

**SOUTH STAFFORDSHIRE LOCAL PLAN
PUBLICATION PLAN NOVEMBER 2022
REGULATION 19 CONSULTATION**

**NORTH OF LANGLEY ROAD (ADJOINING CITY OF
WOLVERHAMPTON BOUNDARY)**

REPRESENTATION PREPARED ON BEHALF OF

RICHBOROUGH ESTATES

Date: December 2022 | Pegasus Ref:P19-0658



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	December 22	ELH	DO	-
V2	December 22	ELH	DO	Amendments following comments from client
V3	December 22	ELH	DO	Clarification



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1. Introduction

- 1.1. This representation responds to the South Staffordshire District Council's ('SSDC') Local Plan Review 'Publication Plan' ('the Plan') consultation held under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Representations are made with regard to the Plan itself and to the accompanying published evidence, having regard to the National Planning Policy Framework ('NPPF').
- 1.2. This representation is made by Pegasus Group on behalf of Richborough Estates who have a specific land interest in the proposed housing allocation adjacent the boundary of Wolverhampton, identified at Policy SA5 as 'Site Ref No. 582 North of Langley Road (adjoining City of Wolverhampton Boundary)' with a minimum capacity of 390 dwellings ('the Site').
- 1.3. Richborough Estates has previously submitted details of the Site through the Regulation 18 Preferred Options Plan, which included the production of a Vision Document to demonstrate how the site could be delivered; an updated Vision Document is attached to these representations at Appendix 2 for completeness.
- 1.4. The site extends to approximately 19 hectares and is within a highly sustainable location adjacent to the City of Wolverhampton. The site adjoins the western edge of the Black Country conurbation to the north of Langley Road. The Staffordshire Railway Walk lies to the north, with existing residential properties located beyond. Existing residential properties also lie to the east and south of the site, whilst an electricity distribution substation and agricultural fields are located to the west.
- 1.5. The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the NPPF, paragraph 35. For a Plan to be sound it must be:
 - a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's 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;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives,



and based on proportionate evidence;

- c) **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
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.6. The representations also address the legal and procedural requirements associated with the plan-making process.

2. Planning Policy Context

- 2.1. Richborough Estates supports SSDC's review of the adopted South Staffordshire District Development Plan as required by Policy SAD1 of the Site Allocations Document ('SAD') 2018. This provides the opportunity for the Council to comprehensively review the Vision, Strategic Objectives, development requirements, spatial development strategy and policies shaping detailed development proposals.
- 2.2. The Plan review also provides the opportunity for the Council to not only review its own objectively assessed housing need, but also the role of the District in meeting unmet cross boundary needs from the wider Greater Birmingham and Black Country Housing Market Area ('GBBCHMA').

National Requirements for Plan-Making

- 2.3. The existing Core Strategy for South Staffordshire was adopted in 2012, and as such a holistic review of the Plan is overdue and this is also committed to within the Site Allocations Document 2018. This Local Plan Review will therefore ensure that an up-to-date Local Plan for South Staffordshire will be in place to support growth and meet future development needs.
- 2.4. The Proposed Publication Plan consultation follows previous consultations on the Local Plan 'Preferred Options' review which identified a spatial strategy for housing and employment delivery, whilst also identifying strategic objectives and priorities through numerous policies, including affordable housing. The current consultation document represents SSDC's final version of the Plan and is in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), having considered representations previously made to the Plan, as well as further evidence.
- 2.5. NPPF para 24 also confirms that local planning authorities '...are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.' In the context of South Staffordshire, strategic matters include housing, employment, infrastructure, and the Green Belt.



- 2.6. Richborough Estates supports SSDC's proactive approach in continuing with a review of the Local Plan, to ensure that an up-to-date policy framework exists within the District to guide growth to 2039 and to ensure that development is genuinely plan-led but would like to make some representations on the soundness of some parts of the Plan.

3. Vision, Strategic Objectives and Priorities

- 3.1. The Publication Plan (Regulation 19) identifies a number of 'Issues and Challenges' surrounding homes and communities, economic prosperity and the natural and built environment. The Document goes on to present a 'Vision' based upon these issues and challenges, and a number of 'Strategic Objectives' by which the Vision can be achieved.
- 3.2. It is noted that the Vision remains broadly the same as that presented in the adopted Core Strategy with regard to the aspirations to protect and enhance the District's rural character, communities, and landscape.
- 3.3. However, the Plan's objectives should be amended to reflect the need to meet both the present and future housing requirements, including those pressures arising through the Duty to Cooperate with neighbouring authorities. In this instance the well-known unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) should be clearly considered. This is considered further, later in these representations.
- 3.4. The Local Plan lacks clarity at Strategic Objective 1 and does not define exceptional circumstances for release of Green Belt land as part of its strategy. It should be made clear that the need to identify land for growth and development over the Plan period, and beyond, means that there are exceptional circumstances arising which have required a full and detailed Green Belt boundary review, with a view to identifying land that it is proposed to be released from the Green Belt to meet the District's growth requirements.
- 3.5. In relation to Strategic Objective 2, reference is made to meeting the housing and employment needs of the District. It is considered this could be strengthened to refer to meeting the needs of both existing and new residents of the District, but the overarching thrust that new housing should be focussed on sustainable locations in the District, including the key villages and the edge of conurbation of the Black Country, is supported.

4. Development Strategy

Green Belt – Policies DS1 and DS2

- 4.1. Draft Policy DS1 is broadly in line with the relevant paragraphs of the NPPF relating to development within the Green Belt and is therefore supported. However, it should be noted that Richborough Estates do not accept the Council's proposition that the Green Belt 'contributes towards rural character'. Green Belt is a development restraint policy set out at Chapter 13 of the NPPF and is not a landscape or character policy. The NPPF outlines '*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*'. Therefore, the Council should amend the text within Policy DS1 and its supporting text to represent national policy.
- 4.2. The 2018 Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Strategic Growth Study presented a strategic review of the Green Belt across the 'joint authorities' area. This review was undertaken in the light of the shortfall in housing need identified across the area. It was acknowledged that as a significant proportion of land within the Housing Market Area is covered by Green Belt, 'exceptional circumstances' through Local Plan reviews would be required to alter the Green Belt boundaries.
- 4.3. The supporting text to Policy DS1 identifies that exceptional circumstances exist for Green Belt release within the South Staffordshire District. This is supported, as is the Council's commitment to release some land from the Green Belt for development to meet identified need.
- 4.4. However, to be sound, and accord with national policy the Plan must include a consideration of Green Belt boundaries that will endure beyond the end of the Plan period in 2039. Para 140 of the NPPF states that "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."
- 4.5. The Plan should therefore identify opportunities for safeguarded land so that anticipated housing and development needs beyond 2039 are considered as part of the current Local Plan Review and, in particular, are done so in the context of the current reconsideration of

Green Belt boundaries. Safeguarding of land will ensure such needs can be addressed without the need to undertake a further Green Belt boundary review, ensuring the amended boundaries endure beyond the Plan period.

- 4.6. The currently adopted Local Plan at Policy GB2 sets out safeguarded land for the longer term needs of the District. Richborough Estates believes the proposed Local Plan would highly benefit from an introduction of a similar policy within the emerging Local Plan, especially in light of the recent collapse of the Black Country Plan which has led to greater instability of housing supply across the GBBCHMA. The introduction of safeguarded land would allow the Council to assess sites suitable for development and fully maximise the District's capability to greater assist the GBBCHMA growing unmet housing need.
- 4.7. Relevant Green Belt boundary amendments, including the identification of safeguarded land should therefore be considered in the current LP review.
- 4.8. Policy DS2 (Green Belt Compensatory Improvements) is a new policy included within the Regulation 19 Publication Plan. The Policy provides additional detail on expected compensatory improvements for Green Belt (GB) released sites when compared to the Preferred Options Document. Richborough Estates supports the inclusion of a policy setting out the need for Green Belt compensation in relation to sites being removed from the Green Belt. However, the policy still leaves elements of ambiguity and its practical application unclear. Whilst it is appreciated that the SSSC have outlined that 'applicants must demonstrate proportionate compensatory improvements', this does not provide a clear requirement for Green Belt compensation and a revised policy approach is preferred as outlined below.
- 4.9. Policy DS2 also sets out the following hierarchy for Green Belt compensation.
 - a) *Compensatory improvements to remaining Green Belt land adjacent to, or in close proximity to the development site;*
 - b) *Compensatory improvements to remaining Green Belt land within the wider locality accommodating the development;*
 - c) *Compensatory improvements to remaining Green Belt land in an area identified through the council's latest Nature Recovery Network mapping or Open Space Strategy.*

In the event that it is robustly demonstrated that none of the above options can be satisfied (e.g., as land is demonstrably not available) then the council will accept a commuted sum that it will use to undertake compensatory improvements.

- 4.10. The hierarchical approach to the GB compensation policy as drafted is not supported. Neither the NPPF nor the PPG refer to a hierarchy of preferred methods of GB compensation. Furthermore, when assessing the policy, it is not at all clear that the preferred methods of GB compensation would deliver a greater benefit than the approaches lower down the hierarchy.
- 4.11. In the first instance, it would appear that all of the potential methods (items a-c plus the penultimate paragraph) require some method of actually delivering the compensation. In practical terms this is likely to be via a S106 agreement associated with a planning permission to develop the allocation (former GB) site and which either delivers contributions towards compensatory improvements or requires the delivery of the identified improvements.
- 4.12. Whilst it is accepted that having the GB compensation located close to the allocation could be advantageous and should be pursued, ultimately it is the overall value of that GB improvement which is of greatest significance. There is also a suggestion within criteria a) and b) of the proposed policy that the preferred approach is reliant on the developer of the allocation owning additional land in the vicinity. This may not always be the case and so care must be taken to ensure that the application of the policy does not result in ransom type scenario. Similarly, a further issue relates to the potential for the lowest ranked element of the compensation hierarchy (the penultimate paragraph involving paying a commuted sum) resulting in the same, or greater, benefit than compensation associated with the highest element in the hierarchy; especially if it results in significant improvements to an existing resource. This could be as a result of the contributions secured in a commuted sum being spent on public land next to the development site.
- 4.13. Therefore, other benefits associated with particular GB compensation schemes which may be more significant than just proximity to the development site need to be explored further. For instance, the compensation could deliver enhancements to give greater public access to a recreation route such as a Canalside walk or deliver improvements to a degraded nature conservation site. Such GB compensation may deliver wider benefits than merely enhancing land in the immediate vicinity of the site.

- 4.14. In view of the above it is suggested that the policy is amended to delete reference to the hierarchy and instead state that GB compensation is required in conjunction with development of sites removed from the GB which could include improvements to green infrastructure, woodland planting, landscape and visual enhancements, biodiversity improvements, new or enhanced cycle or walking routes and improved access to new, enhanced, or existing recreational and outdoor sports provision. The policy could indicate that this could be delivered through direct improvements to land or via S106 contributions and the Council will seek the optimum public benefits in proportion to the scale of the site being removed from the GB.

Housing- Policy DS4

- 4.15. Richborough Estates broadly supports Part a of Policy DS4 which sets a housing target of 9,089 homes over the Plan period whilst providing additional homes to ensure plan flexibility. Upon review of the Local Plan evidence base, though, it is unclear how the Council have concluded that the 'flexibility allowance' should be 13% additional homes. This figure is not evidenced throughout the Evidence Base and Richborough Estates requests the Council provide clarification on this figure.
- 4.16. The principle of the proposed 4,000 houses to support the GBBCHMA shortfall is broadly supported by Richborough Estates. However, the GBBCHMA Housing Need and Housing Land Supply Position Statement (July 2020) identified the housing shortfall of the GBBCHMA as 67,160 dwellings. Further, the 'Mind the Gap' Barton Willmore Paper dated March 2021 and 'Falling Short – Taking Stock of Unmet Needs across GBBCHMA' paper by Turley in August 2021, both commissioned by HBF Members concluded that the significant unmet needs in the GBBCHMA exist now and will continue to exist in the future. Most recently, the now revoked Draft Black Country Plan 2018–2039 showed a shortfall of circa 28,000 homes in the Black Country alone and Birmingham City Council have recently suggested a potential shortfall of over 78,000 dwellings in their Development Plan review Issues and Options consultation.
- 4.17. It is important to stress that the shortfall figures in the GBBCHMA July 2020 paper did not take into consideration the 35% uplift applied to Birmingham or Wolverhampton that were subsequently introduced. The latest Black Country Plan and Birmingham Issues and Options figures therefore show the true extent of the shortfall, which is higher than that which South

Staffordshire have taken into account in preparing their Plan. As set out in the HBF representations to the Publication Plan, the Council should confirm that they could proportionately increase their contribution to unmet need based on the latest figures. The Council's commitment to meeting that unmet need should be set out in a Joint Statement of Common Ground with the other GBBCHMA authorities.

- 4.18. As a result of the overwhelming shortfall in both the Black Country and Birmingham and despite South Staffordshire allocating 4,000 homes, Richborough Estates believes there is scope for an uplift of this figure.
- 4.19. In regard to SSDC own housing needs allocation (5,330 dwellings across the plan period), the Council have allocated the minimum figure of housing required by the Standard methodology and as such, Richborough Estates raises concerns regarding a potential insufficient housing to meet the District's housing needs.
- 4.20. The starting point for the identification of housing requirements is the 2014-based sub-national household forecasts as set out in National Planning Policy Guidance ('PPG') and the utilisation of the standard method of calculation. PPG is also clear that the figure produced by the Standard Method represents a minimum figure, rather than a requirement.
- 4.21. PPG provides a non-exhaustive list of examples whereby additional growth beyond the minimum requirement may be appropriate, including relevant growth strategies for the area, strategic infrastructure improvements or accommodating unmet need from neighbouring authorities.
- 4.22. As part of the Publication Plan, the 2021 Strategic Housing Market Assessment (SHMA) was updated, with the South Staffordshire Housing Market Assessment Update published in October 2022. The 2022 SHMA presents further depth of analysis compared to the 2021 assessment and supersedes the 2021 SHMA.
- 4.23. The updated Housing Market assessment at paragraph 4.17 indicates the revised standard method in 2022 is 241 dwellings per year resulting in a minimum of 5,330 new additional homes to be planned for in South Staffordshire to cover the local need across the Plan period 2018–2039. The assessment considers the proposed target of 9,089 homes (5,089 local need and 4,000 home contribution to meet the unmet GBBCHMA need) to be greater than

the need for the District as a result of the 2021 Census data which indicated the growth within South Staffordshire to be lower than predicted in 2020.

4.24. However, there are a number of potential flaws in the 2021 Census figures, which took place during the Covid-19 pandemic. In a Paper commissioned by the Land Promoters & Developers Federation in October 2022, Quod¹ advised that the 2021 Census figures should be considered with caution. Reasons for such caution are identified in the Paper as:

- Internal Migration – many people spent lockdown somewhere different, for example leaving town to stay with parents whilst working remotely. While the Census record ‘usual residents’ this is open to definition and interpretation by people themselves and for many temporary arrangements would have been deemed to be their ‘usual residence’.
- Students – who were disrupted and learning online for a large proportion of time up to and including March 2021 at the time of the Census.

4.25. The report goes on to note that whilst there has been a general, expected slowdown in population growth, the country has not been building more homes than are needed. As an example, household formation has been artificially low, likely suppressed by unaffordability matters.

4.26. Richborough Estates considers a larger housing contribution would have benefits in reducing the likely shortfall within the GBBCHMA such as improving affordability and choice and providing a more reliable source of supply.

4.27. Richborough Estates object to Policy DS4 as not being justified based on proportionate evidence nor positively prepared in the context of the shortfall in housing across the Greater Birmingham Housing Market Area.

¹ Census 2021: What Does it Mean for Housing? Quod for LPDF, October 2022

Economic Uplift and Housing Figures

- 4.28. The South Staffordshire Housing Market Assessment 2021 (HMA) sets out the broad economic consequences of the projected growth in Chapter 5. However, the HMA fails to consider the impact of committed development at the HS2 West Midlands Interchange ('WMI'), which is projected to create around 8,500 new jobs and up to 8,100 indirect jobs off-site, well in excess of the increase in the working age population between 2018 and 2038 identified by the HMA (6,618 people). The updated HMA 2022 also does not consider the impact of the committed WMI. In addition, both the 2021 and updated 2022 HMA do not consider that significant job growth will be provided through committed strategic employment developments planned at i54 and ROF Featherstone.
- 4.29. Richborough Estates has raised concerns about the Economic Development Needs Assessment 2020–2040 (June 2022) (EDNA) in other representations. The EDNA was prepared by DLP Planning on behalf of South Staffordshire District Council and it sought to identify future employment needs across the South Staffordshire area for the period 2020–2040. The EDNA outlines that the approved WMI has the potential to employ 16,600 both on and off site.
- 4.30. The EDNA also identifies the i54 development as a key 'employment corridor' and at paragraph 4.22 states that the facility 'could lead to a profound effect on the local and sub-regional property market as demand for engineering/manufacturing space increases'.
- 4.31. The updated HMA at paragraph 5.10 identifies that the projections profiling the change in population indicate that the working age population in South Staffordshire will grow by 6,618 people between 2020 and 2040. This is notably in excess of the growth of 4,824 jobs indicated by the EDNA, albeit Richborough consider the EDNA underestimates job growth. The updated HMA at paragraph 5.13 suggests that the housing requirement of 9,089 homes over the Plan period is sufficient to address the projected economic growth for the District. However, Richborough Estates, as raised, above have concerns regarding the proposed housing figures due to the large shortfall of housing across the GBBCHMA, which has been exasperated by the rising instability of the Black Country.

Spatial Strategy



- 4.32. SSDC previously consulted on a Spatial Housing Strategy and Infrastructure Delivery (SHSID) document in October 2019. This looked at how the proposed housing target could be distributed between different settlements and other broad locations within the District.
- 4.33. Richborough Estates does not support the Local Plan strategy of limiting allocations in Perton to only the land safeguarded through the adopted SAD. Further comment on this matter is provided within a representation relevant to Perton, prepared by Pegasus Group on behalf of Richborough Estates.
- 4.34. Furthermore, whilst Featherstone is identified as a Tier 3 Settlement within the Settlement Hierarchy, it is located less than a mile away from the strategic mixed-use allocation at Cross Green (ref: 646a and 646b). It is submitted that Featherstone can play a similar role in supporting the existing and planned employment opportunities in the area, whilst also supporting the creation of additional services and facilities, to the betterment of the overall sustainability of the settlement. Further comment on this matter is provided within a representation relevant to Featherstone, prepared by Pegasus Group on behalf of Richborough Estates.

Longer Term Growth Aspirations for a new settlement- Policy DS6

- 4.35. Policy DS6 sets out an aspiration for SSDC to deliver a new settlement beyond the plan period. A broad location comprising the transport corridor formed by the A449 and West Coast Mainline between Wolverhampton and Stafford has been identified as a potential area of search for such proposals.
- 4.36. Richborough Estates made representations to the Preferred Options Plan and continues to support Policy DS6 which recognises the importance and suitability of the identified potential growth corridor. Richborough Estates also supports the objectives for the new settlement as set out within the Policy.
- 4.37. To this end, Richborough Estates is promoting Land North of the A5, Gailey, which falls within this corridor. A separate representation has been prepared by Pegasus Group on behalf of Richborough Estates which further promotes this land for allocation in a future Local Plan.

5. Site Allocations- Policy SA5 and Sustainability Appraisal Comments

- 5.1. Following the Preferred Options (Regulation 18) Plan the Council have made a number of additional amendments to certain specific sites, including identification of three additional small brownfield sites and removal of sites where the council suggested the sites were unsuitable.

Housing Allocations- Policy SA5

- 5.2. A Vision Document for Land North of Langley Road (adjoining City of Wolverhampton boundary) is submitted with this representation in support of the site, within Appendix 2.
- 5.3. South Staffordshire District Council at Strategic Objective 2 identify that housing growth will be located at the District's most sustainable locations to facilitate growth and assist in meeting the wider unmet housing needs. It is considered that land North of Langley Road is a highly sustainable site, capable of supporting housing growth to meet the housing need.
- 5.4. Land North of Langley Road is located immediately adjacent to the settlement edge of Wolverhampton and, as such, is not associated with any stand-alone settlement located within South Staffordshire. Nevertheless, Policy DS5 indicates the site as one of three sites which seeks to facilitate sustainable growth adjacent to the Black Country to support growth of their towns and cities and assist in meeting the wider unmet housing needs from the housing market area. The site benefits from good access to the suburbs of Merry Hill, Castlecroft and Upper Penn, which provide a good range of shops, including supermarkets, community facilities and health care facilities. In addition, the area includes a number of primary and secondary schools and good access to public transport. Policy DS5 indicates that the Council will work cross-boundary with infrastructure bodies and statutory parties to ensure the three sites are supported by necessary infrastructure, a notion which Richborough Estates supports.
- 5.5. The Housing Site Selection Paper (2022) includes detailed commentary on the Proposed Housing Site Allocations set out at Policy SA5. The paper concludes that the majority of the site at Langley Lane is of 'lower Green Belt harm' than the majority of other land adjacent to



the western edge of the Black Country. The site also raises a major positive effect against the Education criteria in the Sustainability Appraisal (SA),

- 5.6. The site also benefits from good access into the City of Wolverhampton and Pendeford Business Park, via the Number 4 bus service, providing regular travel between Codsall, I54, Wolverhampton and Spring Hill. Wolverhampton represents the major urban centre adjacent to South Staffordshire, with the site therefore benefits from good opportunities for access to both retail, leisure, and employment destinations.
- 5.7. Richborough Estates supports the allocation of Land North of Langley Road (adjoining City of Wolverhampton Boundary) and as set out in the information above it is clear the site is sustainably located and should remain an allocation within the Local Plan. However, objection is raised to certain elements of the Proforma for the site contained in Appendix C. In particular the reference made to hedges and trees on the boundaries being retained and providing definition between the site and the Staffordshire railway walk are not acceptable. There will be a need to create an enlarged access onto Langley Road and this may require removal of some hedgerow. In addition, the proforma seeks to encourage links to the Railway walk which will inevitably require some removal of hedgerow. Whilst it is anticipated that any hedgerow loss can easily be compensated the policy proforma and by reference Policy SA5 is objected to as currently drafted.
- 5.8. Richborough Estates supports the overall strategy of the Plan, however there is concern over the lack of safeguarded land as outline at paragraph 4.6 of this representation. As discussed previously, the GBBCHMA has a large unmet housing need and is likely to be significantly greater than that previously published. The collapse of the Black Country Plan has also led to further instability across the Black Country and wider area and Richborough Estates considers the South Staffordshire's lack of safeguarded land is misguided. The Council is encouraged to safeguard land of a variety of sizes and locations as to ensure sustainable housing growth can be achieved during the plan period.

6. Development Management Policies

Policy HC1- Housing Mix

- 6.1. Housing mix should be guided by market signals as reflected in the most up to date assessment needs. Such assessments will need to be updated over the course of the plan period.
- 6.2. The requirement that 70% of properties comprise of 3 bedrooms or less is restrictive and does not afford the flexibility expected by NPPF para 62 in order to meet the need to provide for a range of size, type, and tenure for different groups.
- 6.3. The use of the phrase 'disproportionate' in the penultimate paragraph, when describing the quantum of 4+ bedroom houses, lacks the precision and clarity needed for a Plan policy.
- 6.4. The policy should recognise that needs and demand will vary from area to area and site to site and identify that its requirements could be subject to a viability assessment, thus allowing for flexibility in its application.
- 6.5. Clarification should also be made defining 'major' development. It is noted that the Publication Plan has removed footnote 11 from the Issues and Options Plan which defined major development in accordance with the NPPF definition stating major development is "*development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more*". Whilst a definition is contained within the NPPF, the statutory definition is actually contained within the Town and Country Planning Development Management Procedure Order, which defines major development as where:
- (Ci) the number of dwellinghouses to be provided is 10 or more; or*
- (Cii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i)*
- 6.6. The text emphasised above is an important qualifier when considering whether or not a proposal constitutes major development. This qualifying text has not been carried through into the definition contained within the NPPF. Richborough Estates suggest a definition of

major development should be reintroduced into the Plan, with the DMPO definition referred to for the avoidance of doubt.

- 6.7. In light of the above, the policy is considered unsound, as it is neither justified nor consistent with national policy for the reasons set out above.

Policy HC2- Housing Density

- 6.8. Policy HC2 sets out an aim to achieve a minimum net density of 35 dwellings per net developable hectare in developments 'within or adjoining Tier 1 settlements, in infill locations within the development boundaries of other settlements in the district or in urban extensions to neighbouring towns and cities'.

- 6.9. Richborough Estates welcome the addition to the policy (set out below) which recognises that a blanket approach to density is unlikely to be effective stating:

'Where it would help to support the delivery of local services and facilities, sites will be encouraged to exceed this minimum density standard where this could be done in a manner consistent with other development plan policies, particularly those relevant to the character of the surrounding area.'

The net density on a site may go below the minimum density standard set above if to do otherwise would result in significant adverse impacts to the surrounding area's historic environment, settlement pattern or landscape character.'

- 6.10. It is also acknowledged that the Council have updated the wording of Policy HC2 to include a direction for settlements within Tiers 2-5 of the Settlement Hierarchy.

Policy HC3- Affordable Housing

- 6.11. Policy HC3 requires proposal for major residential development to provide 30% of all dwellings as affordable housing. The use of the term 'major residential development' in this context requires a definition to save confusion as to what size of development affordable housing becomes a requirement, it is presumed to be the same as that within the NPPF



Glossary. The policy also needs to ensure that evidence is provided when considering viability, especially when looking at brownfield sites.

- 6.12. The requirement for 30% affordable housing appears to be supported by the Viability Study Stage 2 Report 2022 (VA) which confirms at paragraph 3.2.7 that the proposed affordable housing figure can be appropriate for South Staffordshire, but it does highlight the challenges in delivering such a requirement and the need for higher site values to be achieved to deliver this across the board.
- 6.13. The NPPF is clear that the derivation of affordable housing policies should take account not only of need but also have regards to viability and deliverability and a differentiated policy approach should be used to the provision of affordable housing, as set out in the Viability Study.
- 6.14. The Council's position to continue with the established approach of using Section 106 planning obligations to secure the necessary infrastructure to support and mitigate the effects of new development is supported.
- 6.15. The requirement to 'pepper pot' affordable housing in clusters across the development is generally supported. However, the policy should recognise that for management purposes, Registered Providers do require a degree of clustering of affordable housing within a development and this will inform site layouts.
- 6.16. Richborough Estates supports the removal of the suggestion that grant funding for homes to be provided under the requirements of the Policy as requested within the Regulation 18 Representation.
- 6.17. The frequent reference to further guidance being provided by the Affordable Housing SPD is noted. The SPD should do no more than clarify the Local Plan policy and it is suggested that if the requirements for implementing the policy are known to need explanation now then these should either be included within the Plan now or set out within the explanatory text. The SPD is not the appropriate approach for setting new policy and or burdens on delivery, and the Plan should provide clarity at the point of adoption as to what it requires.

Policy HC4- Homes for older people and others with special housing requirements

- 6.18. Policy HC4 notes major development should:

'...clearly contributes to meeting the needs of older and disabled people.'

- 6.19. The above policy wording does not define 'older people', so it is unclear as to exactly who this Policy is targeting or who would be eligible to occupy such dwellings.
- 6.20. It stipulates that all major development should provide bungalows, age restricted single storey accommodation, sheltered/retirement living and extra care housing. The Council do not define what ages will be restricted for single storey development and as such, the policy requires clarification on this matter.
- 6.21. Such specialist housing, especially that related to extra care and retirement living, often need a minimum critical mass to be viable (for example, extra care units typically require 60+ bedrooms to be viable) and therefore the Council needs to determine, through evidence the minimum size of site which should be able to viably support the provision of such accommodation.
- 6.22. The policy then needs to provide much greater clarity on when such housing will be required as part of a major development, and to make clear that some housing types may be required on any given site.
- 6.23. It is further noted that since the Preferred Options consultation, the Plan has moved from expecting 30% all homes to be Building Regulation M4(2) compliant, it now requires 100% of all housing to be M4(2) compliant. This may bring with it issues of affordability, in a context where the access and affordability of housing is an area of wider concern.
- 6.24. The Council's Viability Study, Stage 2 (2022) acknowledges that at present Part M of the Building Regulations requires all dwellings to be built to a minimum of M4(1) with further enhanced requirements to M4(2) and M4(3) required through policy, subject to evidence of need as well as viability.
- 6.25. Currently, the requirement for M4(2) properties is optional within Building Regulations and 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". 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 justify adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case.

- 6.26. Furthermore, the HMA identifies a need for 1,783 accessible and adaptable general homes for those over 65 years and 1,235 for those under 65 years, across the Plan Period. This equates to less than 30% of the overall housing requirement to be delivered by this Plan. The updated SHMA 2022 at paragraph 8.14 concludes that it is calculated that adapted housing M4(2) will be required for 3,978 households by 2040 in South Staffordshire. It is therefore not clear how the 100% requirement within the Policy has been arrived at or how this is justified.
- 6.27. Having highlighted the above, it is also noted that the Council's Viability Study 2022 simply refers to a Government consultation² which indicates that M4(2) standards may become mandatory for all new housing.
- 6.28. That consultation was undertaken in 2020 and in July 2022 the Government published their response. This indicates that M4(2) dwellings may indeed become mandatory. This will necessitate a change to Building Regulations and statutory guidance, on which the Government will consult further in due course.
- 6.29. At the present time, though, the requirement for M4(2) dwellings is not mandatory and if the Council wish to pursue a policy requirement of 100% M4(2) dwellings then this needs to be justified, with reference to both need and cost.
- 6.30. As drafted, Policy HC4 is not sound as it is not justified.

Policy HC8 – Self-build and Custom Housebuilding

- 6.31. Policy HC8 requires sites for major residential development to "... have regard to the need on the council's self-build register and make provision of self and custom build plots to reflect this". The policy should be clear that in having regard to the Council's self-build register, it is only part 1 of the register which needs to be considered. The policy should also recognise,

² www.gov.uk: Raising accessibility standards for new homes: summary of consultation responses and government responses (July 2022)

that delivery of self-build housing on new residential sites, successfully occurs when there is a distinct phasing or grouping of plots, secured for such delivery.

6.32. Whilst Richborough Estates generally supports the concept of self-build/custom housing, they do not consider providing them as part of a larger housing development is the most appropriate solution because self/custom builders are more likely to want a more bespoke location/setting. Smaller dedicated self/custom sites are therefore a more appropriate answer.

6.33. Richborough Estates supports the position that should a proposed custom self-build plot not be sold after 12 months following active marketing, then the developer will be permitted to build out the plan as a standard property type.

Policy HC10- Design Requirements

6.34. The introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance is supported. However, a number of specific comments are made on the policy as drafted:

- The provision of tree lined streets (item c) should be subject to highway authority agreement, and where appropriate, their adoption. In Richborough Estates' experience, local highway authorities do not want trees in immediate proximity of the street due to management concerns or liabilities.
- The point on house types and tenures (item l) is repetition of policy material set out at Policy HC1 and is therefore unnecessary.

Policy HC12- Space About Dwellings and Internal Space

6.35. The continuity of existing external space and dwelling standards is generally supported although there should be a recognition that certain house types, for example Part M4(2) dwellings, should have smaller, more manageable gardens.

6.36. Richborough Estates suggests that some flexibility must be allowed in the application of the Nationally Described Space Standards (NDSS) as occasionally non-compliance with NDSS

may be appropriate for sound urban design reasons and the Policy should therefore build in some flexibility.

6.37. If the NDSS requirement is to be pursued, then the Council need to provide additional evidence for the Local Plan Examination to demonstrate that the policy is sound. National Planning Guidance Housing: optional technical standards (paragraph O20) clearly state that *“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 in 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 transition period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”*

6.38. It is clear that the introduction of the NDSS requires a Local Plan policy which has been fully evidenced, justified and viability tested. The South Staffordshire Housing Market Assessment Update 2022 (HMA) refers to the NDSS (paragraph 7.32) only in the context of assessing the need for accessible and adaptable homes. The HMA does not provide any justification or evidence for requiring NDSS in the District.

Policy HC14- Health Infrastructure

6.39. This policy refers to proposed developments causing ‘unacceptable impact’ on existing health care facilities but fails to define what level of impact is deemed unacceptable or how

that is to be measured. The policy should also acknowledge that not all residents of a development will be new to a catchment area and may indeed already be registered by the local health care provider, thereby not creating a net additional burden.

- 6.40. Careful analysis is required therefore with regard to the capacity of existing infrastructure to accommodate new patients, before reaching a conclusion as to what any CIL Regulation 122 compliant financial request might be. The requirement for CIL Reg compliance of any request should be clearly specified within policy.
- 6.41. The policy is considered unsound, as it is neither *justified nor consistent with national policy* for the reasons set out above.

Policy HC15- Education

- 6.42. Richborough Estates broadly supports the policies' objective for the improvement or construction of schools to meet the demand generated by children in new development. However, as currently written, the policy makes a blanket assumption that new education infrastructure will be required from all new development.
- 6.43. The Policy text requires further clarification as any such provision to be delivered by a S106 agreement, must have regard to the tests of CIL Regulation 122. The policy should make this explicit. In this regard, the policy should also recognise new infrastructure will be required from new development, only where it can be demonstrated that existing capacity to accommodate growth does not currently exist.
- 6.44. The policy is considered unsound, as it is neither *justified nor consistent with national policy* for the reasons set out above.

Policy HC17- Open Space

- 6.45. Whilst there is no in principle objection to the requirements of the policy or the provision of open space within developments, some clarifications are required in order to ensure that the Policy is sound.
- 6.46. The policy requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site, for example where there is already high-quality

equipped play provision in the locality it would not make sense to duplicate this provision. In addition, it is not appropriate to require open space to be centrally located on all sites as this does not take into consideration differences in development sites opportunities and constraints. It is requested that the Council amend the policy to allow policy a more flexible approach to achieve the right design solution for each site.

- 6.47. The focus of Green Infrastructure provision should be based on quality rather than quantity or 'useability' and the exclusion of small incidental green infrastructure (GI) without a clear recreational purpose from on-site open space provision is not supported. The policy text cites landscape buffers as an example of incidental GI which may be excluded. This is not appropriate as landscape buffers can be of a significant size and clearly contribute towards open space provision on a site. They should therefore be included in these calculations. Planning Practice Guidance acknowledges that '*Green infrastructure can embrace a range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals, and other water bodies*' (Paragraph 004 - ref ID: 8-004-20190721).
- 6.48. The policy should therefore be revisited and clarified, with clear reference to national guidance ensure that open space and green infrastructure is properly and clearly defined and to recognise the contribution that a range of spaces and uses will bring to a development.
- 6.49. The policy as drafted is unsound as it is *inconsistent with national policy* and is *unjustified* for the reasons set out above.

Policy HC18- Sports facilities and playing pitches

- 6.50. Policy HC18 is informed by the playing pitch and sport facilities assessments produced by KKP in 2020 and is broadly supported.
- 6.51. It is noted that further guidance on the procedure for determining provision required from new development will be set out in an Open Space, Sport, and Recreation SPD. However, the policy requires all new major residential development to contribute towards sports facilities and playing pitches, but no further quantitative details are provided to set out the detail of what will be expected within the Publication Plan.

- 6.52. The requirements for playing pitches are set out in the Future Housing Growth and Playing Pitch Requirements Topic Paper (November 2022). The requirements in regard to the Land North of Langley Road (adjoining City of Wolverhampton Boundary) are considered broadly appropriate and is supported. It would be more appropriate for SSDC to define standards expected from development as part of policy (as per the open space standard defined by Policy HC17, for example). This approach provides greater certainty in respect of the infrastructure delivery requirements expected from sites, which ultimately impacts upon their viability. The level of provision expected, and the associated viability implications should be considered within both the Infrastructure Delivery Plan and Viability Assessment.
- 6.53. The requirements of delivering sports facilities and playing pitches through on-site provision or S106 contributions is only one element of the package of things sites will need to provide and the Council must ensure the delivery of all potential obligations are taken into account for both on and off-site provision to support the soundness of the Plan at examination.

Policy EC3- Inclusive Growth

- 6.54. The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential dwellings is not supported. Whilst the benefits of such plans are acknowledged, it is considered more appropriate to implement them on a site-by-site basis, dependent on local circumstances and the labour market and such a requirement can be sourced by condition. This is especially important in the context of modular methods of construction inevitably increasing in the coming years, probably sourced from outside South Staffordshire.
- 6.55. If the Policy is to be found sound it should be amended to incorporate flexibility and allow for Employment and Skills Plans to be requested on a site-by-site basis, where appropriate. In so doing the relevant criterion for requesting such policies must be clearly defined and set out within the policy in order to ensure the policy is justified.

Policy EC11- Infrastructure

- 6.56. Policy EC11 commits SSDC to work with and support infrastructure providers and also offer support for the delivery of infrastructure. This is broadly supported, but any assessment of

cumulative impact and mitigation requested must be proportionate and CIL Regulation 122 compliant. The policy should be explicit that this is the case.

- 6.57. The policy is considered unsound, as it is neither *justified* nor *consistent with national policy* for the reasons set out above.

Policy NB2- Biodiversity

- 6.58. Richborough Estates are supportive of the need to address net losses to Biodiversity, through the provision of enhancement to deliver an overall net gain. The Council's policy requirement to deliver 10% Biodiversity Net Gain, reflects that of the Environment Act and is not objected to. Indeed, it reflects one of the core principles of the NPPF to conserve and enhance the natural environment.

- 6.59. In delivering net gain, however, the policy needs to provide as much flexibility as possible. The key test of policy is whether the 10% BNG is being delivered, not necessarily the specific method by which it is delivered. It is important that the way in which these 'net gains' are calculated is given careful consideration and that a pragmatic view is taken in terms of biodiversity enhancements, where there are clear landscape and habitat improvements, rather than being wholly reliant on the output of rigid calculator, in particular where this would impede the delivery of much needed housing.

- 6.60. In this regard, certain aspects of the policy would benefit from clarification. Subsection a) for example, discusses 'maintaining and enhance existing habitats' on development sites as a priority. It has to be questioned, however, that where sites are allocated for delivery, whether such a goal is achievable. Certainly, it is good practice to retain where possible, hedgerows, mature trees, and other key ecological assets. However, for the policy to indicate that habitat protection on site is a priority, over matters such as high-quality urban design, or delivery of any of a raft of other local plan policies, gives this specific element of policy delivery an undue prominence.

- 6.61. The policy would benefit from some limited re-wording (replace 'as a priority' with 'where possible' for example) to provide a more balanced and practical response to achieving the necessary 10% BNG delivery.

Policy NB4- Landscape Character

6.62. Policy NB4, would benefit to an amendment in the text, which reflects the comments made on Policy NB2 above. As drafted, the second paragraph states:

"All trees, woodland, and hedgerows should be protected and retained"

6.63. Whilst it is appreciated that the following sentence identified that should a loss be required, appropriate mitigation measure must be delivered by the developer, the above sentence should be amended to the following:

"All trees, woodland and hedgerows should be protected and retained wherever possible"

Policy NB6– Sustainable Construction

6.64. Given that the Environment Act 2021 has recently been made into law, it needs to be made clear that this policy reflects the Act and its purpose and that it repeats the laws written within it.

6.65. Concern is raised with some of the technical detail raised in Policy NB6. Clause 3 regarding embodied carbon, includes the statement:

'Developers must ensure that a recognised monitoring regime is put in place to allow the assessment of energy use, indoor air quality, and overheating risk for 10% of the proposed dwellings (of the council's choosing) for the first five years of their occupancy and ensure that the information recovered is provided to the applicable occupiers and the planning authority.'

6.66. Whilst Richborough Estates fully appreciate the value of Whole Life-Cycle Carbon assessments and the need for some form of post construction, pre-occupation assessment, there is concern raised about this policy. Firstly, once sold the properties will be owned by the purchasers and their mortgagees. There are issues of data protection and consent surrounding the recording and sharing of energy use, air quality and overheating risk data with a third party, in respect of properties that the developer will not own.

6.67. Secondly, with the above in mind, it must be noted that whilst it may be possible to introduce some form of data gathering within the homes, once sold and the responsibility of a third



party, it may become difficult to ensure that all of the devices installed for monitoring will remain active for the entire period.

- 6.68. There is no evidence to suggest that the Council have considered or addressed the GDPR implications of this requirement, its effect on 'mortgage-ability', or indeed its effect on sales values. Presumably properties which are wired to share private individual's lifestyle data, would be less attractive in the marketplace, and that would be reflected in reduced sales values. This element of the possible is not practical to be delivered in the form proposed, and is therefore considered unsound, on the grounds of being neither justified nor consistent with national policy for the reasons set out above.
- 6.69. Further, the requirement of the policy for developments to demonstrate a minimum 63% reduction in carbon emissions, with each dwellings achieving at least a 10% improvement on the Building Regulations Part L 2021 Target for Fabric Energy Efficiency, plus post development requirements to achieve as least zero regulated carbon across the scheme is unnecessary. with the improved Part L Building Regulations and emerging Future Homes Standards we do feel that this may be an unnecessary early step however would support the introduction of early improvements once further details are available within the market to achieve these high standards of construction, without unintended consequence of increased air tightness/efficiency is known. We don't feel that the Council does not need to set local energy efficiency standards to achieve the shared net zero goal.
- 6.70. Having worked in areas of water stress and the emerging requirement for water efficiency playing a bigger part in other areas of construction, we would support the 110l/p/d target.

7. Sustainability Appraisal

7.1. The Publication Plan is supported by a Sustainability Appraisal ('the SA'), prepared by Lepus Consulting³. The purpose of the SA is stated as being to appraise the sustainability performance of all potential site allocations for development. The potential sites are assessed in relation to each of the stated objectives in the SA Framework as follows:

- **SA Objective 1. Climate change mitigation:** Minimise the Plan area's contribution to climate change.
- **SA Objective 2. Climate change adaptation:** Plan for the anticipated impacts of climate change.
- **SA Objective 3. Biodiversity and geodiversity:** Protect, enhance, and manage the flora, fauna, biodiversity, and geodiversity assets of the district.

SA Objective 4. Landscape and townscape: Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.

- **SA Objective 5. Pollution and waste:** Reduce waste generation, increase the reuse of, and recycling of, materials whilst minimizing the extent and impacts of water, air, and noise pollution.
- **SA Objective 6. Natural resources:** Protect, enhance, and ensure the efficient use of the district's land, soils, and water.
- **SA Objective 7. Housing:** Provide a range of housing to meet the needs of the community.

³ Sustainability Appraisal of the South Staffordshire Local Plan Review – Regulation 19 SA Report Volume 1 to 3, October 2022

- **SA Objective 8. Health and wellbeing:** Safeguard and improve the physical and mental health of residents.
- **SA Objective 9. Cultural heritage:** Conserve, enhance and manage sites, features, and areas of historic and cultural importance.
- **SA Objective 10. Transport and accessibility:** Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.
- **SA Objective 11. Education:** Improve education, skills, and qualifications in the district. Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.
- **SA Objective 12. Economy and employment:** To support a strong, diverse, vibrant, and sustainable local economy to foster balanced economic growth.
- **SA Objective 13. Equality:** Reduce poverty, crime and social deprivation and secure economic inclusion.

7.2. The SA also appraises the draft development management policies and their likely outcomes.

7.3. The significance of effects is scored as follows:

Significance	Definition (Not Necessarily Exhaustive)
<p>Major Negative --</p>	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Permanently degrade, diminish, or destroy the integrity of a quality receptor, such as a feature of international, national, or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or

	<ul style="list-style-type: none"> Contribute to a cumulative significant effect.
Minor Negative -	The size, nature and location of development proposals would be likely to: <ul style="list-style-type: none"> Not quite fit into the existing location or with existing receptor qualities; and/or Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse
Minor Positive +	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> Improve undesignated yet recognised receptor qualities at the local scale; Fit into, or with, the existing location and existing receptor qualities; and/or Enable the restoration of valued characteristic features.
Major Positive ++	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; Restore valued receptors which were degraded through previous uses; and/or Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national, or regional designation.

Table 7.1 Guide to scoring significance of effects

7.4. The SA represents an update to previous iterations of the SA which have supported previous consultation versions of the LPR.

Land North of Langley Road (adjoining City of Wolverhampton boundary)–

Site Ref: 582

- 7.5. Land North of Langley Road is assessed within the SA as 'Land off Langley Road' under site reference: 582. This includes an assessment of the nature and magnitude of the impact of the development post-mitigation.
- 7.6. This assessment is reproduced in Figure 7.1 below.

Site Reference	1 Climate Change Mitigation	2 Climate Change Adaptation	3 Biodiversity & Geodiversity	4 Landscape & Townscape	5 Pollution & Waste	6 Natural Resources	7 Housing	8 Health & Wellbeing	9 Cultural Heritage	10 Transport & Accessibility	11 Education	12 Economy & Employment
582	+/-	+	0	--	-	-	+	-	0	-	++	-

Figure 7.1: Significance of effects post-mitigation, Site Ref: 582

- 7.7. Richborough Estates supports the above scoring overall but disputes the finding that developing the Site would result in a Major Negative impact upon landscape and townscape.
- 7.8. The SA sets out that the majority of the site is of lesser Green Belt harm (moderate-high) than the majority of other land in this broad location.
- 7.9. In respect of other aspects, the site was only found to have 'moderate' landscape sensitivity or a 'minor negative' impact on landscape character, views from the public right of way network, views for local residents, urbanisation of the countryside and coalescence.
- 7.10. The finding that the site would have a Major Negative impact upon landscape and townscape accordingly appears to be based upon the finding that the site could result in an unsustainable pattern of development. Richborough Estates opposes this view given the assessment later states that the site is considered to perform better than other sites options and could deliver the Council's preferred spatial strategy.
- 7.11. The SA concludes that having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.

8. Land North of Langley Road (adjoining City of Wolverhampton)

- 8.1. 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 Site Selection Methodology for Preferred Options document (Appendix 6 of Spatial Housing Strategy & Infrastructure Delivery consultation).

Site Description

- 8.2. Richborough Estates controls Land North of Langley Road, Wolverhampton. The site adjoins the western edge of the Black Country conurbation to the north of Langley Road. The Staffordshire Railway Walk lies to the north, with existing residential properties located beyond. Existing residential properties also lie to the east and south of the site, whilst an electricity distribution substation and agricultural fields are located to the west.
- 8.3. The site extends to approximately 19 hectares and comprises a number of fields within agricultural use and land associated with a derelict plant nursery.
- 8.4. The site is located within Flood Zone 1 (the area at least risk from flooding). The site is generally flat with a gradual rise to the centre of the site.
- 8.5. The site is currently accessed from Langley Road to the south, via the access associated with the former plant nursery. A separate access off Langley Road also exists which doubles as an access for purposes of maintaining the substation.
- 8.6. Along the western boundary a planning application (ref: 21/00440/FUL) was approved at appeal in December 2021 for construction, management and operation of a battery based electrical storage scheme. It has been noted by Richborough Estates that local residents have raised concern regarding the proposed allocation at Land North of Langley Road in relation to this battery storage scheme. In regard to ecology and noise the appeal Inspectors report states at paragraph 19 that:

'With regards to ecology and noise, evidence in the form of an Ecological Impact Assessment and Noise Assessment were submitted with the appeal. These detail how the development

would be acceptable in terms of its impact on biodiversity and nearby residents. The Council's Ecologist and Environmental Health team do not object to the proposed development. As such, I consider that, subject to the addition of conditions relating to biodiversity and noise levels and mitigation, that the proposed development would not have a harmful impact in relation to these matters.'

- 8.7. The appeal decision continues stating they had 'not been presented with evidence that it would lead' them 'to believe that' the battery storage facility would be unsafe. As such, the appeal was granted. The proposed allocation for residential development is therefore not incompatible at this location. Richborough Estates would also like to emphasise that any planning application put forward at land north of Langley Road would be accompanied by a new noise assessment and will include any required mitigation measures to ensure future and existing residents are not impacted upon by the battery storage facility.

Proposed Development

- 8.8. An Illustrative Masterplan is included at Appendix 1 to this representation, which demonstrates how the site is capable of accommodating 390 new dwellings, as well as associated public open space, drainage, play areas and landscaping.

Green Belt

- 8.9. In August 2022, SSSDC published the South Staffordshire Green Belt Study Addendum. The reports are an addendum to the South Staffordshire Green Belt Study (2019) and provides additional sub-parcel assessment and amended maps and plans to reflect the addition of a sub-parcel.
- 8.10. The South Staffordshire Green Belt Study was published in July 2019, alongside a study employing the same methodology for the Black Country authorities. The study forms an important piece of evidence for the review of the South Staffordshire Local Plan.
- 8.11. The Green Belt Study comprised of two parts; the first was to assess 'strategic variations' between the contribution of land to the five purposes of the Green Belt, whilst the second includes a more focused assessment of the potential 'harm' of removing land from the Green Belt.

8.12. Alongside the Green Belt Study, a Stage 3 assessment involved undertaking a landscape sensitivity assessment in order to assess the sensitivity of land within the South Staffordshire to housing and employment development. Whilst there is a relationship between landscape sensitivity and Green Belt contribution/harm in that physical elements which play a role in determining landscape character, there are fundamental distinctions in the purposes of the two assessments. As such, the findings of the Stage 3 landscape sensitivity assessment for South Staffordshire and the Black Country are presented in a separate document (Landscape Study 2019) and is considered later in this representation.

Green Belt Purposes

8.13. The National Planning Policy Framework (NPPF) (2021) states that the Green Belt should serve the five following purposes:

- To check the unrestricted sprawl of large built-up area;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Land off Langley Road; Contributions to Green Belt Purposes

8.14. The Green Belt Study 2019 shows Land off Langley Road, Wolverhampton, as falling within Green Belt Sub-Parcel reference: Sub-Parcel Ref S59B – ‘*Spring Hill [and adjacent land]*’, which is identified as making the following contribution to the five purposes of the Green Belt:

GB Purpose	Assessment	Rating
PI: Checking the unrestricted sprawl	Land is adjacent or close to the large built-up area, contains no or very limited urban development,	Strong

of large built-up areas	and has strong openness. It retains a relatively strong relationship with the wider countryside.	
P2: Preventing the merging of neighbouring towns	Land plays no significant role due to the distance between the West Midlands conurbation and Bridgnorth, its nearest neighbouring town.	Weak / No contribution
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (i.e., an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	Strong
P4: Preserve the setting and special character of historic towns	Land does not contribute to the setting or special character of a historic town	Weak / No contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong

Table 8.1: Land Parcel S59B Contribution Towards Green Belt Purposes

8.15. The Study at Appendix 3 goes on to identify differing levels of harm if land within the parcel was to be released from the Green Belt for development. Should any 'uncontained' land within the parcel be released for development, the resulting harm would be 'high'. In respect of 'land north of housing on Langley Road', the resulting harm would be 'moderate-high', stating:

"The sub-parcel makes a strong contribution to checking the sprawl of the West Midlands conurbation and to preventing encroachment of the countryside. This part of the sub-parcel is tightly contained by outcrops of the settlement of Wolverhampton. Release of this land would therefore have a negligible effect on the Green Belt."

8.16. This is supported within the 2022 Green Belt Exceptional Circumstances Topic Paper.

Harm Ratings Overview Map of Land within Sub-Parcel

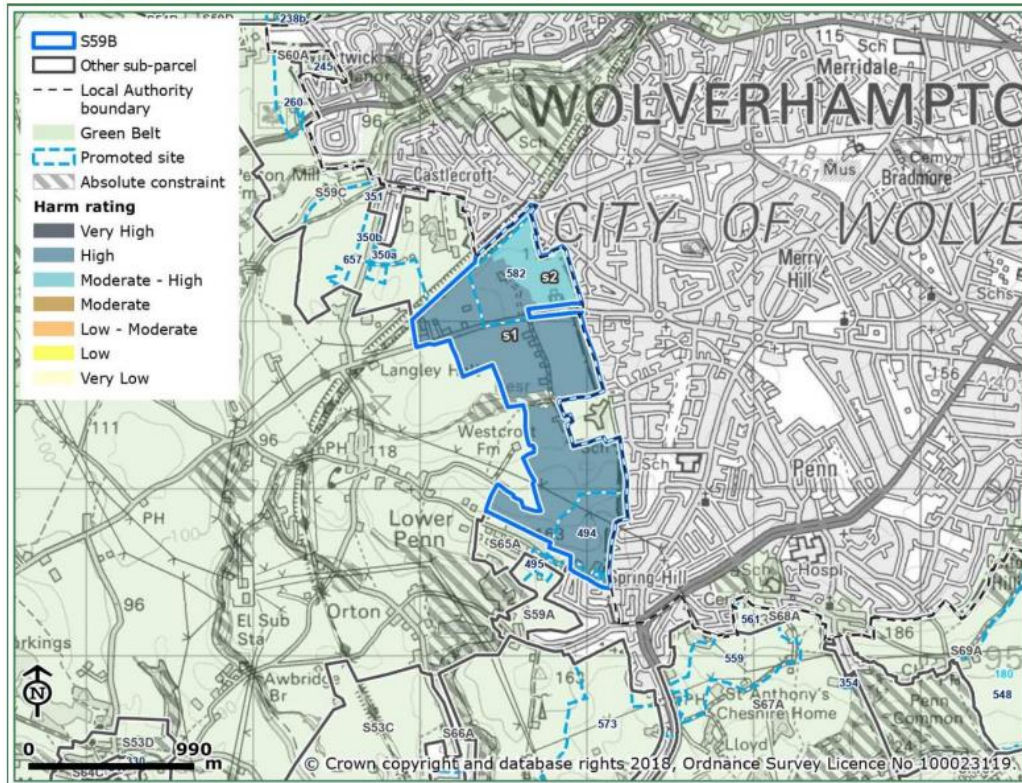


Figure 8.1: Harm Ratings for Land Parcel S59B

8.17. Whilst the conclusions of the above assessment are noted, it remains that Green Belt Sub-Parcel ref: S59B extends significantly beyond Land off Langley Road, which itself serves a reduced function against the five purposes of the Green Belt, as assessed below.

To Check the Unrestricted Sprawl of Large Built-Up Areas

8.18. The site relates well to the edge of the built form of the West Midlands conurbation, being enveloped by existing built features on three of four sides. Specifically, the site is bounded by the South Staffordshire Railway walk to the north, beyond which lies residential development. Bhylls Acre Primary School and further residential properties lie to the east, whilst residential properties also lie to the south of the site on Langley Road.

- 8.19. An existing electricity substation is also sited immediately adjacent to a section of the site's western boundary, representing an urbanising feature beyond the currently settlement edge. The land west of the substation is also to be developed as a battery storage facility, following a grant of planning at appeal in December 2021. The battery storage development and substation site in combination will in effect extend the urban edge of the conurbation beyond the Langley Road site. The additional urbanising effect of these developments further limits the impact of the proposed allocation in terms of impact on the landscape and in regard to green belt issues.
- 8.20. Furthermore, the site's western boundary is comprised of intermittent mature trees and hedgerow, which could be strengthened in order to provide an enduring future Green Belt Boundary, level with the surrounding settlement edge to the north and south. The release of the site for development would serve to consolidate and 'round-off' the settlement edge in this location.
- 8.21. It is therefore felt that the site makes a 'moderate' contribution to checking the unrestricted sprawl of large built-up areas, rather than the 'strong' contribution identified within the Green Belt Study.

To Prevent Neighbouring Towns from Merging into One Another

- 8.22. The site plays no significant role in preventing neighbouring towns from merging into one another and therefore makes a 'weak/no' contribution to preventing neighbouring towns from merging into one another.
- 8.23. Richborough Estates accordingly agrees with the conclusions of the Green Belt Study in this regard.

To Assist in Safeguarding the Countryside from Encroachment

- 8.24. Whilst the Site itself site contains some characteristics of open countryside, such as an absence of built development, it remains that the site is surrounded by existing built form on three of its four sides, with the addition of the electricity substation partly forming the fourth site boundary. The site is accordingly strongly influenced by existing urbanising features.



8.25. Furthermore, the site has durable defensible boundaries that are afforded clear physical enclosure from the wider Green Belt. The development of the site would present the opportunity to further strengthen these boundaries, thus safeguarding the countryside from future encroachment.

8.26. It is therefore considered that the site makes a 'moderate' contribution to assisting in safeguarding the countryside from encroachment, rather than the 'strong' contribution identified within the Green Belt Study.

To Preserve the Setting and Special Character of Historic Towns

8.27. Richborough Estates agrees with the conclusions of the Green Belt Study, that the site makes a 'weak/no' contribution to preserving the setting and special character of historic towns.

To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and other Urban Land

8.28. Whilst it is acknowledged that all Green Belt land contributes towards encouraging the recycling of derelict and other urban land, the site and immediate area does not contain significant areas of brownfield land and would therefore not prejudice the redevelopment of urban land in this area. As such, the release of the site from the Green Belt and allocation for residential development would not significantly prevent the recycling of derelict land and other urban land.

8.29. It is therefore considered that the site makes a 'moderate' contribution to this purpose of the Green Belt, rather than the 'strong' contribution identified within the Green Belt Study.

Summary of Green Belt Purposes

8.30. Overall, it is therefore considered that Land off Langley Road, Wolverhampton, makes a reduced contribution to the five purposes of the Green Belt than that identified within the Green Belt for Green Belt Sub-Parcel ref: S59B. This contribution is summarised in the table overleaf:

GB Purpose	Previous Rating	Revised Rating
------------	-----------------	----------------

P1: Checking the unrestricted sprawl of large built-up areas	Strong	Moderate
P2: Preventing the merging of neighbouring towns	Weak / No contribution	Weak / No contribution
P3: Safeguarding the countryside from encroachment	Strong	Moderate
P4: Preserve the setting and special character of historic towns	Weak / No contribution	Weak / No contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	Strong	Moderate

Table 8.2: Land off Langley Road, Green Belt Assessment

Green Belt Harm

- 8.31. Given the reduced impact upon the five purposes of the Green Belt set out above, is contented that the Green Belt harm identified within the Study should be reduced from 'moderate-high' to 'low-moderate'.
- 8.32. It is the view of Richborough Estates that the site makes a moderate contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. The released of the site for development would provide the opportunity to strengthen the Green Belt boundary in this location, as well as rounding off the existing settlement edge. The site would form a logical location for the expansion of the settlement edge, and new Green Belt boundaries could be readily drawn and strengthened without compromising the functions of the designation.
- 8.33. Given the reduced impact upon the five purposes of the Green Belt, it is contented that the Green Belt harm identified within the Study should be reduced from 'high' to 'low-moderate'.

Landscape Sensitivity

- 8.34. South Staffordshire District Council has produced a Landscape Study (2019) which forms part of the Local Plan Review evidence base. Land off Langley Road falls within Landscape Parcel Reference: SL28, which falls within the 'Settled Farmlands' Landscape Character Type. The landscape area follows the western settlement edge of the outskirts of Wolverhampton

from near Penn Fields School to the A454. The area includes parts of the River Stour, the Staffordshire and Worcestershire Canal and the disused railway line which is now a recreational route.

8.35. An extract of the Council's Appraisal of Landscape Sensitivity is included below:

Characteristic / Attribute	Lower Sensitivity to Development	Moderate Sensitivity to Development	Higher Sensitivity to Development
Scale		Fields are a mixture of small and medium scale, many with intact hedgerows and hedgerow trees which contribute to the human scale. Some fields have been subdivided by post and wire and tape for horse paddocks. There are also a number of sports pitches.	
Landform	There is little topographical variety in the proposed area with elevation ranging from 90m near the River Stour to a high point of 125m AOD in the east.		
Landscape pattern and time depth		There has been relatively little change in field pattern since the late 19th century and fields are likely to be of post-medieval origin (piecemeal enclosure) except for areas in the north near A454 where fields enclosed in the 18th/19th centuries are smaller and irregular.	
'Natural' character		Limited areas of semi-natural habitat include priority habitat	

		deciduous woodland along the disused railway line which is designated as a local nature reserve (LNR) South Staffordshire Railway Walk and woodland around Castlecroft House. Valued natural features include mature hedgerow trees, including oaks.	
Built character	Few heritage assets or historic features important to landscape character. Built character is mostly modern with properties along Drivefields Road and Langley Road. The presence of an electricity sub-station and sports grounds with associated infrastructure negatively influences landscape character.	Local heritage features include the Wolverhampton to Kingswinford Railway and the Staffordshire and Worcestershire Canal.	
Recreational character	.	Recreational opportunities include public footpath routes and traffic free cycle routes along the canal towpath and the railway walk.	
Perceptual aspects		The area has a sense of rural character and tranquillity, although this is impacted by signs of human activity and modern development, such as the overhead power line and larger scale development	

		(tower blocks and a school) on the edge of Wolverhampton.	
Settlement setting		The area provides a rural backdrop to the surrounding settlements, including the village of Lower Penn and the extensive suburban fringe of Wolverhampton.	
Visual prominence	The area is not visually prominent within the wider landscape as it has limited topographical variation.		
Inter-visibility with adjacent designated landscapes or promoted viewpoints	Little or no inter-visibility with adjacent sensitive landscapes or marked viewpoints.		
Landscape Sensitivity Judgement	Based on the combination of landscape attributes outlined above, the area is judged to have an overall moderate sensitivity to residential development.		Moderate

8.36. The Study concludes that Landscape Parcel SL28 (which encompasses the Land off Langley Road) is considered to have a 'moderate' overall sensitivity to residential development, as identified on Figure 8.1 below.

Landscape Sensitivity Rating

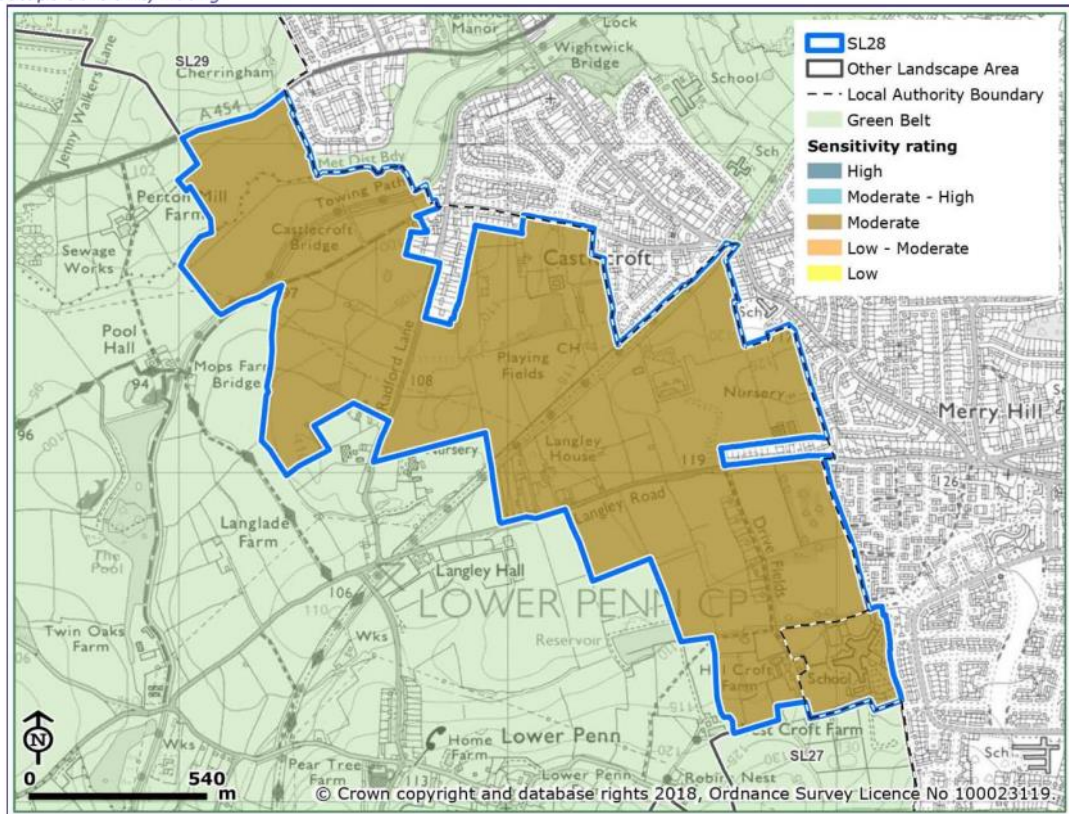


Figure 8.3: Landscape Sensitivity Rating Parcels SL28

- 8.37. The findings of the Landscape Study are not necessarily disputed by Richborough Estates. However, given that the site is recessed within the existing urban edge of the West Midlands conurbation, it is considered that the site performs better in landscape terms than the wider landscape parcel.
- 8.38. Any development that takes place on the site would be focused towards the eastern edge, adjacent to the existing built form of the West Midlands conurbation. Reduced densities and open space would be located to the western edge of the site, providing a transition between built form and the countryside.
- 8.39. The development of the site also represents an opportunity to strengthen the existing boundary to its western edge. This would provide an improved landscape buffer and restrict views of the site from the wider countryside.

Sustainability

- 8.40. South Staffordshire District Council has prepared a Rural Services and Facilities Audit (2021) ('the RSFA') which presents evidence on the relative level of services and facilities present in settlements within South Staffordshire.
- 8.41. The RSFA identifies five key indicators to compare the relative sustainability of settlements within the District as follows:
- Access to food stores;
 - Diversity of accessible community facilities/services;
 - Access to employment locations;
 - Access to education facilities; and
 - Public transport access to higher order services outside of the village.
- 8.42. Land off Langley Road is located immediately adjacent to the settlement edge of Wolverhampton and, as such, is not associated with any stand-alone settlement located within South Staffordshire.
- 8.43. Nevertheless, the site benefits from good access into Wolverhampton including the suburbs of Merry Hill, Castlecroft and Upper Penn, which provide a good range of shops, including supermarkets, community facilities and health care facilities. In addition, the area includes a number of primary and secondary schools and good access to public transport. The Number 4 bus service provides regular travel between Codsall, I54, Wolverhampton and Spring Hill. Wolverhampton represents the major urban centre adjacent to South Staffordshire, with the site therefore benefits from good opportunities for access to both retail, leisure, and employment destinations.
- 8.44. The site is therefore sustainably located.

Impact on the Historic Environment

- 8.45. There are no statutory designated heritage assets within the immediate vicinity of the site. However, there is a WWII gun battery non statutory heritage asset within the site. This has been taken into account in the proposed masterplan and can be retained in an area of open space. This reflects the approach set out in Appendix C of the LP.
- 8.46. The nearest designated heritage assets to the site comprise a Grade II Listed building known as 'The Buttery', located on Castlecroft Gardens, as well as Castlecroft Gardens Conservation Area. These assets are located approximately 350m from the north-eastern site boundary, with existing built form located in the intervening distance.
- 8.47. Given the distance between the site and these assets, it is considered likely that the development of the site will not affect the significance of these designated heritage assets, nor their settings. A detailed heritage and archaeological assessment would support any planning application.

Highways (Accessibility to the Site)

- 8.48. The site is sustainably located, and a range of local retail, leisure and employment facilities are accessible by modes other than the private car.
- 8.49. Vehicular site access can be provided via new point of access to Langley Road, in accordance with relevant local and national design guidance, ensuring there would be no material impact on highway safety or highway capacity as a result.

Impact upon the Natural Environment

- 8.50. The South Staffordshire Railway Walk located to the northern site boundary is designated as a Local Nature Reserve. Any development of the site would accordingly be required to take this into consideration, including incorporating any necessary development offsets to minimise impacts upon wildlife.
- 8.51. No other Local Nature Reserve, SSSI or other land-based designations exist in the vicinity of the site.

Recreation and open space

8.52. The site can provide new open space on site and deliver new play facilities for residents. In addition, Richborough Estates are looking to secure other opportunities to improve recreation provision, and this may include a link to the Railway Walk to the west. Such improvements could also form part of the Green Belt compensation improvements which the allocation of the site could deliver

Suitability

8.53. The information set out above demonstrates that Land off Langley Road is a suitable site for development.

Deliverability

8.54. There is an agreement in place between the landowner and Richborough Estates to facilitate the development of the site.

8.55. There are no constraints likely to render the site undeliverable in the Plan period. The site is available now.

8.56. There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the impacts of the development of the site can be mitigated and, in many cases, a positive outcome can be achieved.

8.57. The site is deliverable and immediately available and subject to allocation, could deliver homes and associated community early in the Plan period.



9. Conclusion

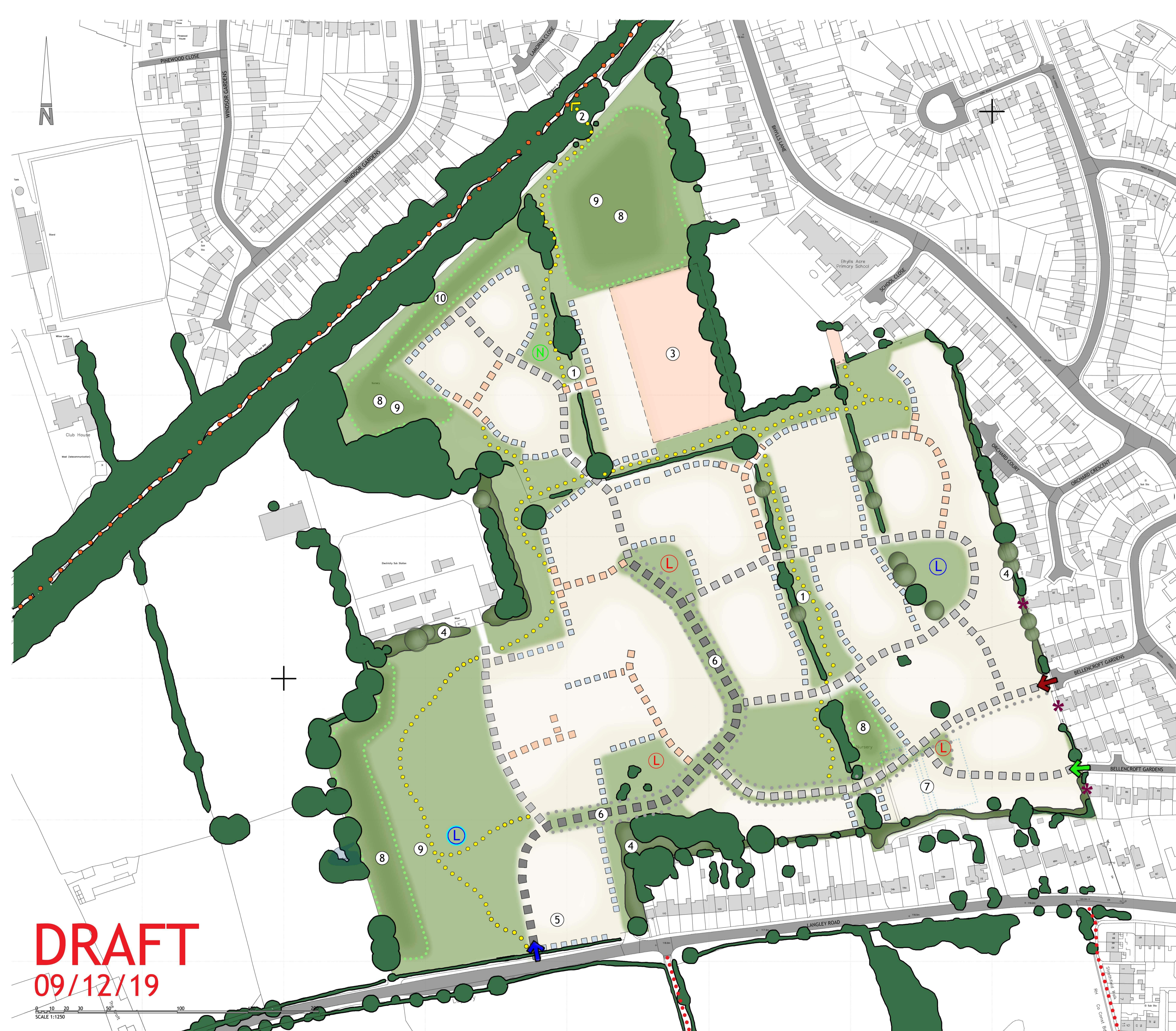
- 9.1. This representation is made by Pegasus Group on behalf of Richborough Estates Limited to the South Staffordshire Local Plan Review, Publication Plan (Regulation 19). This representation relates to land off Langley Road, Wolverhampton, which Richborough Estates is promoting for residential development.
- 9.2. Richborough Estates is supportive of the Local Plan Review undertaking but has made specific comments on key matters associated with the Local Plan Review. These include on the amount of land identified for housing, Green Belt land release and safeguarded land, on some development management policies, and, on site specific matters associated with the Council's consideration and evidence base on the land North of Langley Road (adjoining City of Wolverhampton).
- 9.3. Richborough Estates considers that their land interests at land North of Langley Road (adjoining City of Wolverhampton) are a suitable and deliverable site for residential development, subject to release from the Green Belt and that the site could deliver development to meet the identified housing needs within the Plan period.



Appendix 1

Illustrative Masterplan

Appendix 2



NOTES

- Contractors must check all dimensions on site. Only figured dimensions are to be worked from. Discrepancies must be reported to the Architect or Engineer before proceeding. © This drawing is copyright.
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KEY

- ① Green corridor links incorporating existing trees and hedges
 - ② Possible connection to South Staffordshire Railway Walk
 - ③ Potential school expansion site
 - ④ Existing landscape to be retained and enhanced where necessary
 - ⑤ Continuation of existing residential street
 - ⑥ Principal residential street
 - ⑦ Line of existing derelict nursery buildings to be demolished
 - ⑧ Proposed surface water attenuation areas
 - ⑨ Opportunities for habitat enhancement
 - ⑩ Protection buffer to designated nature conservation site
- Ⓛ Proposed 'Local Area for Play' (LAP)
 - Ⓛ Proposed 'Local Equipped Area for Play' (LEAP)
 - Ⓛ Proposed Enhanced LEAP
 - Ⓝ Proposed Natural Play Area
- Existing South Staffordshire Railway Walk
 - Existing Public Footpaths
 - ➡ Proposed site entrance off Langley Road
 - ➡ Proposed emergency access from Bellencroft Gardens
 - ➡ Potential emergency access from Bellencroft Gardens
 - ▬ Proposed primary residential access road
 - ▬ Proposed secondary residential access road
 - ▬ Proposed shared surfaces
 - ▬ Proposed private driveways
 - Proposed black-top footpath
 - Proposed informal pathways through open space
 - ✳ Layout to respond to any existing habitable room windows' outlook

Illustrative Net Developable Area = 9.45 Ha (23.35 Acres)
Illustrative Open Space Area = 5.72 Ha (14.13 Acres)

REV	DESCRIPTION	DRN	CHD	DATE
PRELIMINARY	INFORMATION			TENDER
CONSTRUCTION	AS BUILT			

SCALE 1:1250 @ A1 DATE Dec 2019

DRAWN CM CHK GS

DRAWING NO. 18418/ 1004 REV -

TITLE **Langley Road
Wolverhampton**

DETAILS **Concept Layout**

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 Architecture | Engineering | Planning | Surveying

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PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS DRAWING

DRAFT
09/12/19

SCALE 1:1250



Appendix 2

Vision Document



LANGLEY ROAD
WOLVERHAMPTON

DEVELOPMENT VISION

Prepared by Pegasus Group on behalf of Richborough Estates
DECEMBER 2022 | P19-0658_01

**PEGASUS
GROUP**

 **Richborough
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Prepared by Pegasus Group
on behalf of Richborough Estates.
December 2022. Project code P19-0658. Document ref P19-0658_01.
Contact: Ellie Liggins-Hughes

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SURROUNDINGS
OVERVIEW

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ENVIRONMENTAL
CONSIDERATIONS

PAGE 41

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VISION FOR LAND
AT LANGLEY
ROAD

PAGE 51

6

SUMMARY &
CONCLUSIONS

THIS DOCUMENT IS DESIGNED TO BE VIEWED AS A3 DOUBLE SIDED



“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.”

Para 126, NPPF 2021

1

INTRODUCTION & DOCUMENT PURPOSE



INTRODUCTION & DOCUMENT PURPOSE

INTRODUCTION

1.1 The land at Langley Road represents a logical and appropriate extension to Wolverhampton. The site is sustainable, is well-located to a wide range of existing services and facilities and offers an opportunity to deliver new homes alongside supporting infrastructure.

RICHBOROUGH ESTATES

1.2 Richborough Estates is a responsible and specialist strategic land promotion business founded with the aim of working in partnership with landowners. Our projects are located throughout the country ranging from residential schemes of around 50 dwellings to large urban extensions (including sites within the Green Belt), Retail, Commercial and Extra Care facilities.

1.3 Richborough Estates oversees the entire planning process from start to finish and works closely with local communities, Planning Officers and key stakeholders, to create mutually beneficial schemes. Richborough is seeking to apply this approach to the proposed development which is the subject of this Promotional Document.

1.4 Richborough Estates has an interest in the land at Langley Road. The extent of land controlled by Richborough is shown edged red on the Site Location Plan on page 6 of this document.

DOCUMENT PURPOSE

1.5 South Staffordshire Council is currently in the process of reviewing their Local Plan to identify and direct growth within the District to 2039. This will include consideration of an appropriate housing requirement and a spatial strategy for distributing growth, informed by an updated settlement hierarchy. This Promotional Document demonstrates that the site at Langley Road will form a logical extension to Merry Hill, Wolverhampton and that exceptional circumstances exist to justify its removal from the Green Belt.

1.6 This Promotional Document presents an analysis of the site and its surroundings and sets out in detail the case for the removal of the site from the Green Belt. This includes a review of the current and emerging planning policy position and an assessment of the site against the five purposes of the Green Belt contained in the National Planning Policy Framework ("The Framework").

1.7 The document also sets out the Vision for the site, informed by a consideration of the constraints and opportunities and an Indicative Masterplan demonstrating how the Vision can be achieved through a well-designed scheme. The document concludes with a concise summary of the site, the proposed development and its key benefits.

1.8 Overall, this Promotional Document presents a sustainable site to support the site's future allocation through the Local Plan Review process and promotes its release from the Green Belt.

1.9 This document has been prepared with input from the following Consultant Team:

Planning:
Pegasus Group



Urban Design:
Woods Hardwick Ltd



Landscape & Ecology:
Tyler Grange



Access & Movement:
Hub Transport Planning



Flood Risk & Drainage:
PJS Consulting Engineers



Heritage:
RPS Group



Land Promoter:
Richborough Estates



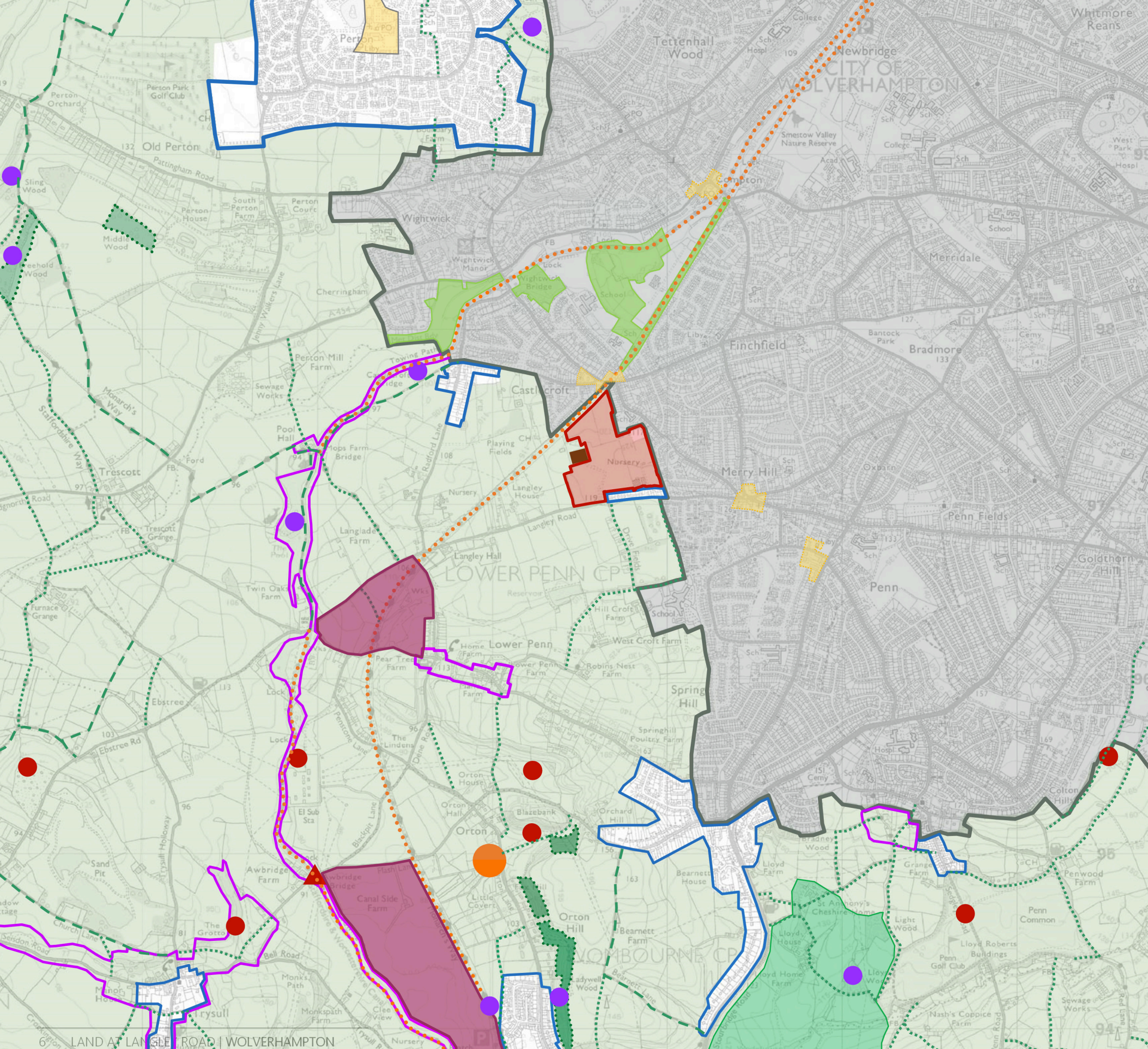


“Planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development”

Para 130(a), NPPF 2021

2

PLANNING POLICY CONTEXT



- THE SITE
- EXISTING ELECTRICITY SUB STATION ADJACENT TO SITE
- SOUTH STAFFORDSHIRE/ WOLVERHAMPTON BOUNDARY
- WOLVERHAMPTON
- PUBLIC RIGHT OF WAY - BRIDLEWAY
- PUBLIC RIGHT OF WAY - FOOTPATH

SOUTH STAFFORDSHIRE DEVELOPMENT POLICIES

- SOUTH STAFFORDSHIRE GREEN BELT
- CONSERVATION AREA
- HISTORIC LANDSCAPE AREA
- ANCIENT WOODLAND
- HOUSING ALLOCATION SITES
- VILLAGE/NEIGHBOURHOOD CENTRE
- BIOLOGICAL ALERT SITE
- SITES OF BIOLOGICAL INTEREST
- ANCIENT MONUMENTS
- LOCAL GEOLOGICAL SITE

RELEVANT WOLVERHAMPTON PLANNING POLICY SITES

- DISTRICT/LOCAL CENTRES
- SITE OF IMPORTANCE/LOCAL IMPORTANCE FOR NATURE CONSERVATION



PLAN ILLUSTRATING SITE LOCATION, CONTEXT & SOUTH STAFFORDSHIRE DEVELOPMENT PLAN DESIGNATIONS | NOT TO SCALE



PLANNING POLICY CONTEXT


NATIONAL PLANNING GUIDANCE

- 2.1 In July 2021, the Government published a revised National Planning Policy Framework ("Framework") which replaces the previous guidance published in 2019 and provides the overarching planning framework for England. Central to the Framework is a presumption in favour of sustainable development which is the golden thread running through both plan-making and decision-taking (paragraph 11). The Framework also seeks to boost the supply of housing and requires local authorities to plan positively for objectively assessed needs and maintain a sufficient supply of housing land.
- 2.2 Paragraph 140 of the Framework states that once the general extent of a Green Belt has been approved, it should only be altered in 'exceptional circumstances' through the plan-making process and that the amended Green Belt boundary should be "capable of enduring beyond the plan period". There are exceptional circumstances which justify alteration to the Green Belt boundary in South Staffordshire District and the site offers an opportunity to release Green Belt in a sensitive manner, without harming its purposes and functions, as set out in paragraph 138 of the Framework.
- 2.3 Furthermore, paragraph 8 of the Framework sets out that sustainable development has three overarching objectives: economic, social and environmental.
- 2.4 The proposed development accords with each of these objectives, contributing to building a strong, responsive and competitive economy, supporting strong, vibrant and healthy communities and continuing to protect and enhance the natural, built and historic environment.

2.5 Chapter 5 of the NPPF sets out how local authorities should boost significantly the supply of housing in order to deliver sufficient supply of homes. The land at Langley Road, Wolverhampton, represents a deliverable site that is available, achievable and viable and the provision of housing on the wider site would boost the supply of housing in the District.

EXISTING DEVELOPMENT PLAN

- 2.6 The Development Plan for South Staffordshire currently comprises:
 - Adopted Core Strategy (adopted 11th December 2012)
 - Site Allocations Document (SAD) (adopted 11th September 2018)
- 2.7 The Core Strategy establishes the strategic policies for the District, notably the housing requirement and distribution of housing (Core Policy 1 and Core Policy 6), whilst the Site Allocations Document provides a range of allocations to deliver the requirements set out within the Core Strategy.
- 2.8 The policies map identifies the following designation for the site:
 - Green Belt (Policy GB1)
- 2.9 Langley Road does not lie within a Neighbourhood Area Designation and therefore a Neighbourhood Plan has not been progressed to date in respect of this area.



National Planning Policy Framework

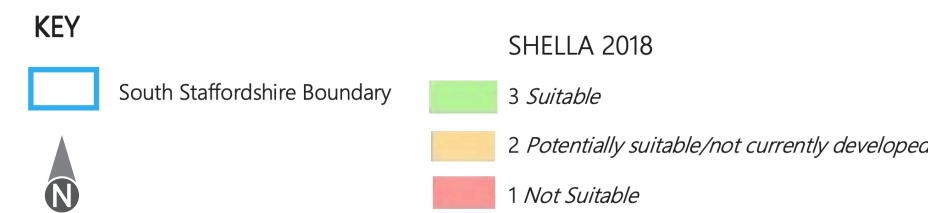
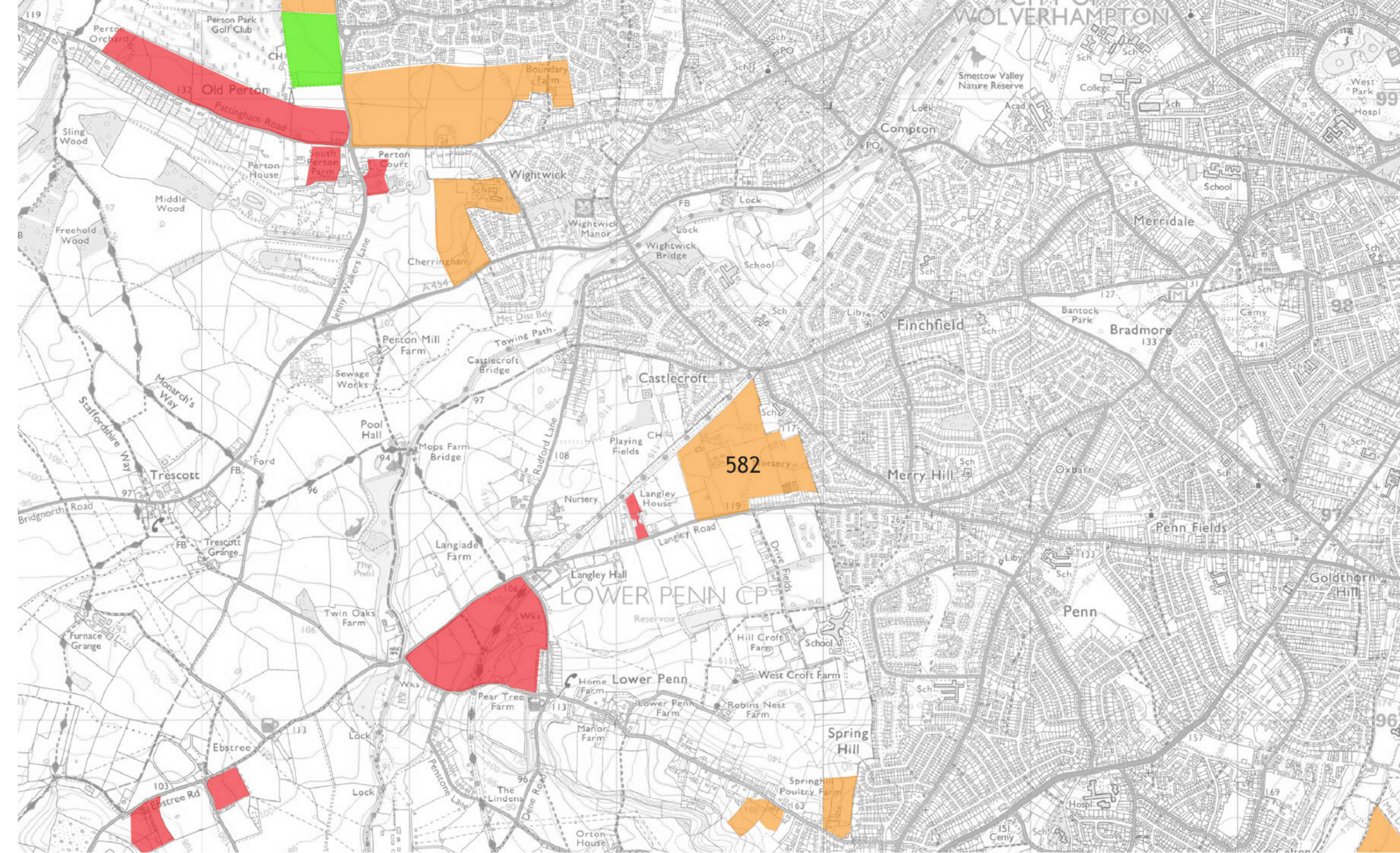
EMERGING LOCAL PLAN

- 2.10 South Staffordshire District Council has commenced work on a review of the adopted Local Plan which is essential to respond to unmet housing needs within the District and those confirmed within the wider Greater Birmingham and Black Country Housing Market Area (GBCCHMA). The Local Plan Review provides an opportunity for the Council to establish a robust housing requirement, having regard to local housing needs and cross boundary requirements and comprehensively review the vision, strategic objectives, spatial development strategy and policies for shaping detailed development proposals. The review process will also ensure consistency with the new National Planning Policy Framework (NPPF), which seeks a requirement for local planning authorities to keep their Local Plan up to date by undertaking a review at least every five years.
- 2.11 The Core Strategy was adopted prior to the requirement to establish a housing requirement based on objectively assessed housing needs and the clear conclusion that a housing shortfall exists across the Housing Market Area in which the District lies. The current housing supply versus planned development is calculated to be a minimum of 60,855 homes between 2020 and 2036, as set out within the Greater Birmingham HMA Strategic Growth Study. This significant shortfall will be an important consideration in informing the appropriate housing requirement for South Staffordshire District to be determined through the review process.
- 2.12 Approximately 80% of South Staffordshire lies within the West Midlands Green Belt. The Council acknowledges that it may be necessary to consider Green Belt boundaries in some locations to accommodate the necessary levels of growth in a sustainable manner. The combined requirements of an

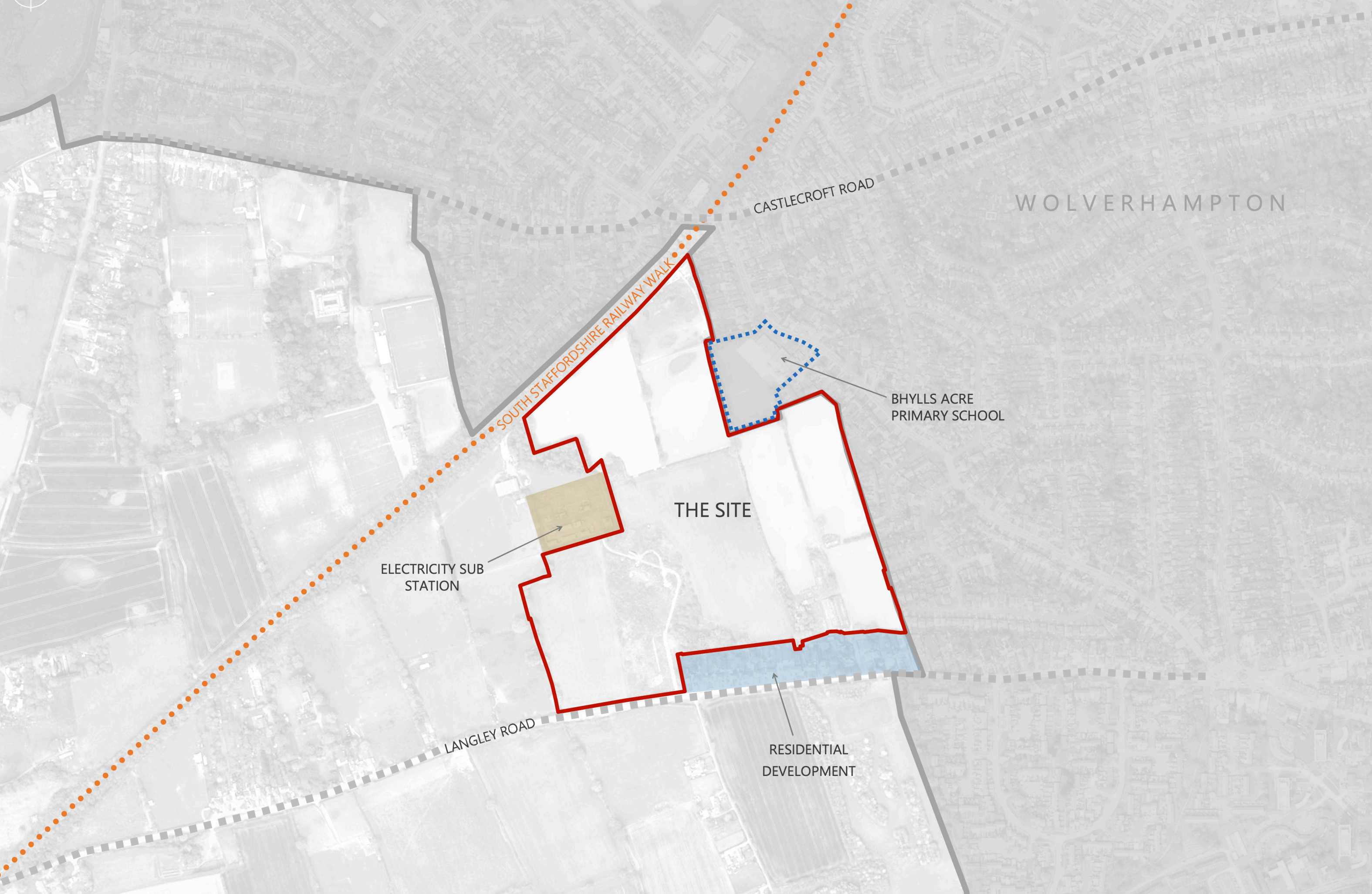
- increased OAN and the potential for meeting an element of the overspill requirement is likely to increase pressures for Green Belt releases, given the lack of urban capacity and the small proportion of the district that lies outside the current Green Belt designation.
- 2.13 In the context set out above it is clear that further release of Green Belt land is required to assist in the delivery of the housing requirement in sustainable locations. In addition, further housing growth within the District will be required in the longer term, beyond the proposed plan period and therefore further safeguarded land should be identified to allow for future needs to be met.
- 2.14 The National Planning Policy Framework sets out at paragraph 140, that:
- “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.”***
- 2.15 The South Staffordshire Local Plan has reached Regulation 19 stage. Based on the evidence base and a thorough review of the circumstances of the Langley Road site, the council have concluded that exceptional circumstances exist to remove the site from the Green Belt and allocate it for housing development. As a result, Policy DS5 of the Regulation 19 Local Plan allocates the site for a minimum of 390 dwellings and removes it from the Green Belt.

JUSTIFICATION FOR GREEN BELT RELEASE

- 2.16 Given the need to accommodate an increased amount of housing and employment land, South Staffordshire District Council concluded there were exceptional circumstances to release land from the Green Belt through the adoption of the Site Allocations Document in September 2018. However, as part of undertaking the Local Plan Review, it remains that there is the need to consider the further release of Green Belt land, partly due to South Staffordshire District Council's obligations under the Duty-to-Cooperate with neighbouring Black Country authorities. As such, in the context of significant unmet development needs, exceptional circumstances exist to justify further release of Green Belt land.
- 2.17 In August 2022, SSSDC published the South Staffordshire Green Belt Study Addendum. The reports are an addendum to the South Staffordshire Green Belt Study (2019) and provides additional sub-parcel assessment and amended maps and plans to reflect the addition of a sub-parcel.
- 2.18 The Green Belt Study comprised of two parts; the first was to assess 'strategic variations' between the contribution of land to the five purposes of the Green Belt, whilst the second includes a more focused assessment of the potential 'harm' of removing land from the Green Belt.
- 2.19 Alongside the Green Belt Study, a Stage 3 assessment involved undertaking a landscape sensitivity assessment in order to assess the sensitivity of land within the South Staffordshire to housing and employment development. Whilst there is a relationship between landscape sensitivity and Green Belt contribution/harm in that physical elements which play a role in determining landscape character, there are fundamental distinctions in the purposes of the two assessments. As such, the findings of the Stage 3 landscape sensitivity assessment for South Staffordshire and the Black Country are presented in a separate document (Landscape Study 2019) and is considered later in this representation.



SOUTH STAFFORDSHIRE SITE ASSESSMENT – SOUTH WESTERN EDGE OF BLACK COUNTRY CONURBATION | NOT TO SCALE



GREEN BELT PURPOSES

2.20 The National Planning Policy Framework (NPPF) (2021) states that the Green Belt should serve the five following purposes:

- To check the unrestricted sprawl of large built-up area;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

LAND OFF LANGLEY ROAD; CONTRIBUTIONS TO GREEN BELT PURPOSES

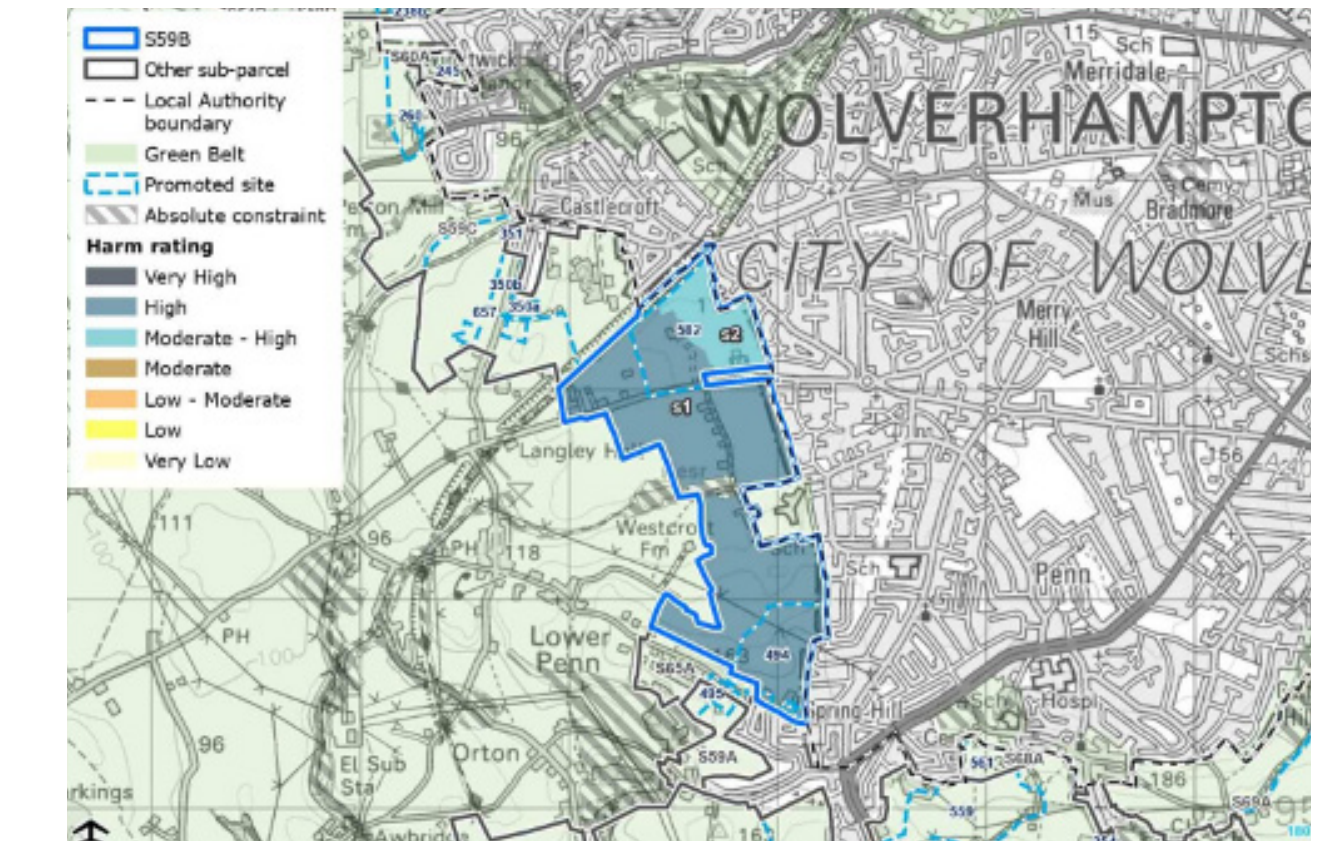
2.21 The Green Belt Study 2019 shows Land off Langley Road, Wolverhampton, as falling within Green Belt Sub-Parcel Ref S59B – ‘Spring Hill [and adjacent land]’, which is identified as making the following contribution to the five purposes of the Green Belt:

GREEN BELT PURPOSE	PREVIOUS RATING	RATING
P1: Checking the unrestricted sprawl of large built-up areas	Land is adjacent or close to the large built-up area, contains no or very limited urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside.	Strong Contribution
P2: Preventing the merging of neighbouring towns	Land plays no significant role due to the distance between the West Midlands conurbation and Bridgnorth, its nearest neighbouring town.	Weak/No Contribution
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (i.e., an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	Strong Contribution
P4: Preserve the setting and special character of historic towns	Land does not contribute to the setting or special character of a historic town	Weak/No Contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong Contribution

2.22 The Study at Appendix 3 goes on to identify differing levels of harm if land within the parcel was to be released from the Green Belt for development. Should any ‘uncontained’ land within the parcel be released for development, the resulting harm would be ‘high’. In respect of ‘land north of housing on Langley Road’, the resulting harm would be ‘moderate-high’, stating:

“The sub-parcel makes a strong contribution to checking the sprawl of the West Midlands conurbation and to preventing encroachment of the countryside. This part of the sub-parcel is tightly contained by outcrops of the settlement of Wolverhampton. Release of this land would therefore have a negligible effect on the Green Belt.”

This is supported within the 2022 Green Belt Exceptional Circumstances Topic Paper.



HARM RATINGS FOR LAND PARCEL S59B

2.23 Whilst the conclusions of the above assessment are noted, it remains that Green Belt Sub-Parcel ref: S59B extends significantly beyond Land off Langley Road, which itself serves a reduced function against the five purposes of the Green Belt, as assessed below.

TO CHECK THE UNRESTRICTED SPRAWL OF LARGE BUILT-UP AREAS

2.24 The site relates well to the edge of the built form of the West Midlands conurbation, being enveloped by existing built features on three of four sides. Specifically, the site is bounded by the South Staffordshire Railway walk to the north, beyond which lies residential development. Bhylls Acre Primary School and further residential properties lie to the east, whilst residential properties also lie to the south of the site on Langley Road.

2.25 An existing electricity substation is also sited immediately adjacent to a section of the site’s western boundary, representing an urbanising feature beyond the currently settlement edge. The land west of the substation is also to be developed as a battery storage facility, following a grant of planning at appeal in December 2021. The battery storage development and substation site in combination will in effect extend the urban edge of the conurbation beyond the Langley Road site. The additional urbanising effect of these developments further limits the impact of the proposed allocation in terms of impact on the landscape and in regard to green belt issues.

2.26 Furthermore, the site’s western boundary is comprised of intermittent mature trees and hedgerow, which could be strengthened in order to provide an enduring future Green Belt Boundary, level with the surrounding settlement edge to the north and south. The release of the site for development would serve to consolidate and ‘round-off’ the settlement edge in this location.

2.27 It is therefore felt that the site makes a ‘moderate’ contribution to checking the unrestricted sprawl of large built-up areas, rather than the ‘strong’ contribution identified within the Green Belt Study.

TO PREVENT NEIGHBOURING TOWNS FROM MERGING INTO ONE ANOTHER

2.28 The site plays no significant role in preventing neighbouring towns from merging into one another and therefore makes a ‘weak/no’ contribution to preventing neighbouring towns from merging into one another.

2.29 Richborough Estates accordingly agrees with the conclusions of the Green Belt Study in this regard.

TO ASSIST IN SAFEGUARDING THE COUNTRYSIDE FROM ENCROACHMENT

2.30 Whilst the Site itself site contains some characteristics of open countryside, such as an absence of built development, it remains that the site is surrounded by existing built form on three of its four sides, with the addition of the electricity substation partly forming the fourth site boundary. The site is accordingly strongly influenced by existing urbanising features.

2.31 Furthermore, the site has durable defensible boundaries that are afforded clear physical enclosure from the wider Green Belt. The development of the site would present the opportunity to further strengthen these boundaries, thus safeguarding the countryside from future encroachment.

2.32 It is therefore considered that the site makes a ‘moderate’ contribution to assisting in safeguarding the countryside from encroachment, rather than the ‘strong’ contribution identified within the Green Belt Study.

TO PRESERVE THE SETTING AND SPECIAL CHARACTER OF HISTORIC TOWNS

2.33 Richborough Estates agrees with the conclusions of the Green Belt Study, that the site makes a ‘weak/no’ contribution to preserving the setting and special character of historic towns.

TO ASSIST IN URBAN REGENERATION, BY ENCOURAGING THE RECYCLING OF DERELICT AND OTHER URBAN LAND

2.34 Whilst it is acknowledged that all Green Belt land contributes towards encouraging the recycling of derelict and other urban land, the site and immediate area does not contain significant areas of brownfield land and would therefore not prejudice the redevelopment of urban land in this area. As such, the release of the site from the Green Belt and allocation for residential development would not significantly prevent the recycling of derelict land and other urban land.

2.35 It is therefore considered that the site makes a ‘moderate’ contribution to this purpose of the Green Belt, rather than the ‘strong’ contribution identified within the Green Belt Study.

SUMMARY OF GREEN BELT PURPOSES

2.36 Overall, it is therefore considered that Land off Langley Road, Wolverhampton, makes a reduced contribution to the five purposes of the Green Belt than that identified within the Green Belt for Green Belt Sub-Parcel ref: S59B. This contribution is summarised in the table below:

GREEN BELT PURPOSE	PREVIOUS RATING	REVISED RATING
P1: Checking the unrestricted sprawl of large built-up areas	Strong Contribution	Moderate Contribution
P2: Preventing the merging of neighbouring towns	Weak/No Contribution	Weak/No Contribution
P3: Safeguarding the countryside from encroachment	Strong Contribution	Moderate Contribution
P4: Preserve the setting and special character of historic towns	Weak/No Contribution	Weak/No Contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	Strong Contribution	Moderate Contribution

LAND OFF LANGLEY ROAD, GREEN BELT ASSESSMENT

GREEN BELT HARM

2.37 Given the reduced impact upon the five purposes of the Green Belt set out above, is contented that the Green Belt harm identified within the Study should be reduced from ‘moderate-high’ to ‘low-moderate’.



“Planning policies and decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping”

Para 130(b), NPPF 2021

3

SITE AND ITS SURROUNDING CONTEXT

3

THE SITE AND SURROUNDING CONTEXT

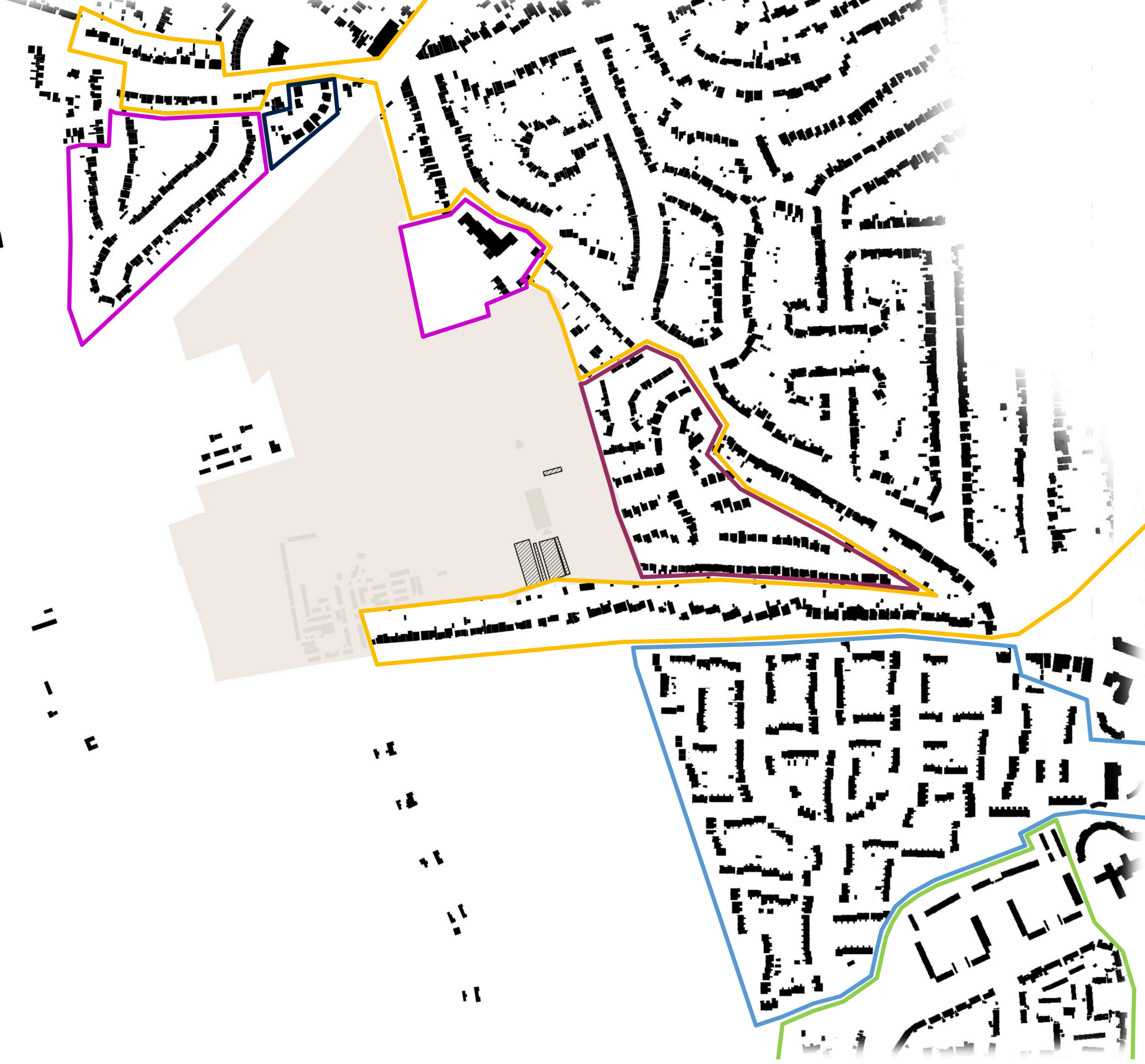
KEY

- c. 1930-40
- c. 1950
- c. 1960
- c. 1970
- c. 1975
- c. 2000

Existing nursery buildings c.1947, now derelict

Buildings on site c. 1947 but subsequently demolished

PATTERN OF SURROUNDING BUILT DEVELOPMENT
| NOT TO SCALE



THE SITE

- 3.1 Land at Langley Road adjoins the western edge of the Black Country conurbation to the north of Langley Road. The South Staffordshire Railway Walk lies to the north and an electricity distribution substation and fields are located to the west. The site extends to approximately 19 hectares and comprises a number of fields within agricultural use and land associated with a derelict nursery.
- 3.2 The site appears to have a high point at the centre of the eastern edge of the site. The remainder of the site falls to the north and to the southwest. The northern slope appears to be initially steep with a slight valley towards the north corner of the site.
- 3.3 Richborough Estates has secured an interest in the site.

SURROUNDING BUILT FORM

- 3.4 The majority of housing in the Merry Hill area takes the form of 1930s suburban semi-detached houses, arranged as 'perimeter blocks'; there are a number of cul-de-sacs. The existing housing along Langley Road immediately to the south of the site was built during this era. The houses, set back from the street edge, are characterised by hipped-roofs, bay windows and white render. Front gardens are enclosed by low brick walls.
- 3.5 The post-war years saw housing development to the south-east of the site, at Warstones Drive, in the form of two- and three-storey blocks of flats arranged in courtyards set in open green space. The housing is constructed in red brick, with dark brown pantiles and hipped roofs. The terraces have balconies; some are recessed.

SURROUNDING AREA

- 3.6 Later, during the 1970s, the area to the north of Warstones Drive was developed in the form of 2-storey terraced housing arranged in small groups with rear parking courtyards and footpath access off green fingers which criss-cross the scheme. The eastern part of the development includes 3no. 16-storey slab blocks which are visible from the south-eastern part of the site.
- 3.7 Bellencroft Gardens immediately adjacent to the site, to the east, was also developed during the 1970s. This housing development takes the form of detached two-storey houses, some linked by single-garages, others with integral garages. Parking is accommodated on plot, and front gardens are simple lawns, left open to the street.
- 3.8 Bhylls Acre Primacy School, also adjoining the site's eastern boundary, was constructed during the 1960s. It comprises predominantly single storey flat-roofed blocks arranged in a staggered pattern. The buildings are separated from the site by playing fields.
- 3.9 The area to the north of the site (north of the South Staffordshire Railway Walk) was developed c.1960. Its layout echoes the surrounding 1930's street pattern.
- 3.10 Finally, to the north of the site (north of the South Staffordshire Railway Walk) there is a small recent infill housing development comprising 2-storey detached houses arranged in a crescent, with gardens backing onto the Railway Walk.

- 3.11 Merry Hill, Castlecroft and Upper Penn provide a good range of shops, including supermarkets and community and health care facilities. In addition, the area includes a number of primary and secondary schools and good access to public transport.
- 3.12 Merry Hill is well placed geographically and through good transport links to provide an appropriate location for meeting cross boundary pressures. Land at Langley Road is in a sustainable location and is very well located to take advantage of local facilities within neighbouring centres of Wolverhampton that are typically used on a day-to-day/ weekly basis, such as convenience stores, post office, bank, dining and coffee facilities, surgery, dental practice and a range of schools. All of these services can be reached easily and quickly by foot from the site.
- 3.13 The site provides an opportunity to deliver much needed housing, together with all necessary supporting infrastructure.



“Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change”

Para 130(c), NPPF 2021

4

ENVIRONMENTAL CONSIDERATIONS



- Bus Stops
- Merry Hill Facilities (including: Co-op Food, convenience stores, butchers, bakery, barbers, hairdressers, takeaways, Boots, public house, and post office)
- 1 Bhylls Acre Primary School
- 2 Castlecroft Primary School
- 3 Smestow School
- 4 Penn Fields School
- 5 Highfields School
- 6 St Michael's Catholic Primary Academy
- 7 Westacre Infants School
- 8 Warstones Primary School
- 9 Uplands Junior School
- 10 Springdale Junior and Infant Schools
- 11 Dentist
- 12 Boots Pharmacy
- 13 Opticians
- 14 Castlecroft Medical Practice
- 15 Firs Inn Public House
- 16 The Mermaid Public House
- 17 Finchfield Library
- 18 Warstones Library
- 19 Newsagents and Convenience Store
- 20 Hairdressers

N
 LOCAL FACILITIES | NOT TO SCALE

4

ENVIRONMENTAL CONSIDERATIONS

INTRODUCTION

4.1 This section assesses the relevant environmental considerations at the site. It demonstrates that there are no constraints that prevent the development of the site for a residential-led scheme.

PROXIMITY TO LOCAL FACILITIES

4.2 A parade of local shops is located on Windmill Lane in Castlecroft. Facilities here include; pharmacy, foodstores and newsagent, health & beauty centre, opticians, a hair salon, and The Firs public house. The facilities are a 650m-750m walk from the centre of the site via the footway link to Castlecroft Road.

4.3 There are additional local shops and facilities located around the Langley Road/Bhylls Lane/Finchfield Lane/ Trysull Road/ Coalway Road junction complex, at an approximate 1km walk from the centre of the site. Facilities at this location include; Costsaver mini-market, butcher's shop, Chinese takeaway restaurant, hairdresser, bakery, barber, card & gift shop, Co-Operative store, bookmakers, charity store, Boots pharmacy,

vets, fish & chips takeaway, kebab restaurant, Indian restaurant, vape store, The Merry Hill public house, and St Joseph's Church (C of E). Additional shops and local facilities, including a post office, are provided at the junction of Coalway Rd/ Warstones Rd, Oxbarne Ave, slightly further to the east.

4.4 The Bhylls Acre Primary School is located adjacent to the site and is an approximate 650m walk distance via the footway link to Castlecroft Road. Other nearby schools are located within the City of Wolverhampton and include; Highfields School (Secondary) and Penn Fields (Special School) located off Boundary Way at about a 1.4km walk from the site. St Michael's Catholic Primary Academy is located off Telford Gardens at about a 1.2km walk from the site and Springdale Junior & Infant schools are located about 1.7km from the site.

4.5 The Castlecroft Medical Practice is located at about a 1.0km walk from the centre of the site via the footway link to Castlecroft Road. Dental practices are available at an approximate 840m walk via Bellencroft Gardens.

ACTIVE & SUSTAINABLE TRANSPORT

4.6 The South Staffordshire Railway Walk lies on the northern boundary of the site. Despite the name the route is indicated as a pedestrian and cycle route on ordnance survey maps and links to the route are available from Castlecroft Road via a footway/cycleway link from the site. The route meets canal based routes towards Wolverhampton City Centre.

4.7 A footway is provided along the site frontage with Langley Road and footway/cycleway links are also to be provided to Bellencroft Gardens, potentially shortening routes to local facilities.

4.8 The number 3 bus service can be accessed from Castlecroft Road at about 650m from the centre of the site. The service starts early in the morning and runs, at a 15-minute daytime frequency Mon-Sat, via the City Centre to Pendeford and i54. The service runs at an hourly frequency on Sundays. Service numbers 2, 4 and 712 can be accessed to the east at about a 1km walk. Service number 2 is a very frequent service to Wolverhampton and on to Bushbury Hill and service number 4 runs every 15 minutes towards Wolverhampton and beyond. Service 712 is a school service running to Highfields School.

ACCESS AND MOVEMENT

LOCAL HIGHWAY NETWORK

- 4.9 The site is situated on Langley Road, to the west of Wolverhampton and incorporates land north of Langley Road and southwest of Bhylls Lane. To the north-west, the site is bounded by the South Staffordshire Railway Walk.
- 4.10 The speed limit on Langley Road is 30mph/40mph along the site frontage. To the east, Langley Road links with the Langley Road/Bhylls Lane/Finchfield Lane/Trysull Road/Coalway Road junction complex for links onto the wider highway network including towards Wolverhampton City Centre and onwards towards Birmingham.
- 4.11 Langley Road is a single two-lane carriageway as it passes the site with a footway and verge running alongside the site frontage and a verge running alongside the carriageway opposite the site.
- 4.12 Traffic flows along Langley Road in the vicinity of the site are relatively modest during peak hours, and no queues or delays were observed in the immediate vicinity of the site.



POLICY CONSIDERATIONS

- 4.13 Staffordshire CC's LTP 2011-2026 has as one of its stated aims to:

“Enable economic growth without congestion”

- 4.14 The LTP suggests that it will seek to stimulate regeneration and support areas of deprivation, and to maximise the reliable operation of the existing road network. The LTP promises to facilitate sustainable access (including public transport, walking and cycling) to tourist attractions. The LTP states that the authority will make best use of the existing highway network before considering building new roads.
- 4.15 Policy 3.1 of the Plan states that Staffordshire CC will support the adoption of sustainable land-use planning policies and reduce the impact of development where it negatively affects the highway network.
- 4.16 The policy indicates that it will work through the LDF (now LP) process in order to achieve this aim. The Policy also makes reference to securing suitable planning obligations on development to secure appropriate highway and sustainable transport measures and that travel plans should support developments and include suitable modal shift targets and monitoring regimes.
- 4.17 The LTP acknowledges the role of transport in seeking to improve the health and quality of life of residents of Staffordshire. The LTP seeks to promote active travel and to reduce the impacts of poor air quality and road noise on its residents.
- 4.18 The relevant national policy is set out in the National Planning Policy Framework (NPPF) dated February 2019 which, with reference to transport, states in Paragraphs 103, 108 & 109:

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

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users; and

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

INDICATIVE ACCESS STRATEGY

- 4.19 The proposed vehicle access will be direct from Langley Road in the form of the access road giving way to main road traffic. Suitable visibility can be achieved at the site access in accordance with observed speeds and guidance provided in Manual for Streets 2 (MfS2). The site access can accommodate a refuse lorry, which is typically the largest vehicle that might be expected to access site on a week-to-week basis. As well as larger HGVs.
- 4.20 A further access point, or points, for emergency vehicles and pedestrians/cyclists can be provided from Bellencroft Gardens to the eastern boundary of the site. The emergency access will be designed in line with relevant guidance.
- 4.21 There is potential for pedestrian/cycle links are to be provided from the residential estate situated to the east, including emergency vehicle access, and pedestrian/cycle links will also be promoted towards Castlecroft Road to give access to the South Staffordshire Railway Walk.
- 4.22 As part of the promotion and pre-application process, consultation will be undertaken with Staffordshire County Council as Highway Authority, City of Wolverhampton Council as the neighbouring highway authority, and South Staffordshire Council as planning authority.



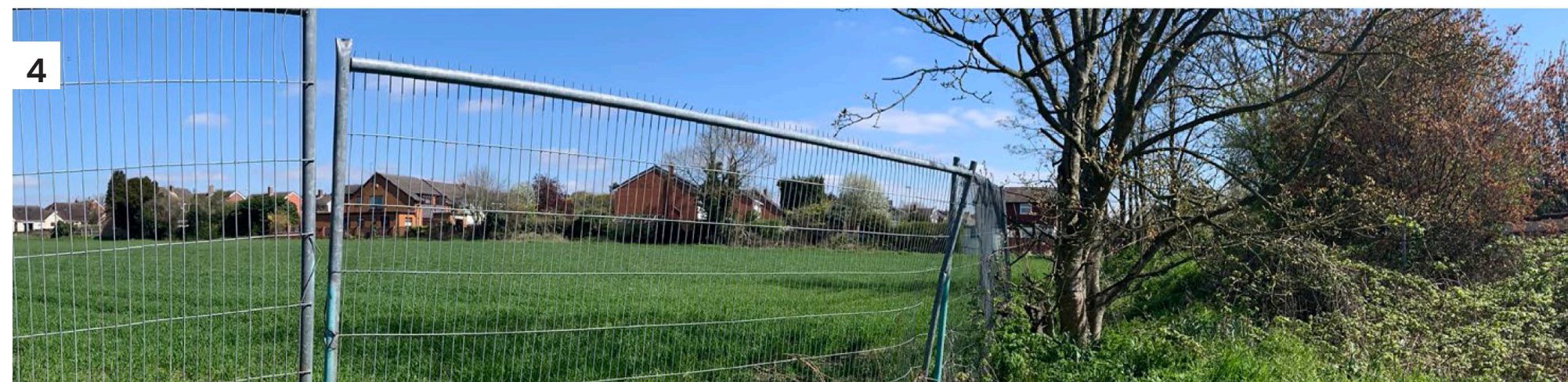
PROPOSED SITE ACCESS | NOT TO SCALE

1. View facing south across the site in close proximity to the South Staffordshire Railway Walk.
2. View across the pond near the north eastern corner of the site.
3. View of the derelict buildings and the south eastern field parcel from the southern boundary.
4. View of the existing properties backing onto the eastern boundary.



LANDSCAPE AND VISUAL POLICY CONTEXT

- 4.23 The site is not subject to any national landscape designations, nor has ever been considered for such. The site lies within the Green Belt.
- 4.24 The site is situated within South Staffordshire district, located on the western periphery of Wolverhampton near Merry Hill. Applicable local policy objectives address the need to conserve and enhance the landscape of the Green Belt and the green infrastructure of the District.
- 4.25 There are no Public Footpaths within the site boundary, although adjacent to the northern boundary lies the South Staffordshire Railway Walk. There are also a network of Public Rights of Way present across the wider landscape in close proximity to the southern boundary



LANDSCAPE CHARACTER

- 4.26 At a regional level, within the Staffordshire County Council Planning for Landscape Change SPD (2000), the site is identified as being located within the 'Sandstone Estatelands'.
- 4.27 The key characteristics of the Sandstone Estatelands include:
- A gently rolling, featureless landscape
 - Remnants of silver birch woodland and heathland species present in hedgerows
 - Sparsely settled pattern of expanded hamlets and isolated large farms and estate buildings
 - Straight minor roads
 - Silver birch woodlands
 - Well-treed stream corridors
 - Intensive arable agriculture in an open remnant field pattern
- 4.28 Incongruous features in the area identified by the SPD include the following:
- Hedgerow removal along roadsides
 - Field trees
 - Badly designed farm reservoirs
 - Large modern farm buildings and improved commuter properties
 - Power lines

SITE-SPECIFIC CONTEXT

- 4.29 The northern site boundary is defined by the South Staffordshire Railway Walk, lined with mature woodland vegetation, set in-cutting, with existing residential development beyond.
- 4.30 A pond is situated on the site's low point towards the north east corner, close to the existing properties and school along the eastern boundary. The urban influencing features continue towards the south east, with properties overlooking the eastern field parcels, divided by internal hedgerows and trees.
- 4.31 The remains of a former nursery lie beyond the properties off Langley road along the site's southern boundary, with a small access point between the properties.
- 4.32 At the site's most southern part close to an access gate, a road weaves through an area of scrub land with trees which lead to the off-site substation which influences the site's western edge. Surrounding woodland vegetation assist with screening this from the surrounding landscape.
- 4.33 The hedgerow field boundaries provide containment and structure to the irregular-shaped fields and are also characteristic features within the local landscape. They should be retained and enhanced wherever possible to strengthen the visually-contained nature of the site.



VIEWS

4.34 Views from within the site are expansive due to the large, irregular shaped field sizes, however, mature, internal hedgerows and trees restrict direct visibility across the site. Along the site's northern boundary lies the South Staffordshire Railway Walk, although allows for no intervisibility with the site due to the intervening trees and the sheer depth of the railway walk in-cutting.

4.35 Viewpoint 1 is representative of users of the footpath and residents to the south of the site beyond Langley Road. Although in close proximity, development off Langley Road and intervening vegetation screens views of the site entirely.

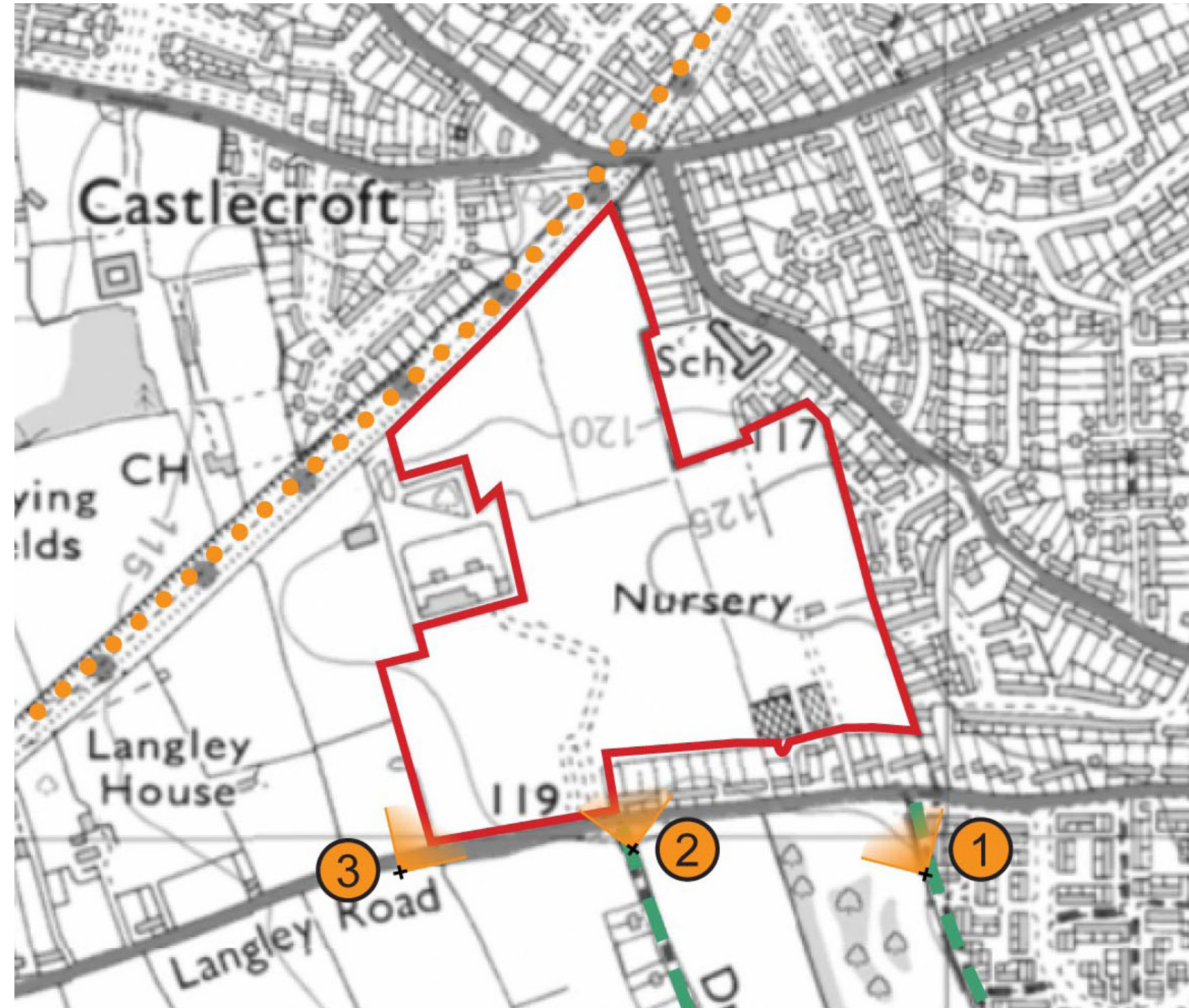
4.36 Viewpoint 2 shows the view from Lower Penn 9 footpath to the south of the site where it meets Langley Road. At its closest proximity to the site, views are possible towards the site beyond the boundary vegetation, although the majority of the site is screened by the existing properties off Langley Road.

4.37 Viewpoint 3 shows the view from Langley Road facing north east. The managed hedgerow along the site's southern boundary assists to filter views into the site.

4.38 Western boundary trees and hedgerow aids with filtering views further west of the site. Properties on Langley Road visible to the south of the site

4.39 Overall, the main receptors of the site with potential views are transient users of local roads and local residents to the north, east and south of the site. With a sympathetic proposed development that retains key landscape features and with the retention and enhancement of internal and existing boundary hedgerows and trees, the visual context would remain largely intact.

4.40 The site is well-contained within the local context, allowing for no distant views, with the proposed landscape-led development providing no uncharacteristic or incongruous features.





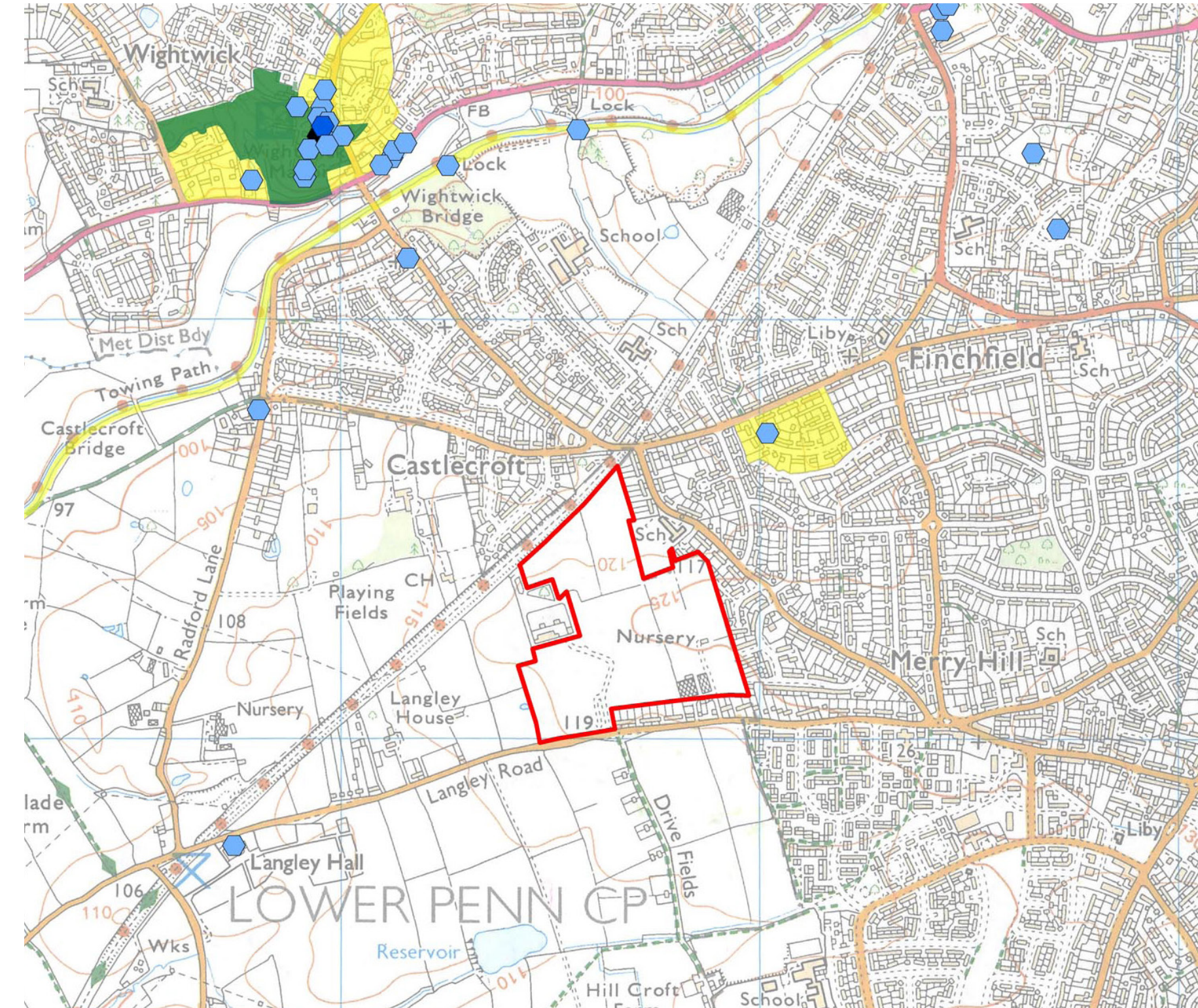
IN SUMMARY

4.41 Overall, the main receptors of the site with potential views are transient users of local roads and local residents to the north, east and south of the site. With a sympathetic proposed development that retains key landscape features and with the retention and enhancement of internal and existing boundary hedgerows and trees, the visual context would remain largely in tact.

4.42 The site is well-contained within the local context, allowing no distant views, with the proposed landscape-led development providing no uncharacteristic or incongruous features.

- Site boundary
- Potential Developable Areas
- Public Open Space
- Opportunities to provide positive new street frontage in keeping with existing properties fronting Langley Road
- Retention of Existing Field Pattern
- Existing Pond
- Existing Public Rights of Way (PRoW)
- South Staffordshire Railway Walk
- Existing Site Access
- New Green Belt Boundary
- Retain and Enhance Existing Hedgerow with Additional Tree and Woodland Planting to Create a Robust and Permanent Green Belt Boundary

LANDSCAPE OPPORTUNITIES & CONSTRAINTS
| NOT TO SCALE



HERITAGE & ARCHAEOLOGY

4.43 RPS Heritage have undertaken an initial appraisal of the extent and nature of known heritage assets within the site and surrounding area. There are no designated heritage assets located on the site.

4.44 Heritage is not considered to be a constraint to the development of the site. Any future planning application would be supported by a Built Heritage Statement which would assess the significance of the potentially affected designated and non-designated built heritage assets, and any impact on their respective significance from the development of the site.

4.45 There are remains of a WWII gun emplacement on the site. This can be retained in an area of open space. There is no suggestion that the site contains buried remains that would be a constraint to development of the site.

- Site Boundary
- Scheduled Monument
- Listed Buildings**
- I
- II*
- II
- Registered Parks and Gardens
- Conservation Areas
- Registered Battlefield
- World Heritage Site

DESIGNATED HERITAGE ASSETS
| NOT TO SCALE

ECOLOGY

4.46 A preliminary ecological appraisal of the Site was undertaken in July 2019 and comprised a desk study and extended Phase I Habitat Survey, the results of which enabled the ecological constraints and opportunities for development at the Site to be identified.

STATUTORY DESIGNATED SITES

4.47 Fen Pools Special Area of Conservation (SAC) lies approximately 9km south-east of the Site. This SAC is designated for its important amphibian assemblage, including great crested newts (GCN) which are an Annex II species protected under the Habitats Directive. Owing to the distance and lack of hydrological connections between the Site and Fen Pools SAC, it is considered unlikely that development at the Site would cause significant adverse effects. Indirect effects due to increased recreational pressures are considered unlikely to be significant due to the distance to the SAC and the presence of alternative publicly accessible greenspace which is closer to the Site (such as Baggeridge Country Park).

4.48 The South Staffordshire Railway Walk Local Nature Reserve (LNR) lies directly adjacent to the northern Site boundary and is predominantly formed of broadleaved woodland with a resident bird population. Sensitive construction practices are required to ensure the LNR is not subject to any direct or indirect effects and the LNR must be retained within a suitable buffer from development (15m minimum) in-line with Policy ENV1 of the Black Country Core Strategy (adopted February 2011). The Smestow Valley LNR also lies approximately 100m north-east of the Site, comprising a mosaic of woodland and grassland habitat, which supports GCN, badgers, Daubenton's bat, and otters.

4.49 It is considered that given the distances involved and through adoption of sensitive construction practices (such as avoiding dust deposition and sediment run-off), there would be no significant adverse effects on known Local Wildlife Sites (LWS) and Sites of Importance for Nature Conservation (SINC) within 2km of the Site (namely Smestow Valley, Staffordshire Worcestershire Canal, and Coppice Road Wood).

HABITATS AND FAUNA HABITATS AND FAUNA

4.50 The Site itself is largely dominated by arable fields of wheat crop and two fields of semi-improved grassland of no more than site ecological importance. The fields are separated by native species-rich hedgerows which are managed to a height of 1.5m. Two ponds which hold water are present onsite, in addition to an offsite pond directly adjacent to the west of the Site.

4.51 The features of highest ecological importance are hedgerows, ponds, and mature trees present largely in the centre of the Site, and the woodland directly adjacent to the north of the Site. These together form a wildlife network through the Site which offers opportunities for the movement of mobile fauna such as bats. Lighting conflicts which might impact bats should be avoided or mitigated to ensure illumination and glare is avoided in a 'dark corridor' between the development and key bat habitat. These buffer zones would be guided by further bat surveys and BCT Guidance on bats and artificial lighting. Where the loss of the semi-improved grassland is required to facilitate

development, replacement habitat or habitat enhancement elsewhere within the Site should be sought, to provide habitat for invertebrates, farmland birds, and foraging bats.

4.52 The multi-functional Green Infrastructure (GI) led approach for the Site offers the opportunity to retain, protect and enhance the features of most ecological value on the Site whilst also delivering drainage, landscape, amenity and open space benefits. This also has distinct advantages in terms of placemaking and consideration could be given to an independent accreditation of a Green Infrastructure Strategy (such as Building with Nature).

4.53 The proposed layout indicates creation of two corridors of GI through the Site, along the western Site boundary and through the centre of the Site, while retaining the woodland corridor to the north. There are opportunities to enhance the Site's importance for ecology and deliver biodiversity net gain through creation of new habitats. The GI approach would be in line with the NPPF and Policy ENV1 of the Black Country Core Strategy.

FURTHER WORK

4.54 Phase II surveys for protected and priority species would be required in due course to inform evolution of the development design and any future planning application. However, presence of such fauna would not be expected to affect the principle of development, with delivery of the measures detailed above in respect of habitats and GI able to accommodate those species that could be present. Phase II surveys required would include:

CONCLUSION

4.55 The majority of the Site is dominated by arable fields and semi-improved grassland habitat of no more than Site ecological importance, losses of which would not trigger planning policy or legislation relating to wildlife. Habitats of most importance (hedgerows, ponds, mature trees, and woodland) can be adequately retained and protected during construction within appropriate buffers that form part of the multi-functional Green Infrastructure. These habitats are also most likely to be of value to any assemblage of protected and priority fauna species which may be using the Site. It is therefore demonstrated that the strategic network of environmental infrastructure will be protected and enhanced within the Site, in-line with Core Strategy Policy CSP3 (Environmental Infrastructure). There are opportunities to offer biodiversity net gain through enhancement of existing habitats, creation of new habitats, and enhancement of habitat connectivity to the wider landscape, which is in-line with local and national aspirations for biodiversity.

FLOOD RISK & DRAINAGE

4.56 The site has been found to be entirely within Flood Zone 1 and is classed as being at Very Low risk of flooding from reservoirs or large waterbodies. The main identified risk of flooding is from surface water with ponding in the north of the site observed both on the Environment Agency Flood Risk Mapping and in satellite imagery of the site.



4.57 No historic fluvial flooding has been recorded on site although ponding is visible in satellite imagery in the site's natural low-point in the north. This does not pose a risk to the site due to onsite mitigation and indicates that infiltration is not suitable on site.

4.58 Sewer flooding is considered to pose a very low risk to the site due to the site topography.

4.59 Tidal and canal sources are not considered to pose a risk due to the distance and terrain between the site and tidal/canal waterbodies.

4.60 A storm water outfall to the existing surface water network beneath Bhylls Lane would facilitate a gravity system with some localised level raising required. This is to be conveyed via the existing school adjacent to the site.

4.61 The site sits on superficial deposits of till above Wildsmoor Sandstone which is classed as a Principal Aquifer however borehole logs conducted in the near vicinity of the site found predominantly clay and did not encounter the bedrock.

4.62 The site has a high point in the east and generally falls away from this in all other directions. Overland flows onto the site may occur however this would be predominantly from the east and is unlikely given this area's general level of development.

4.63 An estimate of the greenfield runoff for the site has resulted in a QBar estimate of approximately 7.6l/s across the site.

4.64 This result has a corresponding site-wide storage estimate of approximately 12000m³ assuming 60% sitewide impermeability. This information has been used to suggest potential attenuation basins in the north and south of the site with conveyance routes incorporating swales and pipes between them.

4.65 A storm water attenuation proposal has been developed alongside an existing constraints plan which caters for storms up to and including the 1:100 year storm + 40% allowance for climate change. This assumes that the discharge will be controlled and restricted to the greenfield runoff rate (QBar) using SUDS and attenuation basins before discharging to the existing surface water network.

4.66 The incorporation of SUDS features and mimicking of existing greenfield flows will ensure no increase in flood risk results from the development whilst improving overall water quality and biodiversity.

4.67 Exceedance flows have been considered and are to be directed away from residential developments and towards open space through the use of the SUDS network, overland flow routes and localised depressions.

4.68 Foul Drainage is anticipated to follow the same route through the existing school to discharge to the existing foul water network beneath Bhylls Lane.

UTILITIES

4.69 An existing electric sub station is present adjacent to the west of the site.

4.70 This has associated high voltage and extra high voltage cabling, some of which traverses from North to South from the sub station across the southwest of the site. Other associated high voltage cabling travels along the northwest boundary towards Castlecroft Road.

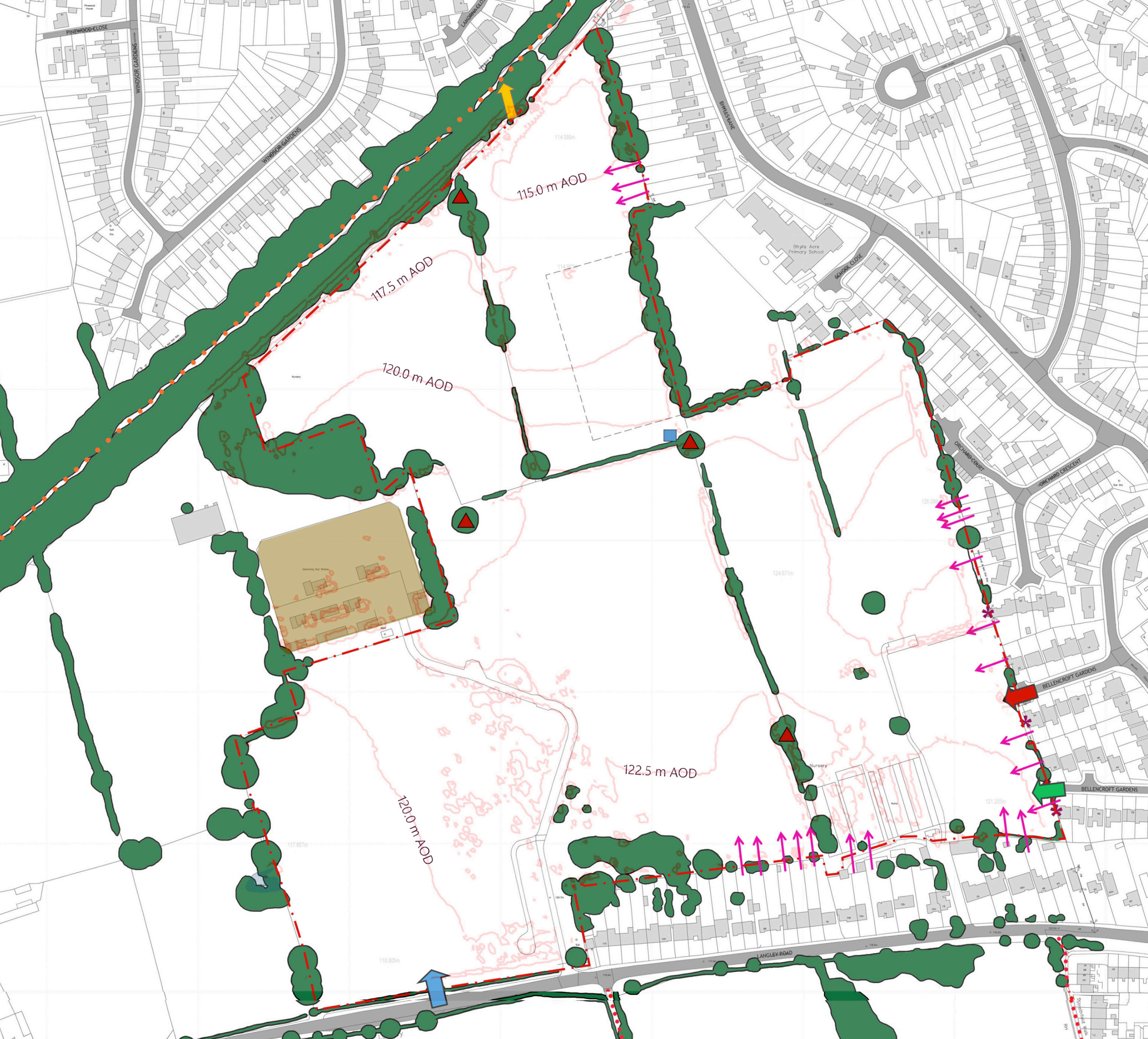
4.71 An existing medium pressure gas main travels alongside high voltage cabling along the northwest border of the site. This is shown by utilities records to be outside of site. This is shown by utilities records to be outside of the site boundary. These are also present within Langley Road.

4.72 Other utilities such as telecoms and water supply are located within Langley Road and are expected to currently serve the residential development bordering the site.

4.73 No capacity issues are envisaged in servicing the development due to the extensive utility infrastructure in close proximity.

4.74 In addition, planning permission has been granted for a battery storage site on land to the west of the site. It is not anticipated that this will have any significant implications for residential development on the site. However, as the scheme's developed, assessments will be carried out on such matters as noise impact and any necessary mitigation identified.





- SITE BOUNDARY
- EXISTING TREES AND HEDGES
- ➔ POTENTIAL ACCESS LOCATION
- ➔ POTENTIAL EMERGENCY ACCESS POINTS
- ➔ POTENTIAL FOR FURTHER ADDITIONAL EMERGENCY ACCESS
- EXISTING PUBLIC RIGHTS OF WAY
- SOUTH STAFFORDSHIRE RAILWAY WALK
- ➔ POTENTIAL FOOTPATH CONNECTION TO SOUTH STAFFORDSHIRE RAILWAY WALK
- ➔ RESIDENTIAL AMENITY CONSIDERATIONS
- * EXISTING HABITABLE ROOM WINDOWS TO BE CONSIDERED
- EXISTING SUBSTATION
- EXISTING SITE CONTOURS
- BADGER SETT
- ▲ TREES WITH HIGH/MODERATE BAT POTENTIAL

OPPORTUNITIES & CONSTRAINTS
| NOT TO SCALE

SUMMARY OF ANALYSIS

4.75 Richborough Estates have considered landscape character, ecology, highways, flood risk and drainage, heritage and archaeology, and it has been demonstrated that there are no constraints that would preclude development at the site. The analysis has shown:

- The site is well-located in terms of local facilities, public footpaths, as well services, in particular to local bus services
- There are no designated heritage assets on the proposed development site
- Built heritage assets are not considered to be a constraint to the development of the site as future development will incorporate mitigation measures to reduce any impact on their significance
- The majority of the site is dominated by arable fields and semi-improved grassland habitat of no more than Site ecological importance, losses of which would not trigger planning policy or legislation relating to wildlife
- The strategic network of environmental infrastructure will be protected within the site in line with Core Strategy Policy CSP3
- The incorporation of SUDS features and mimicking of existing greenfield flows will ensure no increase in flood risk results from the development, whilst improving overall water quality and biodiversity
- No capacity issues are envisaged in servicing the development due to the extensive utility infrastructure in close proximity

4.76 Principal considerations and opportunities that a development proposal should take into consideration are as follows:

CONSIDERATIONS

- Site topography and associated high/low points;
- Existing landscape comprising mainly hedgerows and trees at field boundaries
- Areas of the site subject to surface water flooding
- Ecological value of existing habitats
- Residential amenity of existing dwellings
- Local vernacular and character of existing residential areas
- Transitional location of the site between built up areas and the wider countryside
- Impact on the existing highway network
- Existing adjacent electricity substation
- Buffer zone to South Staffordshire Railway Walk
- World War II gun battery
- Battery storage site

OPPORTUNITIES

- To provide access into the site from existing road network
- To create an attractive new walkable neighbourhood
- To create a high quality, distinctive and landscape led development supported by public open space and children's play areas
- To create a highly sustainable living place which offers a range of dwelling types, sizes and tenures and increases housing choice
- To make efficient use of land, though the application of a range of appropriate densities
- To create development identity areas which draw upon local vernacular and complement existing character
- Provide a fully interconnected landscape structure, based on retention of existing mature trees and hedgerows, and enhancement where necessary
- Provision of new footpath network through public open space and connectivity to existing Public Right of Way
- Potential to extend the Bhylls Acre Primary School playing fields
- Retain the World War II heritage feature
- Mitigation of impact of battery storage site



“Planning policies and decisions should ensure that developments establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit”

Para 130(d), NPPF 2021

5

VISION FOR LAND AT LANGLEY ROAD



- ① Green corridor links incorporating existing trees and hedges
 - ② Possible connection to South Staffordshire Railway Walk
 - ③ Existing landscape to be retained and enhanced where necessary
 - ④ Continuation of existing residential street
 - ⑤ Principal residential street
 - ⑥ Line of existing derelict nursery buildings to be demolished
 - ⑦ Proposed surface water attenuation areas
 - ⑧ Opportunities for habitat enhancement
 - ⑨ Protection buffer to designated nature conservation site
-
- (L) Proposed 'Local Area for Play' (LAP)
 - (LEAP) Proposed 'Local Equipped Area for Play' (LEAP)
 - (ENH) Proposed Enhanced LEAP
 - (N) Proposed Natural Play Area
-
- Existing South Staffordshire Railway Walk
 - Existing Public Footpaths
 - Proposed site entrance off Langley Road
 - Proposed emergency access from Bellencroft Gardens
 - Potential emergency access from Bellencroft Gardens
 - Proposed primary residential access road
 - Proposed secondary residential access road
 - Proposed shared surfaces
 - Proposed private driveways
 - Proposed black-top footpath
 - Proposed informal pathways through open space
-
- * Layout to respond to any existing habitable room windows' outlook

CONCEPT PLAN | NOT TO SCALE

5

INDICATIVE MASTERPLAN & DESIGN PRINCIPLES

VISION FOR LANGLEY ROAD

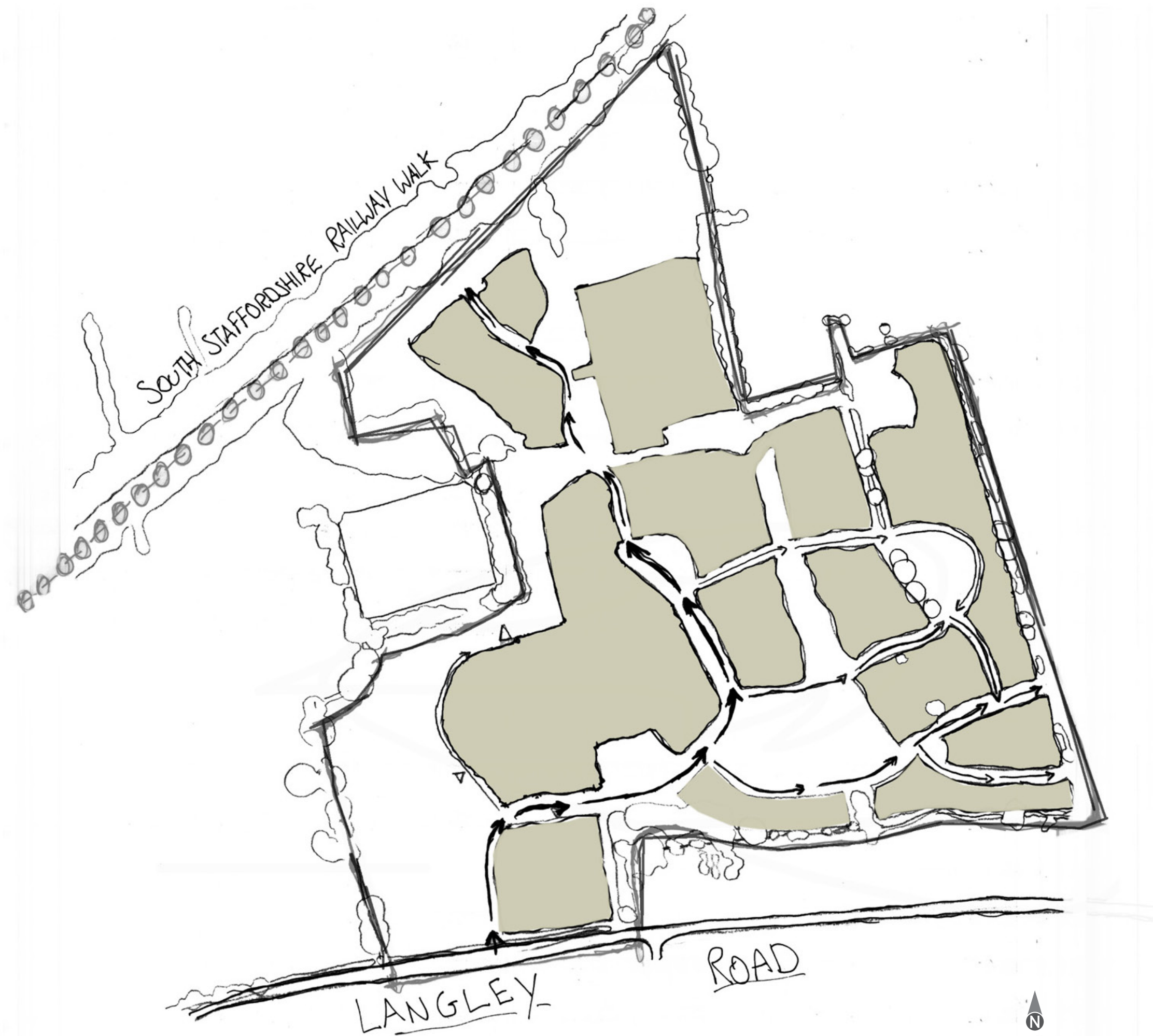
- To produce a new living environment of the highest standard, with a clear recognisable identity which is complementary to the vernacular and character of the surrounding area
- To provide the right ingredients for a balanced and sustainable new development, which provides a range of high quality homes and a range of publicly accessible open spaces
- To provide a range of new community infrastructure to benefit existing and new residents
- To establish safe, attractive and secure neighbourhoods, streets and places which promote social interaction and afford access and movement priority to pedestrians and cyclists
- To apply the practical use of environmentally friendly technology and techniques through the development, with the emphasis on carbon reduction, energy-saving and the avoidance of waste
- To provide a locally-inspired and meaningful new green space network which enhances the character of the site and natural environment and creates a robust and enduring new Green Belt boundary
- To create a place which will enhance the attraction of the Merry Hill/Castlecroft area as a place to live, incorporating aspects of local character, landscape, heritage, visual amenity and biodiversity

MAIN DESIGN PRINCIPLES

- Green corridor links incorporating existing hedges and mature trees
- Principal residential street set within green corridor connecting public open spaces and areas for play
- Potential for pedestrian/cycle link to South Staffordshire Railway Walk
- Existing landscape to be retained and enhanced where necessary, particularly relating to the existing substation and boundaries to adjoining existing dwellings
- Proposed layout to be designed sensitively in relation to existing habitats (i.e., badger sett and trees with moderate/high bat potential)
- Protection buffer (minimum 15m) to be incorporated in the northern extent of the site, in relation to the South Staffordshire Railway Walk Local Nature Reserve
- Opportunities for habitat enhancements in open space areas
- Proposed surface water attenuation (to incorporate permanent wet features and opportunities for ecological and biodiversity enhancements)
- Continuation of existing building frontage along Langley Road
- Existing derelict nursery buildings to be demolished
- Proposed areas for play, including 'Local Areas for Play', 'Local Equipped Area for Play', 'Enhanced Local Equipped Area for Play' and an area for 'Natural Play'

SUMMARY OF PROPOSALS:

- Number of dwellings provided = Approx. 390
- Approximate residential density = 35 dph
- Local Areas for Play (LAP)
- Local Equipped Area for Play (LEAP)
- Enhanced Local Equipped Area for Play
- Area for Natural Play



LAYOUT & FORM PLAN | NOT TO SCALE

LAYOUT AND FORM

MAKING EFFICIENT USE OF SPACE

- 5.1 The illustrative masterplan comprises an efficient layout of residential development cells which slot into the existing field structure. Allowance is made for the necessary offsets to address underground services, residential amenity and potential ecology.
- 5.2 Using best-practice principles, each cell comprises back to back patterns of housing, allowing for local design and highway standards. This securely encloses private rear garden spaces and provides outward facing, active frontages that naturally surveil the public realm.

Form and wayfinding

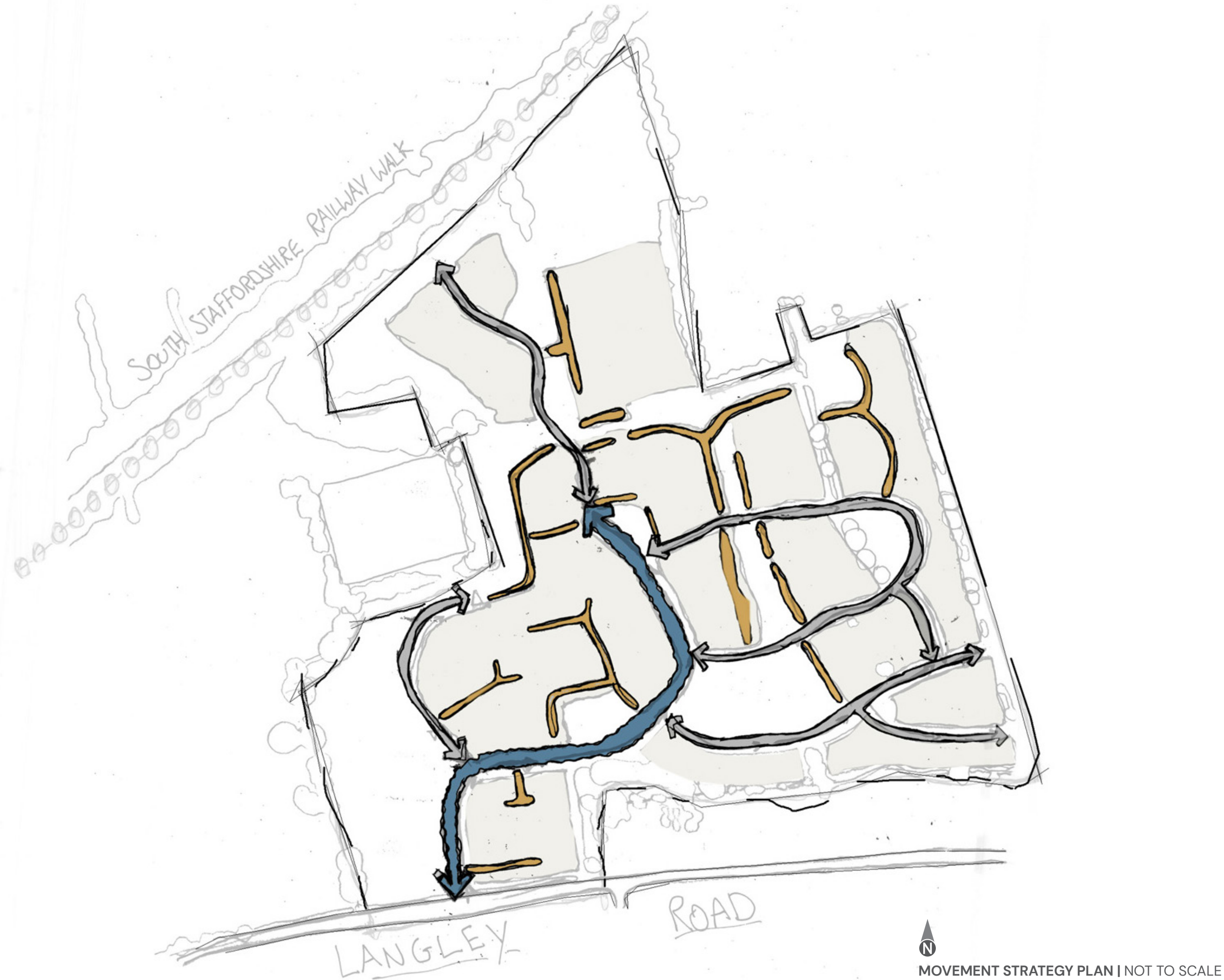
- 5.3 Building groupings, types and heights vary within each development cell to establish a series of locally inspired character areas which respond to particular areas of the site and its surroundings. However an overall identity would be achieved to complement the existing character of the Merry Hill area.

- 5.4 Building patterns focused around the principal street and development core would take a more formal, sinuous and linear form. By contrast, outer edges would be more fragmented and irregular, providing a softer transition between urban areas and the wider countryside.

- 5.5 Signature frontages and landmark buildings would be placed at critical street junctures and intersections of main green spaces. These buildings would create a series of wayfinding nodal points and identity spaces but also provide high quality gateways to signify entry points and character areas.

DENSITY

- 5.6 Taking into account the location of the site, situated between urban and landscape contexts, an average net density of around 35 dwellings per hectare has been applied.
- 5.7 The proposed density allows for the creation of a sustainable and balanced residential development comprising a mix of housing types, sizes and tenures, biased towards 2 and 3 bedroom family dwellings.



MOVEMENT STRATEGY

STREET HIERARCHY

- 5.8 The development would principally be accessed via a new T-junction off Langley Road. However, there is potential to include further pedestrian/cycle access from Bellencroft Gardens to the east of the site.
- 5.9 A hierarchy of new streets would be implemented to disperse movement around the new development. These routes would also serve to complement development character areas.
- 5.10 The hierarchy would be underpinned by a principal tree-lined street running from Langley Road to the heart of the proposed development. Higher density forms of development would generally be the focus for this street to achieve a defined, formal and sinuous route through the development.
- 5.11 Lower order, secondary streets would branch from the principal street to provide a choice of connected routes leading to new

residential areas and green space. Street junctures would be signified by high quality public realm and architecture to provide a series of distinctive and attractive way-finding places to stop and meet.

- 5.12 Private drives would service outer edges of the development, and development fronting public open green spaces. These routes would be informal and lower density, minimising vehicular movements alongside areas of public open space and potential wildlife sensitivity.

SUSTAINABLE MODES OF TRAVEL

- 5.13 The illustrative masterplan proposes a walkable new neighbourhood comprising a series of interconnected 'greenways' which crisscross the site. These routes provide a choice of attractive links for pedestrians and cyclists to access new residential areas and green space. There is also an opportunity to link the greenways to the South Staffordshire Railway Walk to the north of the site.



GREEN INFRASTRUCTURE

NATURAL GREENWAYS

5.14 The proposed green space network comprises a series of naturalised green spaces (greenways) which provide ribbons of nature through new residential areas. Influenced by existing field boundaries, landscape and the location of existing services, these spaces would provide linear corridors of informal amenity space and new habitat areas with the aim of engaging users with nature by providing an educational resource as well as an informal outdoor learning environment.

5.15 The primary aim of green infrastructure is to:

- Provide education and promote local care and understanding of local ecology, as well as an educational resource;

- Provide recreational space for exercise and enjoyment of nature, as well as the opportunity for tranquility away from built up areas;
- Provide a place for wildlife to live and thrive; • Contribute an attractive green element to the image of an area, raising the quality of people's everyday living and working environments;
- Provide sustainable drainage and wetland habitats;
- Provide a transient green environment for walkers and cyclists alike;
- Provide view corridors and information boards to provide a visual connection to the wider townscape and sky line features; and
- Retain and safeguard existing landscape elements and provide a robust and enduring new Green Belt boundary



“Planning policies and decisions should ensure that developments optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks”

Para 130(e), NPPF 2021

6

SUMMARY & CONCLUSION



6

SUMMARY & CONCLUSION

- 6.1 This Promotional Document demonstrates that there is a need to accommodate an increased amount of housing land within the Green Belt and there are exceptional circumstances that exist for the targeted release of Green Belt land as part of the Local Plan Review in order to meet this identified need.
- 6.2 The site presents an exceptional opportunity to deliver approximately 330 new market and affordable dwellings to meet the future housing need of South Staffordshire without undermining the purposes of the Green Belt or adversely impacting upon the environment.
- 6.3 In summary, this promotional document has illustrated that the site would:
 - Positively contribute to the identified need for new housing and create a range and mix of housing types that will make a positive contribution to the District's housing requirements by providing a mix of types and tenures of dwellings, including new affordable homes;
 - Represent a logical and natural extension to the existing urban area that has strong physical boundaries and is well-contained;
 - Be sustainably located on the edge of Wolverhampton and within proximity to a wide range of local facilities and services, with local centres at Castlecroft, Merry Hill and Warstones Road all located within a 0.5-mile radius of the site
 - Accommodate a high quality residential development that nestles within the surrounding landscape and green space network;
- 6.4 The identification of the site in Regulation 19 Local Plan as a sustainable location for new housing development has been fully established and the exceptional circumstances to remove the site from the Green Belt has been met. As a result, it represents a sound allocation in the Emerging Local Plan.
 - Deliver an overall development vision for the site that provides a well-designed and sympathetic development in a sustainable location on the edge of Wolverhampton
 - Generate growth and provide significant social benefits as well as benefits to the local economy, including construction spend and investment generated by new residents; and
 - Have no identified technical or environmental constraints that will prevent its delivery



DESIGN



ENVIRONMENT



PLANNING



ECONOMICS



HERITAGE

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