



PLANNING AND DEVELOPMENT CONSULTANTS

A New Development Strategy for South Staffordshire 2018-2038

The Local Plan Review

Preferred Options - November 2021

LAND AT THE WERGS - Messrs. D. PARTON & R. ASTON – SHELAA parcels 236 & 237

1. I refer to the above consultation and confirm that I continue to act for the owners as above of the land identified on the attached plan.
2. The land concerned has been considered previously in the SHELAA – parcels numbered 236 and 237 – categorised as “potentially suitable”. It is noted that the latest version of SHELAA refers only to site 236 which includes additional land to the north of my clients’ land holding. The categorisation remains the same as above.
3. In general terms, it is considered that the Council’s approach continues to place far too much emphasis on the “strategic development locations”, most particularly proposals SA2 (Cross Green) and SA3 (Linthouse Lane). It now appears that SA2 only “safeguards” the land for the potential rail-based parkway with no requirement for it to be provided (in contrast to previous Infrastructure Delivery Plan’s implicit indications). The release of green belt with assessed “very high” harm in this location appears to have far less justification now in the context of the proposed “infrastructure led” approach.

4. Moreover, it is also noted that one of the key changes proposed since the 2019 consultation is to reduce the amount of growth allocated to the western edge of the Black Country, “..reflecting the relatively limited unmet need arising from Dudley Metropolitan Borough, which also holds significant Green Belt site options area within its own administrative boundary as set out in the GBHMA Strategic Growth Study...”. As a consequence there is only one significant proposed housing allocation on the western edge of the Black Country – site proposal 582 at Langley Road with a minimum capacity of 390 dwellings.

5. As with the strategic development location, this large allocation put the delivery of a large part of the new housing requirement firmly in the hands of the larger developers, who will consequently potentially dictate supply. It is considered that the strategy should instead seek to deliver more growth around both the edges of settlements in locations which are already sustainable and deliverable and on smaller sites around the conurbation edge.

6. In addition, it is noted that the proposed strategy does not allow for any new safeguarded areas of land. In accordance with paragraph 140 of the NPPF, the strategy should provide for further Green Belt release that will, inevitably, be required to meet future development needs. Safeguarded land should continue to be identified within the higher Tier settlements and on the conurbation edge.

7. As previously pointed out, it is noted that the Green Belt Assessment (Parcel ref. S46B) considers some 776 has. of land “Between Wolverhampton and Codsall”. This incorporates my clients’ land. The overall Green Belt assessment as “high” is not considered appropriate for my clients’ land and this is recognised in the assessment for Parcel Ref. S46Bs2 on page 556. The assessment is downgraded to “moderate-high”, where the explanation includes the following: “..limited areas of land identified ..could be released without significantly compromising the distinction between Codsall and the West Midland Conurbation. The release of the identified areas...would simplify the resulting Green Belt boundary without weakening the integrity of surrounding Green Belt land”.

8. Significantly, one of the “areas of land identified” is my clients’ land parcels. Our assessment is that the harm from development of my client’s land parcels is limited both by the scale of development envisaged and also by the context and setting of the land.

9. It is also noted that the Landscape Sensitivity Assessment (Area Ref SL35) considers some 175 has of land to the south of Codsall and rates this area as “Moderate – High”. It is considered that this assessment is distorted by the inclusion of the designated “Historic Landscape Area” within the 175 has.. The development of my clients’ land parcels will have very limited landscape impact in themselves.

10. The potential of a variety of small sites on the western edge of the conurbation and particularly those close to public transport routes/corridors has been noted previously. My clients’ land parcels fit the above description, particularly the proximity of bus stops/routes on the nearby A41 (some 200 metres to the south) and have other locational advantages including proximity to schools and the shops and other services in Tettenhall village. Moreover, the land parcels are deliverable either individually or comprehensively, without any ownership or known technical constraints to development.

11. My clients, therefore, consider that their land parcels should be allocated for future housing development or removed from the green belt and safeguarded for longer term development in the Review for the principal reasons set out above. This would provide more flexibility in meeting current and future housing needs than the approach set out in the Council’s current preferred options.