



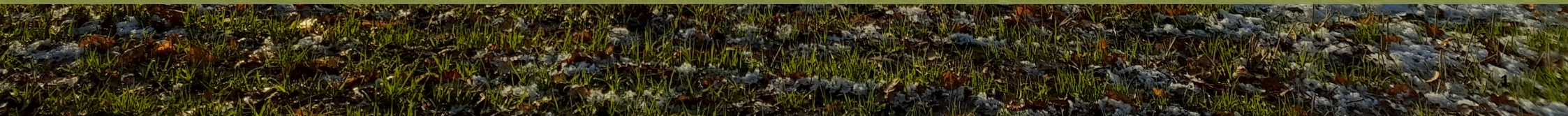
# **Regulation 19 Representation - Land off Heath House Lane**

## **BH031-Bungalow Site**

**For: Boningale Homes Limited**

**Report No.MAN.710.003.PL.R.003**

**December 2022**







# BONINGALE HOMES

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# 2.0 SITE CONTEXT

## 2.1 SITE LOCATION

- 2.1.1 The site is located in a parcel of agricultural land to the east of Heath House Lane, nr. Postcode WV8 2HW (Figures 3 and 4).
- 2.1.2 The site is centred at grid reference X: 386531 Y: 302285.
- 2.1.3 The representation site area is approximately 3.33 hectares.



Figure 3: Site Location Plan



Figure 4: Aerial view of Site Location

# 1.0 INTRODUCTION TO THE SITE

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## 1.1 INTRODUCTION

- 1.1.1 This representation to the South Staffordshire Local Plan Review Regulation 19 consultation has been prepared by Enzygo Ltd. on behalf of Boningale Homes Ltd.
- 1.1.2 Boningale Homes have different land interests across the South Staffordshire District.
- 1.1.3 This representation contains information relating to the following land parcel:
- **BH031—Land off Heath House Lane** (SHELAA Site Reference: Site 515) (See Figures 1 and 2).



*Figure 1: View of site looking north (taken from southern boundary)*



*Figure 2: View of site looking south (taken from northern boundary)*

## 3.0 SITE CHARACTERISTICS

### 3.1 PROXIMITY TO LOCAL FACILITIES

- 3.1.1 The distance people need to travel in order to reach employment, facilities and services will inevitably affect the mode of travel and the sustainability of a location.
- 3.1.2 In regard to this site, the nearest village is Codsall which is located approx. 1.15km northeast (Figure 5).
- 3.1.3 Codsall features a variety of local facilities and services. There are educational facilities such as ST Nicholas CE (VC) First School, Codsall Middle School and Codsall Community High School located within the village. Other facilities include Codsall Village Hall, Codsall Community High School, Codsall Railway Station and a number of shops, bars and restaurants.
- 3.1.4 Approximately 0.15km east of the site lies Codsall & Wergs Garden Centre. The Wergs Hall Fishery and Lakeside Café lie approx. 0.5km south of the site, within walking distance.
- 3.1.5 Wolverhampton city centre lies 5.7km to the northeast.

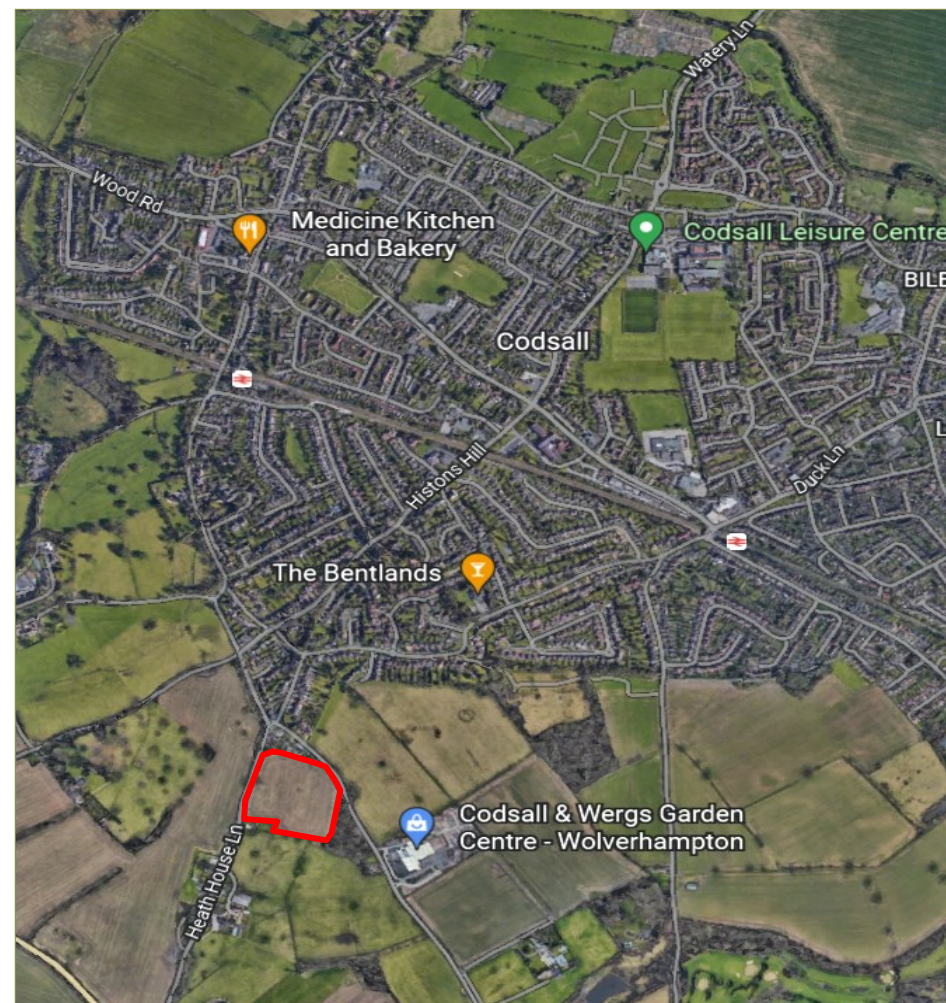


Figure 5: Site in relation to the wider context of Codsall Village (site denoted by red line)

## 3.2 LANDSCAPE AND VISUAL IMPACT

- 3.2.1 The site lies to the east of Heath House Lane and west of Wergs Hall Road . The eastern and southern site boundaries feature a well established hedgerow, separating the site from the adjacent roads and agricultural fields.
- 3.2.2 The western site boundary lies adjacent to an existing woodland coppice and field pond , which offers natural screening to the site from the neighbouring Codsall & Wergs Garden Centre.
- 3.2.3 There are residential properties located to the north of the site, located where Heath House Lane and Wergs Hall Road meet. These properties are visible from the site, with limited existing hedgerow vegetation acting as a natural buffer (Figure 6).
- 3.2.4 An isolated property, Cote Leasowe, lies to the immediate southwest of the site and has clear views across the site in a northern direction. Existing vegetation bounding the site and Cote Leasowe is limited.
- 3.2.5 The relationship with these residential properties would need to be carefully considered within an appropriate scheme design and landscape strategy. The size of the land parcel offers the potential for suitable set-backs, spaces and boundary treatments to be considered as part of the design process.



*Figure 6: Site photograph of Residential Properties on the Northern Boundary.*



### 3.3 PUBLIC RIGHTS OF WAY (PRoW) & PUBLIC TRANSPORT

3.3.1 There are no PRoWs within the site boundary.

3.3.2 The Codsall 28 (Footpath) lies northeast of the site on Sucking Green Lane, towards Bilbrook Village.

3.3.3 The nearest bus stop lies approx. 0.2km southwest of the site, located on Wrottesly Park Road and is served by the 891 bus service and the 710 school bus route. The nearest railway station, Codsall Railway Station, lies approximately 1km north of the north-eastern site boundary.

### 3.4 ACCESS

3.4.1 Access to the site is currently taken via an existing gap in the western boundary hedge row, located on Heath House Lane (Figure 7).

3.4.2 The current access point provides clear views across the site towards the eastern site boundary.

3.4.1 Views of Heath House Lane, in a northern direction from the site access points are limited. However, views in a southerly direction are clear.



*Figure 7: Site access off Heath House Lane*

### 3.5 FLOODING/DRAINAGE

- 3.5.1 The Environment Agency flood mapping confirms the site is in Flood Zone 1 and therefore is at low risk of fluvial flooding (Figure 7 and 8).
- 3.5.2 The Environment Agency flood mapping also confirms the majority of the site is not at risk of surface water flooding, although there are small pockets of land within the northern and central portions of the site, identified at low risk of surface water flooding (Figure 9).
- 3.5.3 There are areas of standing water in the east of the central portion of the site due to the slightly undulating topography.

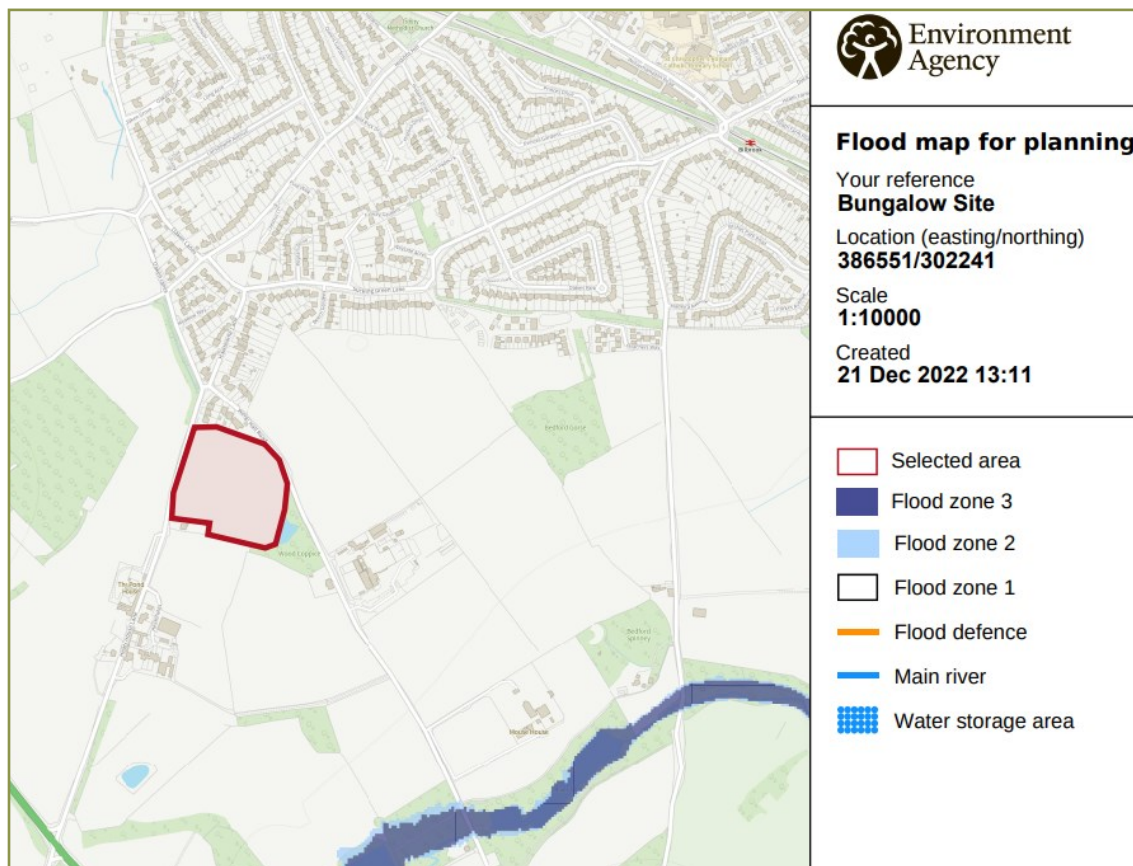


Figure 8: Environment Agency Flood Zone Map

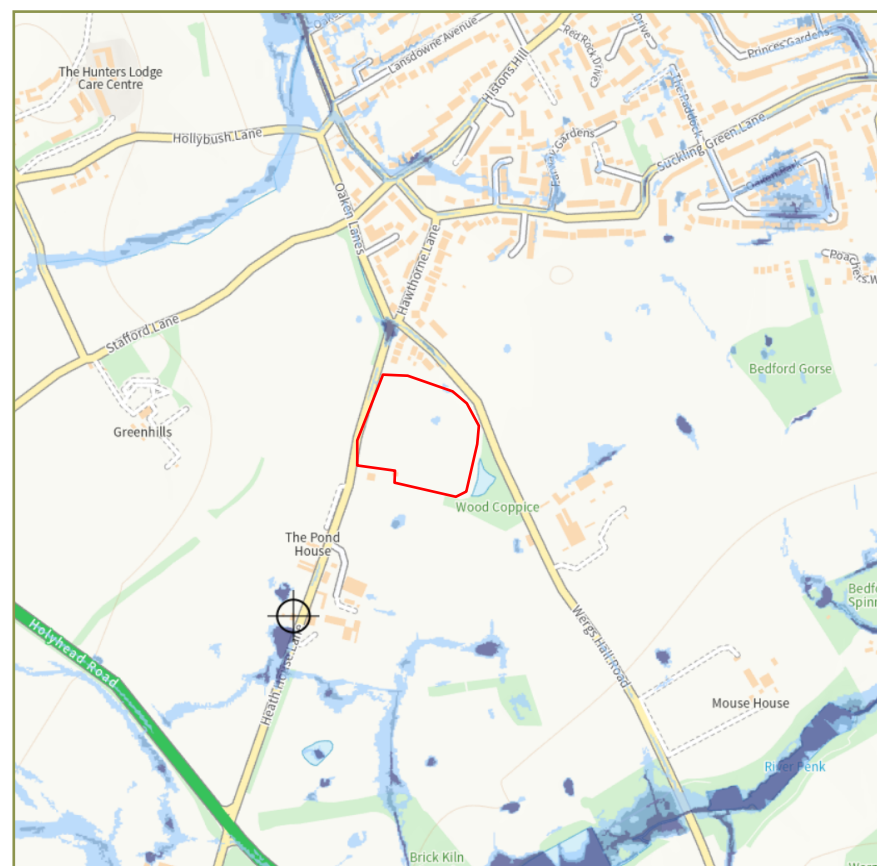


Figure 9: Environment Agency Surface Water Frisk Map

## 3.6 HERITAGE IMPACTS

3.6.1 The site is not within a Conservation Area.

3.6.2 There are no listed buildings or other defined heritage assets within the boundary. However, there are 8 listed buildings within a 1km buffer of the site (Figure 10).

3.6.3 Those closest to the site are:

- **Greenhills (Grade II)** – located approx. 0.45km west of the site;
- **Coach House, Stable Stock, Gate Piers to the south west of Greenhills (Grade II)** – located approx. 0.47km west of the site; and
- **Milepost at NGR SJ 86180165 (Grade II)** – located approx. 0.60km southwest of the site.

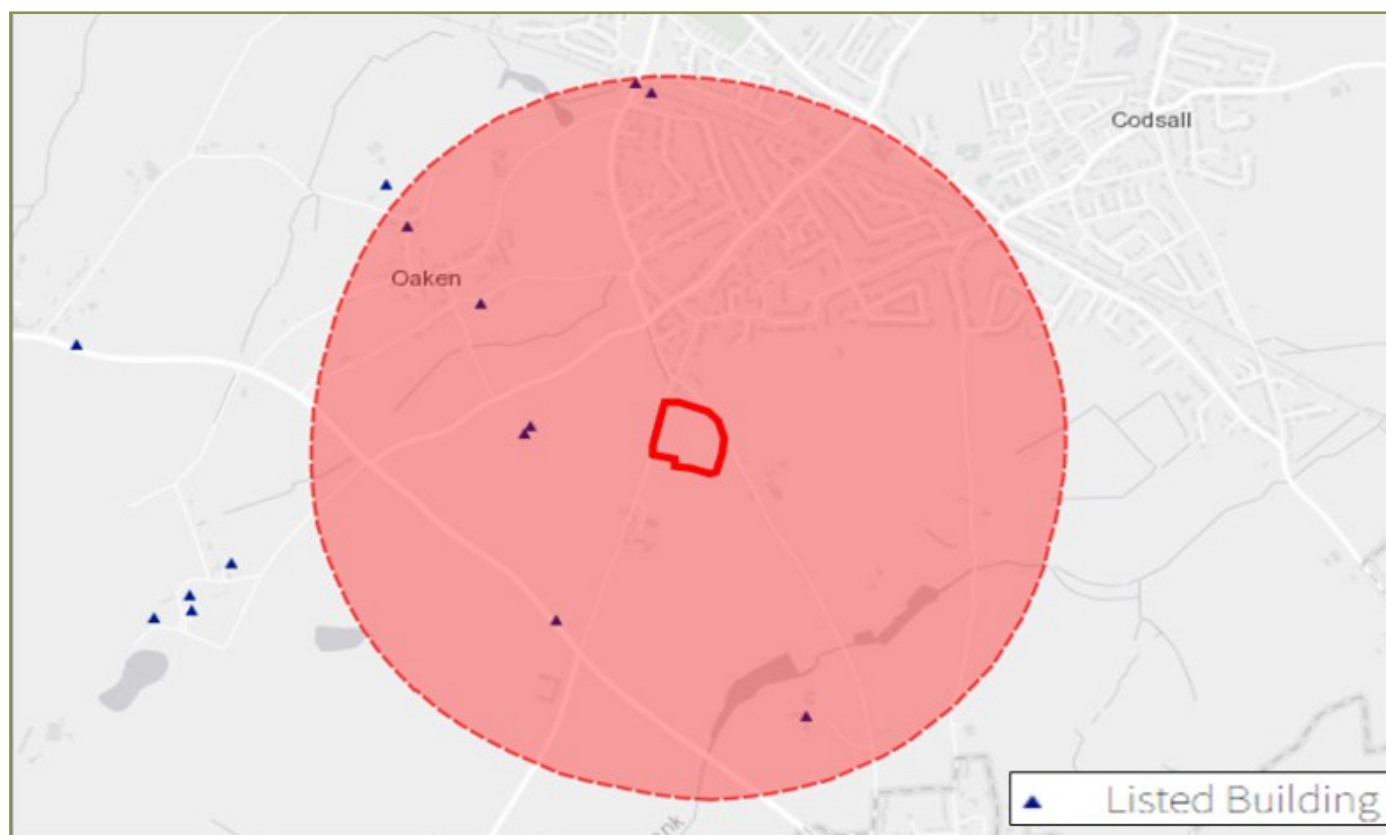


Figure 10: Historic England Extract—Heritage Assets

## 3.7 ECOLOGY

- 3.7.1 The site is not subject to ecological designations, nor or there any within a 1km buffer of the site.
- 3.7.2 Trees are not present within the site boundary, however there is a dense woodland coppice to the immediate east.

## 3.8 AGRICULTURAL LAND CLASSIFICATION

- 3.8.1 The Natural England Agricultural Land Classification Map shows the site to be Grade 3 (good to moderate quality agricultural land); the wider area falls within Grade 3 with areas of Grade 2 to the south (Figure 11).
- 3.8.2 There are no known drainage constraints which would form insurmountable barriers to the delivery of the site subject to detailed design and consideration of infrastructure capacity.
- 3.8.3 Land to the immediate east of the site is classified as ‘Land Predominantly in Urban Use’, located on the settlement edges of Codsall and Wolverhampton.

## 3.9 TOPOGRAPHY

- 3.9.1 The site is largely flat, although undulates slightly in the centre.
- 3.9.2 The development is not considered to be constrained by topography.

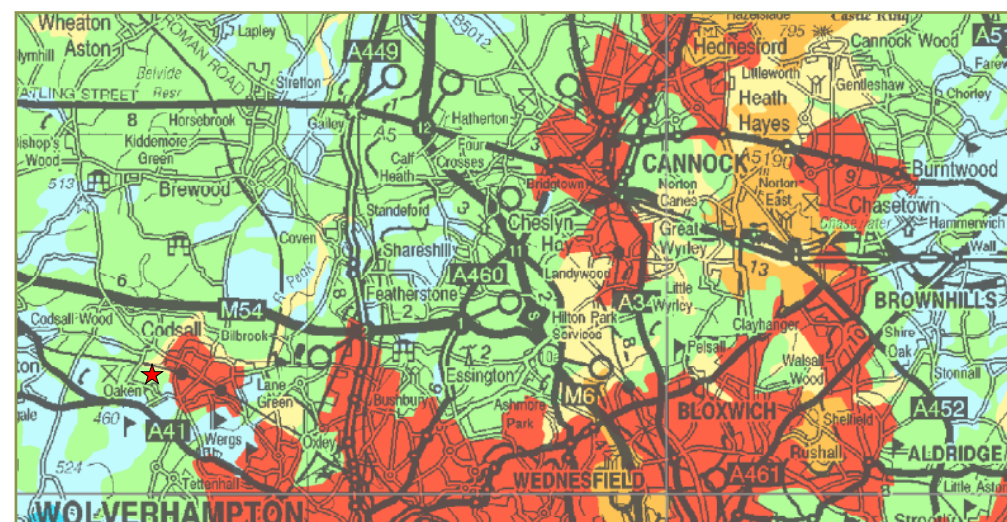


Figure 11: Extract—National England Land Classification Map (site denoted by red star)

## 4.0 LOCAL PLAN REVIEW CONTEXT AND SPATIAL STRATEGY

### 4.1 CODSALL/BILBROOK SPATIAL STRATEGY (REGULATION 19 LOCAL PLAN REVIEW CONTEXT)

4.1.1 The Regulation 19 Publication LP notes the following for Codsall / Bilbrook settlement at Para 5.42 p40:

*“5.42 Housing growth in this part of the district will be largely focused on Codsall/Bilbrook. Increased allocations around the village will deliver housing growth alongside a mix of other uses, including a new first school, local retail and strategic green Infrastructure. This recognises the recommendations for proportionate dispersal around Codsall/Bilbrook in the GBBCHMA Strategic Growth Study and the greater level of services and facilities in this area compared to other villages in the district, including access to two railway stations. The level of growth to be delivered is also aligned to the level of growth advised by the Education Authority to deliver an appropriately sized First School in this location whilst avoiding creating capacity issues at the Middle and High School level. It also offers opportunities to deliver additional station car parking at Codsall.”*

4.1.2 The proposed allocations for Codsall are shown on p40 of the Publication LP. The Regulation Publication LP proposes to allocate the following sites for residential development:

- Bilbrook House. Residential re-allocation in the middle of the settlement. 13 dwellings. SHELAA Site 213.
- Land East of Bilbrook. Large greenbelt strategic allocation to southeast of settlement. 848 dwellings. SHELAA site 519.
- Land adjacent to Station Road. Greenbelt land to northwest of settlement. 85 dwellings. SHELAA site 224.

- Former adults training centre at Histons Hill. SAD Site 228 (carried forward brownfield re-allocation middle of settlement). 29 dwellings.
- Land at Keepers Lane and Wergs Hall Road. Carried forward safeguarded land to south of settlement. 317 dwellings. SHELAA site 419a&b.

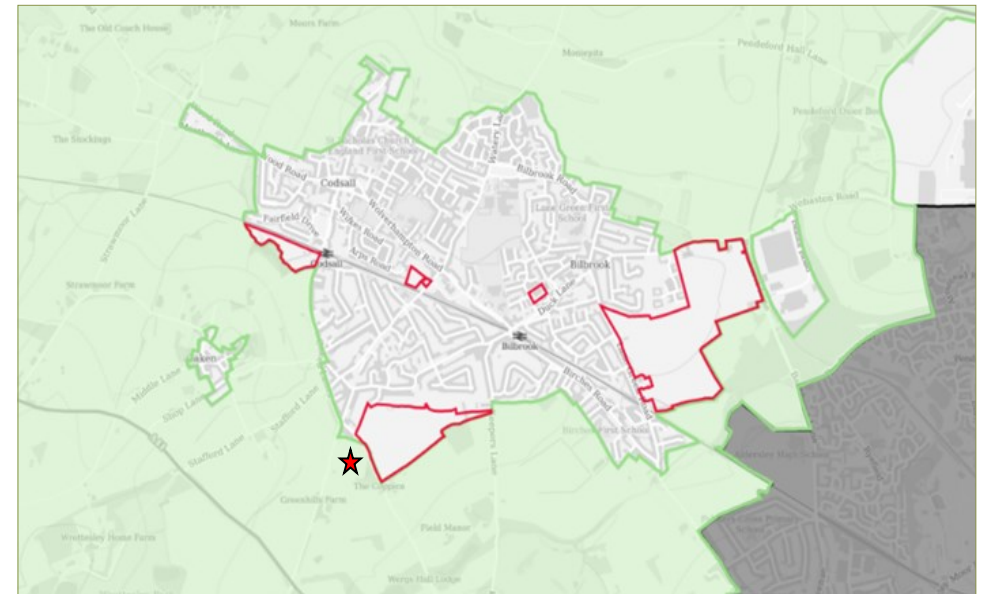
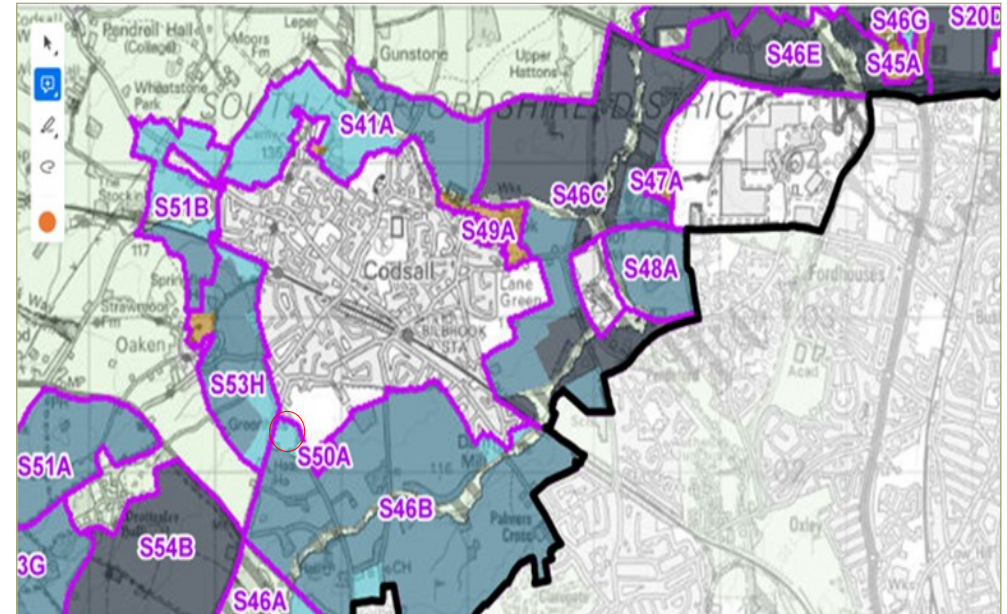


Figure 12: Extract—South Staffordshire District Council Local Plan Review Publication

4.1.3 The proposed allocations are shown on Figure 12 below. This figure also shows the location of Codsall / Bilbrook in relation to Wolverhampton administrative area.

## 4.2 SITE IN CONTEXT OF SPATIAL STRATEGY AND GREEN BELT ASSESSMENT

- 4.2.1 The site subject to this representation is located directly adjacent to the Tier 1 settlement of Codsall. Tier 1 settlements are recognised as providing the highest level of access to facilities and services in the South Staffordshire District.
- 4.2.2 The South Staffordshire Green Belt Study Addendum Final Report Prepared by LUC (August 2022) shows the location of the site in relation to surrounding land parcels (Figure 13). The brown shading denotes 'moderate' greenbelt harm, light blue shading denotes 'moderate-high' harm, dark blue shading denotes a 'high' harm rating and black shading denotes a 'very high' harm rating. Please note the safeguarded land to the south of the settlement has not been assessed as part of the 2019 or 2022 LUC Green Belt assessment conducted on behalf of South Staffordshire Council.
- 4.2.3 The Stage 2 Greenbelt Assessment for South Staffordshire (LUC, July 2019 Appendix 3, p556) identifies that the representation site is located in an area of moderate-high greenbelt harm in relation to the identified LUC identified parcel S46Bs2 (Figure 13). This land parcel covers a relatively wide geographical area encompassing the majority of land to the south of Codsall, with the site located in the extreme north-west corner of this parcel (LUC Parcel S46Bs2). It is also important to note that the representation site has a lower 'harm rating' than the majority of land within this greenbelt parcel, and in comparison to other land parcels near to the settlement edge (and in particular other parcels near to the Wolverhampton administrative boundary as illustrated on Figure 14.
- 4.2.4 It is also important to note that within Appendix 3 of the supporting text of the Stage 2 2019 Greenbelt Assessment (LUC, July 2019 Appendix 3 p556) the following statement with reference to parcel S46Bs2:



**Figure 13: Extract—LUC Greenbelt Study 2022 (site denoted by red circle).**

*“The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the surrounding countryside. However limited areas of land identified on either side of the River Valley lying within this sub-parcel could be released without significantly compromising the distinction between Codsall and the West Midlands conurbation. The release of these identified areas, some of which are partially contained by or contain urbanising uses, would simplify the resulting Green Belt boundary without weakening the integrity of surrounding Green Belt land.”*

4.2. Various maps within the 2019 LUC Greenbelt Assessment and supporting appendices also denote that the majority of land within the wider greenbelt parcel (S46Bs2) are attributed a 'high' level of harm assessment (as shown on the map shading), which may have potentially led to an elevated aggregate scoring for this parcel as a whole.

4.2.6 The concern for Boningale is that the 2019 and 2022 updates differ in some of its interpretation of the parcels of land, particularly at Codsall than the earlier greenbelt assessments conducted in 2014 and 2016, also carried out by LUC. We understand that the 2019 Green Belt Assessment has been produced to provide an update to inform the emerging Local Plan and to respond to any land use changes since the original Green Belt Assessment was published. Although the assessment methodologies are different, the five key purposes of Green Belt remain the same. It is also true that the areas to the south and west of Codsall have had no major development during the time of adoption of the current Local Plan and the current review.

4.2.7 Notwithstanding this, Boningale wish to highlight the statement in the supporting text of the Phase 2 LUC Greenbelt Assessment (2019) which highlights that the site is located within an area partially contained by urbanising uses, which would simplify the resulting greenbelt boundary without weakening the integrity of surrounding greenbelt land. Such uses in relation to the representation site include the settlement edge of Codsall to the north, the proposed Regulation 19 site allocation at Keeper Lane to the east, an existing garden centre and business park on Wergs Lane to the south-east, a residential dwelling to the south and road infrastructure in the form of Heath House Lane to the west. It is therefore considered that the representation site would comprise a natural extension to the settlement edge, without comprising the purposes of the greenbelt.

4.2.8 The site presents an opportunity for an additional or alternative site under Policy SA5 of the local plan that would be consistent with the proposed spatial hierarchy and spatial distribution of sites around Tier 1 settlements, subject to the consideration of Green Belt boundaries under Policy DS1.

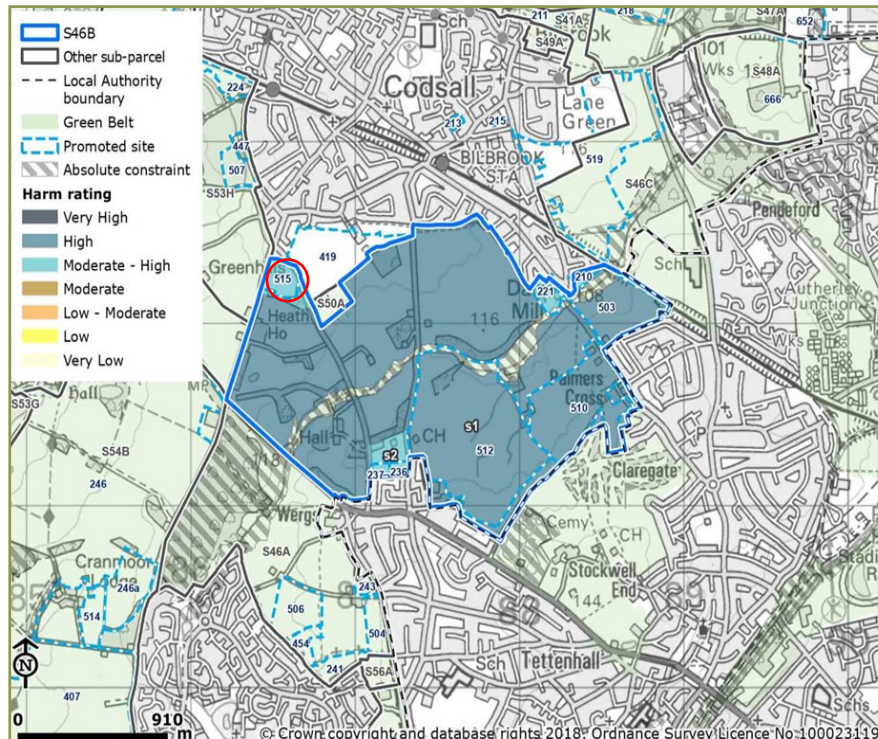


Figure 14: Extract— LUC Green Belt Parcel S46Bs2 (2019)

## 4.3 SHELAA ASSESSMENTS

4.3.1 In respect of the SHEELA proformas, both sites 515 and 419a/b demonstrate similar characteristics across some categories. Other key similarities and differences based on the SHEELA proformas are set out in Table 1 below (pg. 16—17).

4.3.2 The table below shows direct quotes from the SHEELA Assessment:

Similarities in demonstrable site characteristics applicable to both Site 515 and Sites 419a&b (SHELAA)	Differences in characteristics Site 515 (SHELAA) Proposed Representation Site	Differences in characteristics Sites 419a&b (SHELAA) Reg 19 allocation site / safeguarded land
Major negative effects are predicted in the SA against the education criteria, due to new residents distance from both primary and secondary education (both sites).	Major negative effects are predicted against the landscape criteria, due to the site’s Green Belt harm and landscape sensitivity. Green belt harm Moderate - High	This site is on non-Green Belt land, having been safeguarded for development through the Site Allocations Document 2018. A greenbelt assessment has therefore not been provided.
	Landscape Sensitivity Moderate-High.	The site was previously selected as being suitable for development through the Site Allocations Document 2018. This judgement had regard to its landscape sensitivity. Therefore, there site’s landscape sensitivity has not been reviewed.
	HESA scores the site a green for direct potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required. The HESA scores the site an amber for indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.
LLFA comments “Low risk” (both sites)		



	<p>The site provides an opportunity to deliver some of the growth identified for Bilbrook and Codsall in the Spatial Housing Strategy and Infrastructure Delivery Plan (2019) consultation. Due to its shape, size and location the site is not considered likely to be capable of delivering the first school required to serve Bilbrook and Codsall. The site is remote from Codsall train station, meaning it may not be capable of delivering extra car parking to serve the station, which is identified in the IDP.</p>	<p>Site (419b) provides an opportunity to deliver some of the growth identified for Bilbrook and Codsall in the Spatial Housing Strategy and Infrastructure Delivery Plan (2019) consultation. Due to its larger size, the site may be physically capable of accommodating the first school required to serve Bilbrook and Codsall, although this has not been demonstrated by the site promoter. However, to date there is no indication that the site is available for this purpose. The site is remote from Codsall train station, meaning it is unlikely to be capable of delivering extra car parking to serve the station, which is identified in the IDP.</p>
	<p>The centre of the site is roughly 1.3km to the nearest regular bus stop, 1.4km to the nearest rail station, 1.4km to the nearest village/neighbourhood centre and 1.5km to the nearest education facility.</p>	<p>The centre of Site 419b is roughly 1km to the nearest regular bus stop, 1km to the nearest rail station, 1km to the nearest village/neighbourhood centre and 1.1km to the nearest education facility.</p> <p>The centre of the site 419a is roughly 680m to the nearest regular bus stop, 670m to the nearest rail station, 620m to the nearest village/neighbourhood centre and 730m to the nearest education facility.</p>
	<p>County Highways assessment                  “Ok in principle, need to put footway in along site frontage.”</p>	<p>County Highways assessment                  “All sites reviewed together with representations received to the SAD preferred options consultation. Changed assessment score. Ok in principle subject to detailed assessment. Would need existing footway extending and existing speed limit would need to be extended.”</p>

	<ul style="list-style-type: none"> <li>- The site could provide access to pedestrian footways into the wider settlement</li> <li>- Its development would appear to remove an area of agricultural land</li> <li>- The site is bounded by a well-established hedgerow which</li> </ul>	<ul style="list-style-type: none"> <li>- The site could provide access to pedestrian footways into the wider settlement</li> <li>- The site is agricultural land</li> <li>- Some limited TPOs sit within the western end of the site (417b)</li> <li>-The site is agricultural land bisected by a landscape buffer (417a)</li> </ul>
		<ul style="list-style-type: none"> <li>- The site, if delivered with the adjacent safeguarded land to the east (site 419a), would provide connectivity between Wergs Hall Road and Keepers Lane</li> <li>- The site’s large and regular shape would offer opportunities for a</li> </ul>
	<p>Key positives and negatives:</p> <ul style="list-style-type: none"> <li>• Lesser Green Belt harm than the majority of land around Bilbrook/Codsall (site is ‘moderate/high’)</li> <li>• In a higher sensitivity landscape to the majority of land around Bilbrook/Codsall (site is ‘moderate/high’)</li> <li>• Major negative impacts predicted against education in the Sustainability Appraisal</li> <li>• Due to site size and location, unlikely to be able to deliver the required Codsall station car parking or required first school for Codsall/Bilbrook</li> </ul>	<p>Key positives and negatives:</p> <ul style="list-style-type: none"> <li>• In non-Green Belt safeguarded land allocated as safeguarded land in Site Allocations Document 2018</li> <li>• Due to site size, has capacity to deliver required first school to serve the villages (Site 419b)</li> <li>• Major negative impacts predicted against education in the Sustainability Appraisal</li> </ul>

Table 1: Extract—SHEELA Proformas

## 4.4 OTHER SPATIAL STRATEGY CONSIDERATIONS

4.4.1 Figure 14 shows that the site offers a sustainable location in terms of access to local facilities and services. It is noted that the representation site (in similarity with the proposed regulation 19 allocation 'Land at Keepers Lane', SHEELA site 419a&b is located to the south of the majority of local schools and that mitigation and enhancement measures are likely to be required with regards to access and / or capacity provision. The South Staffordshire Council's Housing Site Selection Topic Paper (November 2022) at Section 5.3 does not consider this a barrier to constraint to the existing safeguarded site at Keepers Lane.

4.4.2 Both SHEELA site 515 and Sites 419a&b are shown to be located between the green 10-20 minutes walking distance) and light blue (20-30 minutes walking distance) to primary and first schools based on Staffordshire County Council mapping (2021), with the same pattern exhibited for walking distance to middle schools.

4.4.3 Figure 15 shows the location of bus routes and bus stops to the west of the site along Heath House Lane which provide access to local school. The Site Access Appraisal which accompanies this site representation identifies that bus stops are located approximately 260m to the north-west of the centre of the site, which are served by bus service 10B between Codsall and Wolverhampton and the number 710 school service. These bus stops are within the recommended 400m walking distance to the nearest bus stops, however the services are infrequent.

4.4.4 The Site Access Appraisal has demonstrated that subject to future capacity analysis, a compliant site access strategy could be delivered to serve the potential development of circa. 90 dwellings and that the site also has the potential to tie into existing infrastructure to allow opportunities for travel by non-car modes. Having due regard to Paragraphs 110 and 111 of the NPPF, this report also demonstrates that a safe and suitable access arrangement could be provided as part of any future planning submission for the site.



Figure 15: Site in relation to Public Transport and Local Facilities

## 5.0 CONCLUSION

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### 5.1 SUMMARY

- 5.1.1 The site is located on a parcel of agricultural land to the east of Heath House Lane. Agricultural fields, a wooded coppice, roads and residential properties bound the site. The representation site comprises an area of approximately 3.33 hectares.
- 5.1.2 The site is located within the West Midlands Greenbelt. The site is located within an area partially contained by urbanising uses. Such uses in relation to the site include the settlement edge of the Tier 1 settlement Codsall, located adjacent to the northern boundary. A proposed Regulation 19 site allocation, an existing garden centre, business park and residential dwellings are also located in the vicinity of the site. This, in combination with the site location and existing context, as described above, would help to comprise a natural extension to the settlement edge, ensuring that the five key purposes of the Green Belt are maintained.
- 5.1.2 The village centre of Codsall is located approximately 1.15km northeast of the site. Wolverhampton city centre lies approx. 5.7km southeast of the site.
- 5.1.3 In terms of public transport, there are bus stops located approximately 260m to the northwest of the centre of the site, within walking distance. The 10B bus route to Wolverhampton and the 710 school service both serve this stop. The nearest railway station, Codsall Railway Station, lies approximately 1km north of the site. As such, the site is accessible by public transport and sustainable travel options.
- 5.1.3 As well as a need for additional Green Belt land to be allocated and released to meet additional housing land requirements, the Local Plan Review should consider land for safeguarding purposes, if development in its identified expansion areas is delayed. This ensures the Local Plan maintains its flexibility. In this regard, Land West of Heath House Lane, Codsall provides capacity for immediate housing development and a substantial and sustainable area of suitable land that can be safeguarded.
- 5.1.4 This representation site should also be read in conjunction with Boningale Homes West of Heath Lane, Codsall site submission (BH032).

**This document was prepared by Enzygo Ltd on behalf of Boningale Homes Ltd.**