7: View from High Arcal Road on the edge of the site. The view is from a narrow public road on the approach to The Straits, where the carriageway straightens after a bend in the road and emerges from an enclosed stretch between a woodland and a traditional stone cottage. The rising ground allows an open vista towards the existing settlement edge, typified by 2 storey brick houses backing on to the adjacent fields. Although softened in places by planting it generally presents an abrupt linear edge to the developed area. Swathes of housing can also be seen climbing the hills beyond and extending southwards towards Dudley, where high rise development can be seen on the horizon. Pylons and powerlines are also prominent within the view, extending across the open field corridor. Although rising ground to the north of High Arcal Road is particularly prominent, visibility of the land to the south diminishes with distance as vegetated field boundaries start to screen and enclose individual land parcels. The main receptors will be transient, travelling towards the settlement in vehicles, and there are no associated footpaths for pedestrians. There is no indication that views from this location are recognised as being of any particular additional importance.



VP8: View from Himley Road, the B4176. The view is from a busy public road running along the south western edge of the site. This stretch of road is generally enclosed by vegetation along both sides although the view is taken at a point where the lack of roadside tree planting gives a greater sense of openness. However, the layered screening provided by vegetation within the nearby field boundaries curtail any wider views across towards the nearby housing edge and effectively screen the site from view. There are occasional glimpses of pylons above the surrounding vegetation although they do not dominate within the view. Although there is a narrow footway on the northern edge of the carriageway, the main receptors will be transient, travelling along the road in vehicles, and have a relatively short exposure to the view. There is no indication that views from this location are recognised as being of any particular additional importance.



VP9: View from Oak Lane on the edge of the Pensnett Estate. The view is from a public road off a roundabout on Stalling's Lane. It currently gives access to a number of commercial operations - which are prominent in the views foreground. The north facing slope allows views across to the rising ground around Lydiates Hill and The Straits, with the open ground forming the southern sections of the site being visible in front of the existing housing edge and the northern section of the site visible on the skyline beyond. However, any proposed development would be seen within the context of the existing settlement edge within a view that it already heavily characterised by nearby commercial and residential development and infrastructure. The view is taken from a public road where the majority of receptors are likely to be transient and only have fleeting interest in the backdrop. There is no indication that views from this location are recognised as being of any particular additional importance.

Green Belt

INTRODUCTION

There are two assessments looking at the function of the Green Belt in South Staffordshire. The Greater Birmingham HMA Strategic Growth Study (February 2018) includes a high level Green Belt Review, while the South Staffordshire Green Belt Study (July 2019) provides an assessment of specific land parcels within the District.

STRATEGIC GROWTH STRATEGY

The Strategic Growth Study (SGS) analyses “the form and strategic function of the Green Belt against the purposes of Green Belt policy set out in the NPPF” (para 8.5) in order to inform its assessment of the options for strategic scale growth within the study area.

The site is located within area W8. As for much of the Green Belt at the edge of the Black Country, the southern parcels are identified as forming part of a wide area that has a principal role in containing urban sprawl and maintaining separation. The northern parcel forms part of an area identified as having a supporting role in those respects.

SOUTH STAFFORDSHIRE GREEN BELT STUDY

The South Staffordshire Green Belt Study (July 2019) comprises a two stage study:

- Stage 1 considers the contribution of Green Belt in the District to the Green Belt purposes as defined in the NPPF;

- Stage 2 provides a more focused assessment of the potential ‘harm’ of removing specific areas from the Green Belt.

Stage 1

The site is located within Stage 1 Green Belt Area S71. This is one of the largest areas (at 749.3 hectares) assessed in the study, and therefore, the conclusions are somewhat generalised:

Purpose 1 Checking unrestricted sprawl: Strong. However, that same conclusion is reached for all of the Green Belt on the edge of the Black Country urban area.

Purpose 2 Preventing merging towns: Weak / No contribution. This purpose is not, therefore, considered further in Stage 2 of the study.

Purpose 3 Safeguarding countryside from encroachment: Strong. However, as paragraph 5.25 notes, “the vast majority of land in South Staffordshire makes a strong contribution to preventing encroachment on the countryside”.

Purpose 4 Preserving setting and special character of historic towns: Weak / No contribution. This purpose is not, therefore, considered further in Stage 2 of the study.

Purpose 5 Assist urban regeneration, by encouraging recycling of derelict and other urban land: Strong. This is, however, a consistent generalised conclusion for all of the Green Belt within the District and it is not, therefore, considered further in Stage 2 of the Study.

Stage 2

Stage 2 seeks to present finer grain of assessment that in order to allow the potential harm to the Green Belt that may arise from specific development opportunities to be considered on a consistent and relative basis.

The southern parcels of the site are assessed as part of Parcel S71B, and then specifically as S71Bs2 ‘Release of land to the north of Himley Road adjacent to the Straits, or between Himley and the B4176 Dudley Road’. The northern parcel is then assessed as part of Parcel S71C, and then specifically as S71Cs2 ‘Release of land to the west of the Straits’.

The study concludes that the release of the southern parcel of the site (S71Bs2) would result in moderate-high harm. The supporting text (Page 744 – Appendix 2) states that “the sub-parcel makes a strong contribution to preventing encroachment of the countryside and sprawl of the large built-up area. To the north of Himley Road, there is no separation between the sub-parcel and inset settlement at The Straits, and woodland provides strong containment from the wider countryside. This area could therefore be released without weakening the Green Belt boundary.”

The study concludes that the release of the northern parcel of the site (S71Cs2) would result in moderate-high harm. The supporting text (Page 747 – Appendix 2) states that “adjacent to The Straits, woodland

contains the southern end of the sub-parcel, so this area could be released with negligible impact on the Green Belt boundary or the integrity of the wider Green Belt.”

It is apparent from the collated conclusions of the Stage 2 Study set out in Figure 7.2a of the Study (reproduced opposite), that the site is one of the least critical parts of the Green Belt on urban edge of the Black Country.

Notwithstanding that, however, it is considered that the final conclusions in relation to the potential harm that would arise from the development of the site itself are overstated given the assessment criteria and site analysis that is presented in the study (as set out above).

Indeed, it is apparent that the land parcels within the site all have a strong relationship with the existing urban area. It is clearly an urban fringe location affected by urbanising features that reduce the visual openness and connections into the urban area. It also benefits from a visual and perceived separation from the wider Green Belt provided by the robust landscape framework, notably the woodland, in the surrounding area.

On that basis, and applying the criteria set out in Tables 4.2 and 4.4 of the Study, it is contended that the site makes a moderate contribution to both Purpose 1: check the unrestricted urban sprawl of large built-up areas and Purpose 3: assist in safeguarding the countryside from encroachment.

Whilst it is inevitable that some harm would arise from the extension of the urban form into what is currently countryside, the site’s relationship with the urban area, and the separation from the surrounding area provided by the surrounding framework mean that the resultant harm would be minimised. Indeed, in light of the considerations set out in Section 6 of the study, it is apparent that the robust landscape framework would effectively contain the development on the site minimising the impact on the function of the residual Green Belt. It would provide a clear defensible boundary to a revised Green Belt area and retain a clear distinction between town and countryside.

Therefore, when applying the “guidelines” set out in Figure 6.1 of the study, in light of the contribution the site makes to Green Belt purposes and the implications its release would have for the residual Green Belt, it is apparent that a Moderate harm rating would be more accurate.

Moreover, it is critical that the further mitigation that can be provided through the carefully considered masterplanning of the site's development that is taken into account. That will provide a logical form of development that is well related to the existing urban area and set within an integrated Green Infrastructure network that links to the surrounding area.

Notably, a small area at the north eastern extent of the site is considered within the wider S71Cs1 area that extends northwards. The study concludes that its release for development would result in very high harm to the Green Belt. However, as highlighted in the scheme mitigation set out in the following section, this area can be retained as public open space forming part of that proposed Green Infrastructure network.

LEGEND














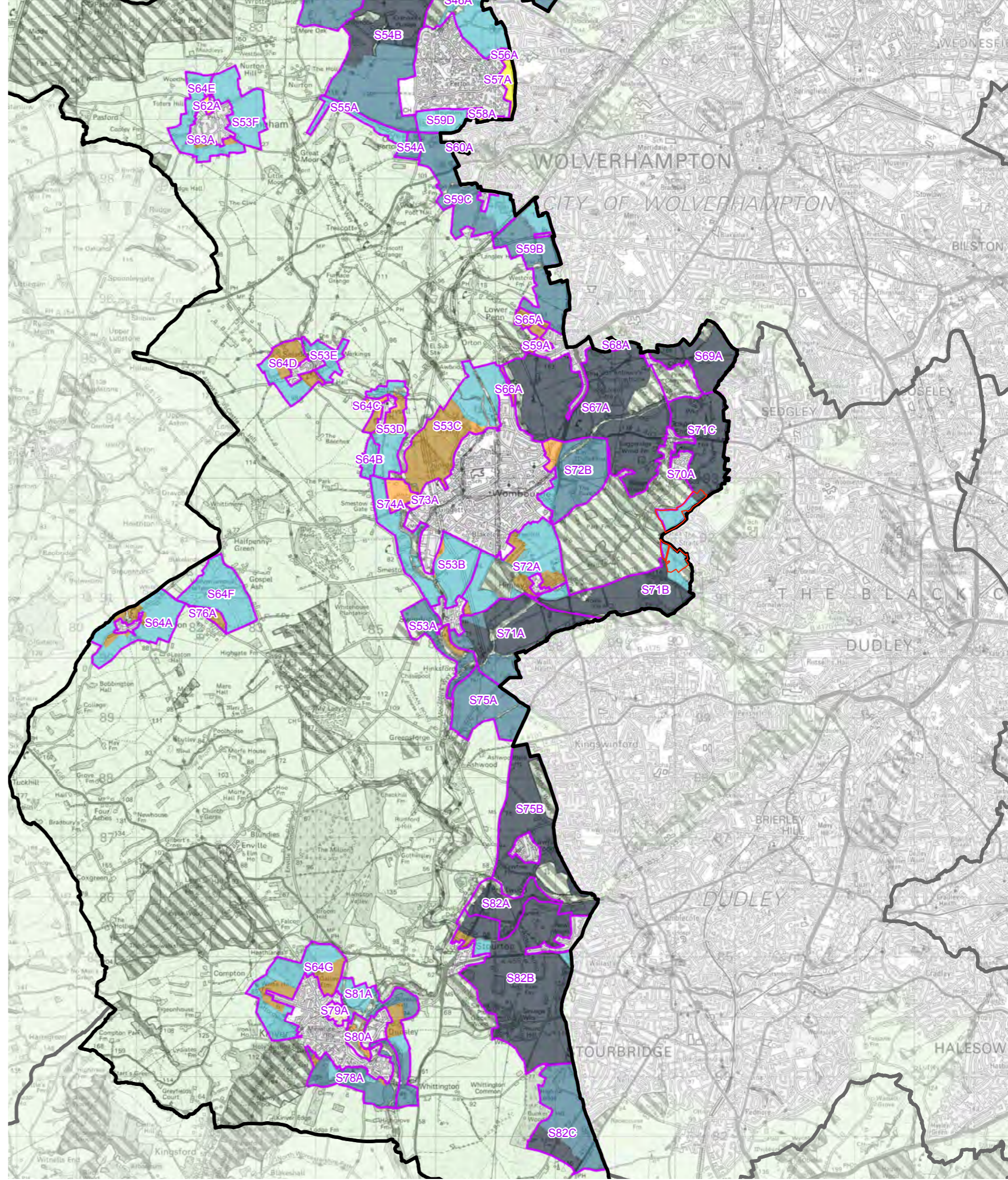
-  Site Boundary
-  South Staffordshire (South)
-  Other Local Authority
-  Green Belt
-  Absolute constraints
-  Stage 2 sub-parcel
- Harm rating**
-  Very High
-  High
-  Moderate - High
-  Moderate
-  Low - Moderate
-  Low
-  Very Low

Figure Six
THE SITE WITHIN THE GREEN BELT
 (Plan extracted from the Staffordshire Green Belt Study - Figure 7.3b)



Summary & Conclusions

In considering the site within its landscape and visual context the following key issues have been identified:

LANDSCAPE

- The site is broadly characteristic of the Landscape Character Type in which it is located. Key characteristics include the pastoral farmland, the irregular, largely intact pattern of small-scale fields, the undulating landform deeply cut by stream valleys and the resulting views across to neighbouring landscapes.
- Urbanising impacts are provided by the highly visible neighbouring housing edge, improved farm cottages and overhead powerlines and pylons.
- The landscape policy objective for the Landscape Character Type is “Landscape Maintenance”. In these areas, the landscape quality is considered to be high and an emphasis is placed on development blending unobtrusively into the landscape while ensuring that it does not lead to the loss of characteristic features.
- Himley Estate, a Registered Park and Garden, is located to the west of the site.
- Baggeridge Country Park is a recreational resource to the north of the site. The brick kiln chimney is a prominent landmark locally.
- There are not considered to be any features on the site that elevate it to being a ‘valued’ landscape as set out within paragraph 170(a) of the NPPF.
- It is not covered by any specific landscape designations.
- There are no public rights of way within the site, although Miners Walk is a public right of way running along the north western boundary and links The Straits with Baggeridge Country Park.

Although development on the site would lead to a change to the landscape in this area, with the loss of a number of fields on the edge of the existing conurbation, many of the notable landscape features will be retained within the Masterplan, including the existing mature hedgerows and trees. This will provide scope for the proposed housing development to be successfully integrated into the surrounding settlement edge. Existing infrastructure corridors, including powerlines and a high pressure gas line will be incorporated within the Masterplan as linear parkland.

VISUAL

- A ZTV for the site, supported by subsequent fieldwork, shows that potential views of the site are likely to be mainly from the south and south west and immediately to the east, with intermittent coverage from the surrounding areas to the north and west (within 1.5km of

the site) and limited coverage to the east (beyond 2km).

- Fieldwork has shown that views from many of the locations to the north and west are limited by vegetation, particularly the trees and woodland surrounding Baggeridge Country Park and the Himley Estate, while many of the areas to the south and east are already populated by suburban housing areas which limit available views.
- A number of key views were identified and appraised. These look at the potential impact on views from key approaches into the housing area from the north (on Sandyfields Road), from the south (on Himley Road / High Arcal Road) and from the east (within the Straits), from public viewpoints within the Country Park, from Miners Walk, from public rights of way to the east, from the surrounding residential roads and from the rising ground to the south.

Although development is inevitably going to be visible within its immediate context, particularly from the adjacent settlement edge and from the roads and public rights of way within, or immediately adjacent to the site (including the Country Park), it would generally be well contained by the surrounding settlement edge, trees and vegetation, and would have limited visibility within the wider landscape setting. Where views exist from higher ground to the south, development is likely to be seen in the context of the existing settlement edge and would not be a major detractor within the view.

GREEN BELT

The South Staffordshire Green Belt Study concludes that the site is one of the least critical parts of the Green Belt on the edge of the Black Country Urban Area when assessed against the purposes set out in the NPPF. Indeed, whilst some harm would (inevitably) arise from the extension of the urban form into what is currently countryside, the site’s relationship with the urban area, the presence of urbanising elements and the containment provided by the surrounding framework mean that the result harm would be minimised, certainly in comparison to other locations on the edge of the Black Country. Moreover, further mitigation can be provided through the carefully considered masterplanning of the site’s development that will provide a logical form of development set within an integrated Green Infrastructure network.




























PROPOSED MITIGATION MEASURES

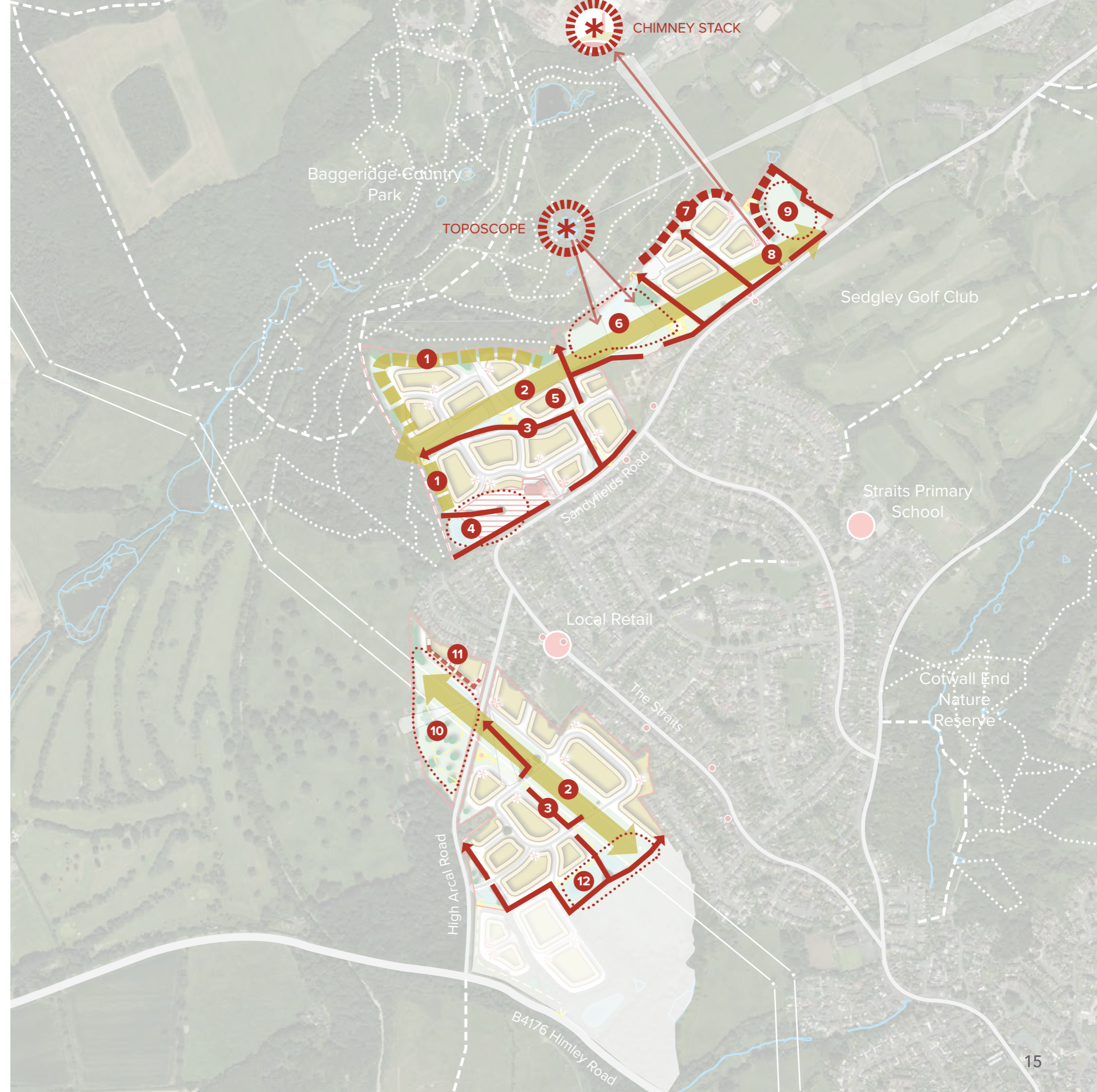
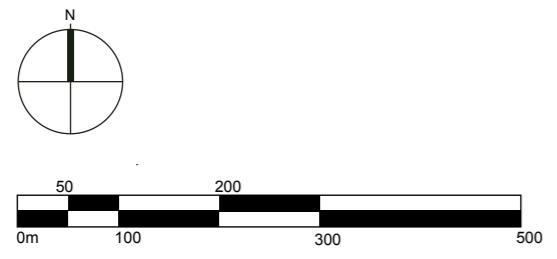
A number of features have been included within the Masterplan to respond to issues raised in the appraisal. These are shown on **Figure Six** and are summarised as:

- 1 A robust landscape buffer, incorporating native tree and shrub planting, SuDS and grassland softens views of the development edge and provides separation from Baggeridge Country Park and White’s Wood.
- 2 Linear parklands within the site intersect with retained hedgerow corridors as part of a strong green infrastructure network and incorporate the HSE inner and middle zones for the Tipton Auto/Haglay gas main and overhead powerlines.
- 3 Existing hedgerows will be retained within the development where possible. As well as providing the basis for green corridor links across the development they will help to integrate the proposed development into the existing landscape.
- 4 The school site will be located in the south west corner where it is easily accessible by the surrounding communities but also form part of an open space buffer alongside Miners Walk.
- 5 Proposed development will be carefully arranged on the highest parts of the site to minimise visual impact. This may include the use of single storey properties to reduce the scale of development in some locations.
- 6 Open space maintained as backdrop to localised view from the Toposcope in Baggeridge Country Park.
- 7 Strengthen belts of tree planting along the site perimeter to strengthen the existing landscape structure and help to screen the development in views from the surrounding area.
- 8 Access road orientated along the view to the chimney stack within Baggeridge Village when entering the site to the north off Sandyfields Road.
- 9 East facing slope kept open to maintain sense of separation from edge of Sedgley and minimise harm to the Green Belt.
- 10 An open parkland area provides an attractive setting to Himley Hall Registered Park and Garden. Strategically placed tree planting and roadside hedgerows will help to frame views and filter the proposed housing edge.
- 11 Buildings arranged to present a more sympathetic frontage to the settlement edge in views from High Arcal Road.
- 12 SuDS and open space provide a buffer between the development edge and the adjacent wildlife site.

Figure Six
MITIGATION MEASURES

LEGEND

-  Site boundary
-  Existing vegetation
-  Residential block
-  Potential school site
-  Open space
-  LEAP
-  NEAP
-  Tree/woodland planting
-  Existing watercourse/body
-  SuDS
-  Existing road
-  Primary street
-  Secondary/tertiary street
-  Bridleway
-  Public footpath
-  Informal path
-  Pedestrian/cycle links
-  Pedestrian/cycle link/emergency access
-  Nearby bus stop
-  Key local facility
-  Car park
-  Local landmark
-  Viewing area
-  Views
-  Key building
-  Focal building
-  Overhead powerline



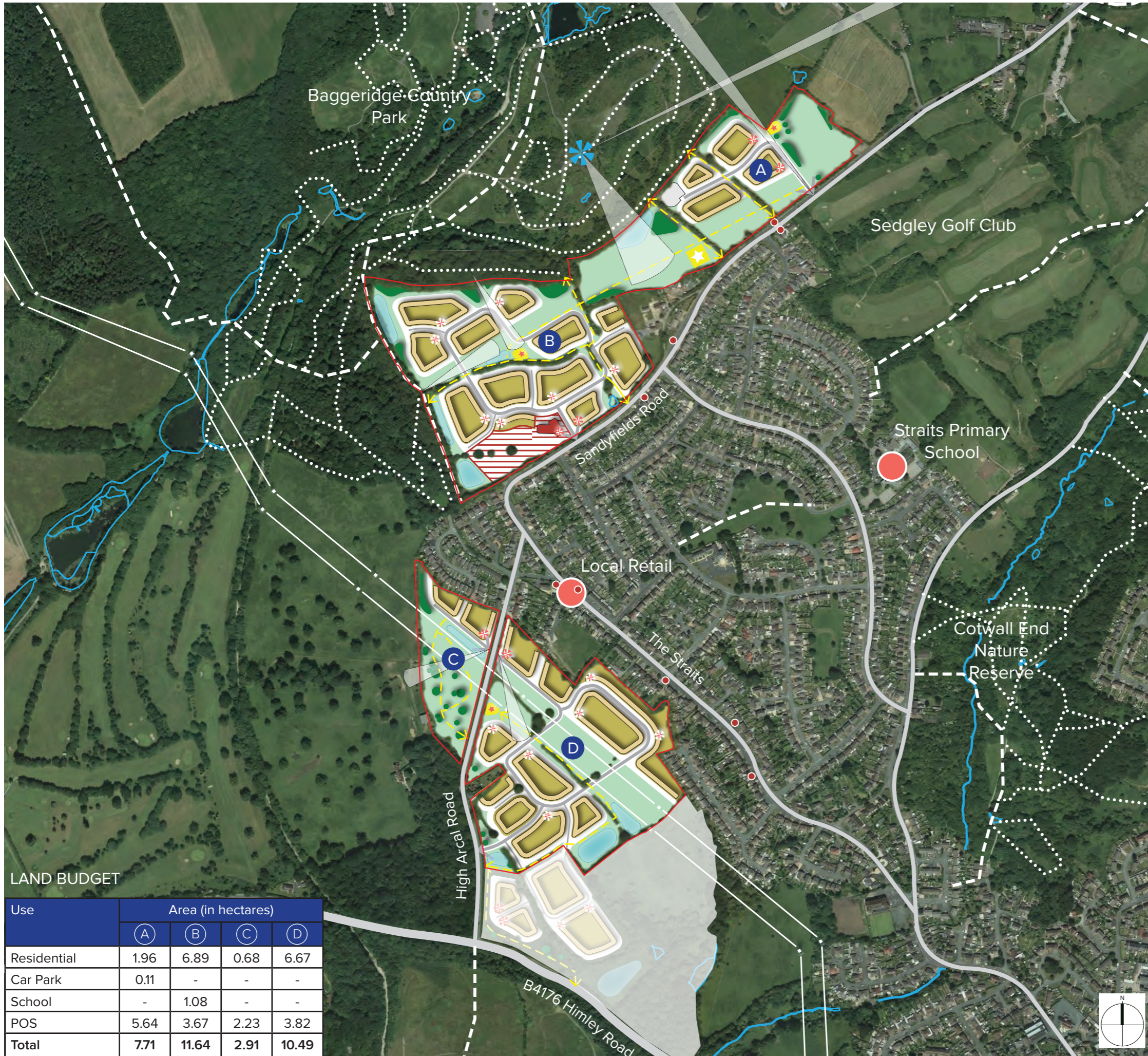
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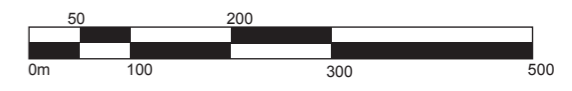
APPENDIX 3

Illustrative Concept Plan



LEGEND

- Site boundary
- Existing vegetation
- Residential block
- Potential school site
- Open space
- LEAP
- NEAP
- Tree/woodland planting
- Existing watercourse/body
- SuDS
- Existing road
- Primary street
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- Key local facility
- Car park
- Local landmark
- Viewing area
- Views
- Key building
- Focal building
- Overhead powerline



LAND BUDGET

Use	Area (in hectares)			
	(A)	(B)	(C)	(D)
Residential	1.96	6.89	0.68	6.67
Car Park	0.11	-	-	-
School	-	1.08	-	-
POS	5.64	3.67	2.23	3.82
Total	7.71	11.64	2.91	10.49



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Bloor Homes Ltd, Client
Land at The Straits Project
Masterplan Title
1:7,500 @ A3 Scale