

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

LAND OFF STRAWMOOR LANE, CODSALL

REPRESENTATION PREPARED ON BEHALF OF

RICHBOROUGH ESTATES

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Contents.

1. Introduction.....	1
2. Planning Policy Context.....	3
3. Vision, Strategic Objectives and Priorities	5
4. Development Strategy	6
5. Site Allocations- Policy SA5 and Sustainability Appraisal Comments.....	14
6. Development Management Policies.....	16
7. Sustainability Appraisal	29
8. Land off Strawmoor Lane	34
9. Conclusion.....	50

Appendix

Appendix 1- Site Location Plan

Appendix 2- Site Promotion Document



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 Land off Strawmoor Lane, Codsall, which is being promoted for residential-led development. An Illustrative Masterplan is included at Appendix 1 to this Representation.
- 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; this Vision Document is attached to these representations at Appendix 2 for completeness.
- 1.4. 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.

- 1.5. 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. Site's such as Land off Strawmoor Lane, Codsall, could provide key safeguarded land which could assist the Council in their long-term strategy for housing.
- 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 SSDC 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. The Land off Strawmoor Lane, Codsall, (assessed under site reference 630 a and b) would make a positive contribution to South Staffordshire's housing allocations with a proposed minimum capacity of 185 dwellings. The site is also sustainably located adjoining the Tier 1 settlement of Codsall, where development in accordance with Policy DS5 is to be supported.
- 4.19. Should South Staffordshire District Council not consider the site currently appropriate for development, as discussed earlier in this representation, Richborough Estates suggests that SSDC safeguards land within the Green Belt. The site at Strawmoor Lane would represent a logical extension to the existing built-up form of Codsall
- 4.20. 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.
- 4.21. 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.
- 4.22. 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.

4.23. 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.

4.24. 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.

4.25. 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 October 2022, Quod 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.

4.26. 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.

- 4.27. 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.
- 4.28. 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.

Economic Uplift and Housing Figures

- 4.29. 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.
- 4.30. 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 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.
- 4.31. 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'.
- 4.32. 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 underestimated 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

- 4.33. 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.

Longer Term Growth Aspirations for a new settlement- Policy DS6

- 4.34. 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.
- 4.35. 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.

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. South Staffordshire District Council at Strategic Objective 2 identify that housing growth will be located at the Districts most sustainable locations to facilitate growth and assist in meeting the wider unmet housing needs. The Land off Strawmoor Lane (Site Ref 630 a and b) represents a logical and sustainable extension to this Tier 1 settlement and provides an opportunity for delivering a minimum of 185 homes with associated supporting infrastructure. Due to the size of the site, flexibility exists in terms of the extent of the site which may come forward for development which are discussed further in Chapter 8 of this representation.
- 5.3. The Housing Site Selection Topic Paper- Appendix 2 indicates that the site is '*ok in principle subject to significant highway improvements*'- would require new road linking Strawmoor Land to Wood Road junction'. Richborough Estates dispute this given the post-mitigation assessment as identified in the SA 2021 sets out that the site has a Minor Negative in regard to Transport and Accessibility. It should also be noted that any planning application which would be submitted would be accompanied by a transport assessment which would inform the proposed masterplan. Furthermore, Richborough Estates would work closely with the Council to ensure the development would not result in any adverse impacts upon the existing road network as part of the planning application.
- 5.4. The Site at Land off Strawmoor Lane, as discussed further in Chapter 8 of this Representation would make a valuable and logical allocation in the Local Plan. Its location adjoining the Tier 1 settlement of Codsall means that it is accessible to the variety facilities available in the village.



5.5. Richborough Estates support 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. If the site was removed from the Green Belt a new long term and enduring Green Belt boundary could be established following the field boundary to the west of the area identified for housing development in the masterplan.

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 consultation¹ 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,

¹ 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 dwellings 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 West of Wrottesley Park Road, 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 and 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:

6.66. '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.'

6.67. 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.

6.68. 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.

- 6.69. 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 in 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.
- 6.70. 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.
- 6.71. 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 Consulting². 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.

² 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 -	<p>The size, nature and location of development proposals would be likely to:</p> <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	<p>Either no impacts are anticipated, or any impacts are anticipated to be negligible</p>
Uncertain +/-	<p>It is entirely uncertain whether impacts would be positive or adverse</p>
Minor Positive +	<p>The size, nature and location of a development proposal would be likely to:</p> <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 ++	<p>The size, nature and location of a development proposal would be likely to:</p> <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 at Moatbrook Lane– Site Ref: 630a and 630b

7.5. Land off Strawmoor Lane, Codsall is considered within the SA as two separate land parcels, but both are known as 'Land at Moatbrook Lane'- Site Ref: 630a and b. This includes an assessment of the nature and magnitude of the impact of the development, both pre- and post-mitigation. These assessments are reproduced in Figures 7.1 and 7.2 below.

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
630a	+/-	+	+/-	--	0	-	+	-	-	-	--	-
630b	+/-	--	+/-	--	-	-	+	-	-	-	--	-

Figure 7.1: Significance of effects pre-mitigation, Site Ref: 630 a and b

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
630a	+/-	+	0	--	0	-	+	-	0	-	--	-
630b	+/-	0	0	--	-	-	+	-	0	-	--	-

Figure 7.2: Significance of effects post-mitigation, Site Ref: 630 a and b

- 7.6. Richborough Estates disputes elements of the above scoring, particularly the finding that developing the Site would result in a Major Negative impact upon Landscape and Townscape.
- 7.7. The SA sets out that site is considered to result in a 'moderate-high' harm to the Green Belt, as supported by the conclusion within the Green Belt Study which supports the Local Plan review. Parcels 630a and 630b are also found as being of 'moderate-high' landscape sensitivity.
- 7.8. Similarly, the site is identified as having 'minor negative' impacts in relation to views from the public right of way network, views for local residents, urbanisation of the countryside and coalescence.

- 7.9. Given that neither the Green Belt harm or sensitivity identified within the Study are not the 'maximum' level that might be found and given all other aspects of landscape are considered to be 'Minor Negative', it is not understood how the SA considers the overall harm of both sites translates into a 'Major Negative' impact upon Landscape and Townscape. Not only is this considered inaccurate regarding the summary of Green Belt impact, but it also implies that the consideration of Green Belt impact carries significantly greater weight than other landscape considerations in the overall assessment of impact upon Landscape and Townscape.
- 7.10. It is contended that the SA impact score should duly be tempered to a Minor Negative ('-') score for both sites.
- 7.11. Richborough Estates also disputes the Major Negative post mitigation score regarding Education. The site is within proximity to St Nicholas CE First School. The site is also and within a 1.6km distance from Codsall Community High School and whilst this is outside of the ideal 1.5km distance from a secondary school the site is certainly within close proximity to educational facilities. Therefore, it is contended that the SA impact score should duly be tempered to a Minor Negative score for both sites.
- 7.12. Richborough Estates also disputes the Negligible ('0') post-mitigation score attributed to parcel 630b regarding Climate Change Adaptation, which includes considerations surrounding flood risk. The SA indicates that this parcel could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate pluvial flood risk in surrounding locations, resulting in a major negative impact on pluvial flood risk. Conversely, it is the position of Richborough Estates that development on the parts of the site which fall within Flood Zone 1 represent an opportunity to design and provide a suitable surface water drainage scheme which stores rainfall at an improved rate when compared against the existing 'greenfield' position. This would accordingly be a benefit of the development and should accrue a Minor Positive ('+') score, as is attributed to site 630a.

8. Land off Strawmoor Lane

Site Description

- 8.1. Richborough Estates has current land interests in land known as Land off Strawmoor Lane (site reference 630 a & b), as shown on the Site Location Plan appended to this representation (Appendix 1).
- 8.2. The site comprises approximately 19 hectares of land, made up of four field parcels, located either side of Moatbrook Lane and to the east of Strawmoor Lane. This land represents a logical and sustainable extension to the existing Category 1 settlement of Codsall and has the capacity to deliver approximately 200–250 dwellings and supporting infrastructure.
- 8.3. The site is located within the West Midlands Green Belt, but immediately adjacent to the built-up area of Codsall.
- 8.4. Natural England's Land Classification Map for the West Midlands Region (ALCO04) shows that the site comprises a mix of undefined Grade 3 'Good to Moderate' quality agricultural land and Grade 4 'poor' quality agricultural land.
- 8.5. The site has no other environmental or historical designations.

Illustrative Masterplan

- 8.6. An illustrative masterplan has been prepared to introduce an initial proposal, providing an indication of how the site could be delivered and function as a natural sustainable, extension to Codsall.
- 8.7. The Illustrative Masterplan identifies the following key features:
 - Approximately 230 dwellings, including a policy compliant level of affordable housing and a mixture of sizes and tenures;
 - Provision of approximately 7 hectares of public open space, including proposed attenuation areas;

- Creation of a new road, connecting Wood Road with Moatbrook Lane and Strawmoor Lane;
- Provision of access from Strawmoor Lane which is proposed to be widened;
- Significant provision of Green Infrastructure to include a landscape mitigation strategy and footpath links to the wider open space areas;
- Provision of SuDS through the delivery of new attenuation features; and
- A new enduring Green Belt boundary to the western edge of the site.

Sustainability

8.8. The site is sustainably located immediately adjacent to the built-up area of Codsall. 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.

8.9. 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.

8.10. The overall settlement hierarchy scoring for Codsall is presented below.

Access to convenience stores/ supermarkets	
Diversity of other accessible community facilities/ services	

Retail Centres Study	
Access to employment locations	
Access to primary/ first school within settlement	
Access to secondary/ high school within settlement	
Access to 6th form/college within settlement	
Public transport access to higher order services outside of the village	

Table 8.1: Settlement Hierarchy Scoring for Codsall, RSFA (2021)

8.11. Richborough Estates supports the findings of the RSFA in relation to Codsall.

Green Belt

8.12. In August 2022, SSDC 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.

8.13. 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.

8.14. 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.

8.15. 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

8.16. 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 Strawmoor Lane: Contributions to Green Belt Purposes

8.17. The Green Belt Study shows Land off Strawmoor Lane, Codsall, as falling within Green Belt Sub-Parcel Ref S51B – ‘Northwest of Codsall’, which is identified as making the following contribution to the five purposes of the Green Belt:

GB Purpose	Assessment	Rating
P1: Checking the unrestricted sprawl of large built-up areas	Land contains no or very limited urban development and has strong openness. It is close enough to the large built-up area to have some association with it, but also retains some distinction	Moderate
P2: Preventing the merging of neighbouring towns	Land lies between the West Midlands conurbation and Albrighton. However, there is sufficient distance between the two for each town to retain its own distinct landscape setting.	Moderate

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 8.2: Land Parcel S51B Contribution Towards Green Belt Purposes

8.18. The Study goes on to identify that, should Green Belt Sub-Parcel ref: S51B (within which Land off Strawmoor Lane falls) be released for development, the resulting harm would be 'moderate-high', stating:

'The sub-parcel makes a strong contribution to preventing encroachment of the countryside and a moderate contribution to checking the sprawl of the West Midlands conurbation and preventing the merger of towns. Land to the north of the railway line and south of Moatbrook Lane has a higher degree of containment by urban edges than land to the south, but the Moat Brook and its associated flood zone and tree cover also create a distinction from the inset area to the east. Strawmoor Lane would form a clear alternative Green Belt boundary to the west, but the existing inset edges are also clearly defined, and expansion to the north of Wood Road would constitute a weakening of the existing inset edge. Although the houses between Moatbrook Lane and Wood Road represent some expansion beyond Moat Brook the watercourse still represents some distinction in terms of the relationship between settlement and countryside to the north and west of Bilbrook and Codsall.'

Harm Ratings Overview Map of Land within Sub-Parcel

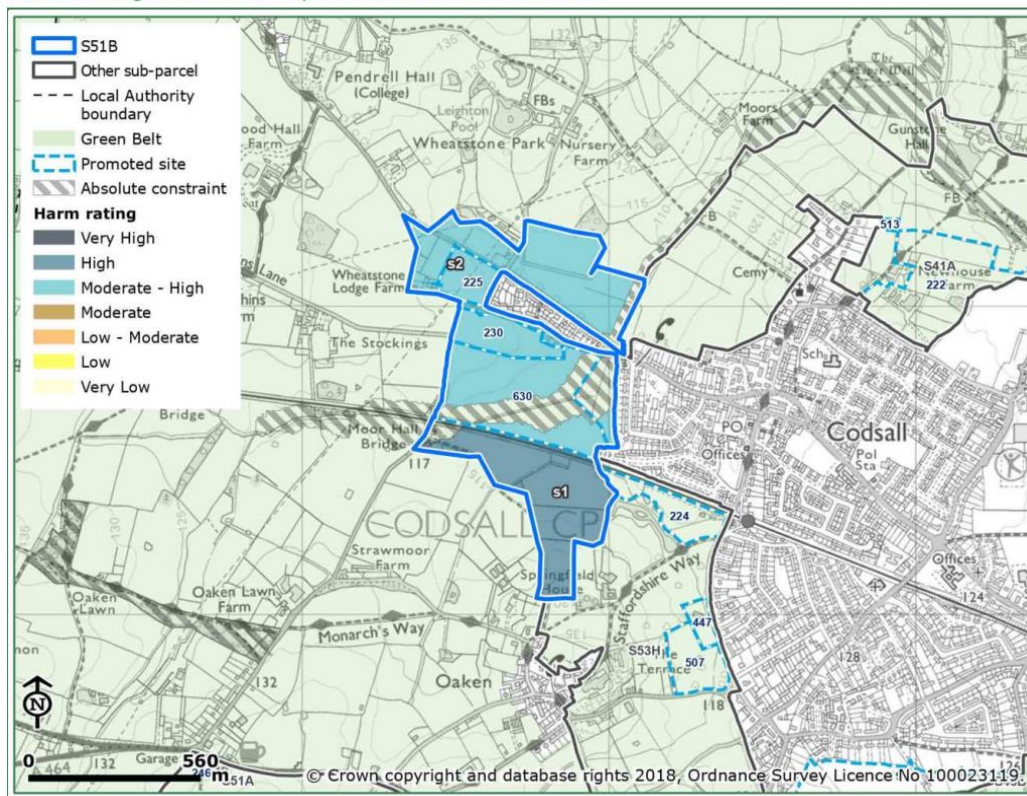


Figure 8.1: Harm Rating for Land Parcel S51B

8.19. Whilst the conclusions of the above assessment are noted, it remains that Land off Strawmoor Lane 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

8.20. The harm assessment for Green Belt sub-parcel S51B indicates that the parcel makes a ‘moderate’ contribution to preventing the sprawl of the West Midlands conurbation. However, as set out above, paragraph 3.15 of the Green Belt indicates that Codsall/Billbrook is not considered to form part of the West Midlands conurbation. It is therefore not understood how the Green Belt parcel can make a moderate contribution in preventing its sprawl,

particularly when the parcel is located on the western side of Codsall i.e., the side furthest away from the conurbation.

- 8.21. The majority of the site is located to the south of a number of existing dwellings, located between Wood Road and Moatbrook Lane. Furthermore, a number of agricultural buildings exist between Moatbrook Lane and Wood Road, as well as adjacent to Chillington Lane and Slate Lane. The identified site boundary aligns with these existing features and, as such, its development would not result in sprawl away from Codsall. Indeed, the Concept Plan illustrated later within this representation only shows limited development beyond Slate Lane, in line with the existing agricultural buildings at Chillington Lane. Development in this manner would accordingly serve to 'round off' the settlement and not result in the sprawl of Codsall beyond its current extent.
- 8.22. It is therefore considered that the parcel makes a 'weak/no' contribution to the checking the unrestricted sprawl of large built-up areas, rather than the 'moderate' contribution identified within the Green Belt Study.

To Prevent Neighbouring Towns from Merging into One Another

- 8.23. The removal of the site from the Green Belt would amount to a negligible reduction to the separation distances between the built-up area of Codsall/Billbrook and the nearest neighbouring town.
- 8.24. As set out above, the identified site boundary aligns with existing urbanising features to the western edge of Codsall. The site accordingly does not serve a purpose in terms of maintaining separation between Codsall and the nearest neighbouring town. Furthermore, the site's western boundary is currently defined by a mixture of features, including: hedgerow, sporadic trees and Strawmoor Lane. The development of the site for residential purposes accordingly represents an opportunity to strengthen this boundary to provide one which would endure in the long-term.
- 8.25. Richborough Estates therefore agrees with the conclusions of the Green Belt Study, that the site makes a 'weak/no' contribution to preventing neighbouring towns from merging into one another.

To Assist in Safeguarding the Countryside from Encroachment

- 8.26. By definition, development of any greenfield site beyond the boundary of a settlement results in encroachment into the countryside. Nevertheless, as set out above, the identified site boundaries align with existing residential or agricultural buildings to the western edge of Codsall. There are, therefore, clear urbanising features surrounding the site, reducing the extent to which the site encroaches into the open countryside.
- 8.27. Again, as set out above, the site's western boundary is currently defined by a mixture of features. The development of the site for residential purposes represents an opportunity to strengthen this boundary to provide one which would endure in the long-term, creating a clear transitional arrangement between the urban area and the countryside.
- 8.28. Lastly, the site is currently in private ownership and no public rights of way exist across it. As such, the site does not offer any opportunities for recreation. The Concept Plan illustrated later within this representation includes significant areas of open space, particularly to the south-east of the site, increasing opportunities for recreation and promoting access into the countryside.
- 8.29. 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

- 8.30. There are no listed buildings or other heritage assets within the vicinity of the site. Similarly, Codsall as a settlement has a limited number of listed buildings, located to the centre of the settlement and around St Nicholas C of E Church. Codsall is accordingly not considered to constitute an 'historic town' in the context of the NPPF. As such, the development of the site for residential purposes would not compromise the setting or special character of an historic town.
- 8.31. Richborough Estates therefore 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

8.32. Whilst it is acknowledged that all Green Belt land makes a contribution 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. The release of the site from the Green Belt and allocation for residential development would therefore not significantly prevent the recycling of derelict land and other urban land.

8.33. 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

8.34. Overall, it is therefore considered that Land off Strawmoor Lane, Codsall, 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: S51B. This contribution is summarised in the table below:

GB Purpose	Previous Rating	Revised Rating
P1: Checking the unrestricted sprawl of large built-up areas	Moderate	Weak / No contribution
P2: Preventing the merging of neighbouring towns	Moderate	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 Strawmoor Lane, Green Belt Assessment

Green Belt

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

8.36. It is the view of Richborough Estates that the site makes a weak/no contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. The site would form a logical location for the expansion of the settlement edge, with the existing site boundaries representing strong defensible boundaries for the Green Belt edge in the future.

8.37. Therefore, release of this site would constitute a limited weakening of the Green Belt.

Landscape Sensitivity

8.38. South Staffordshire District Council has produced a Landscape Study (2019) which forms part of the Local Plan Review evidence base. Land off Strawmoor Lane falls with Landscape Parcel Reference: SL36S2. These two landscape parcels subsequently fall within the 'Ancient Clay Farmlands' Landscape Character Type. The area is located north west of Wolverhampton, on the western outskirts of Codsall and extends to the village of Oaken.

8.39. 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 to the north of the railway are larger in scale.	Generally small pastoral fields well defined by hedgerows, with frequent mature field and hedgerow trees which increase the sense of intimacy.
Landform		Landform to the north of the railway line is more gently undulating.	Sloping landform which rises sharply from the edge of Codsall at 115m AOD, to the village of Oaken at 140m AOD.
Landscape pattern and time depth			The landscape south of the railway line is characterised by 19th century parkland associated with

			country houses built for local industrialists and small pastoral fields (identified as post-1880s replanned enclosure). Larger 18th/19th century planned enclosure are found north of the railway line and a small area of irregular post-medieval enclosure either side of Wood Lane. The landscape pattern has remained largely unchanged from the 1880s edition OS, resulting in strong time depth.
'Natural' character		Areas of semi-natural habitats include Priority Habitat deciduous woodland on the edge of Oaken and along stream corridors. Valued natural features include the predominance of mature parkland trees, intact hedgerows, and hedgerow trees.	
Built character	Two overhead electricity routes cut through the north western corner and the railway line runs east-west through the centre of the area.	Built features within the landscape area include residential properties on the settlement edge of Oaken and Codsall and a few farms.	The parkland landscape to the south of the railway line within the Codsall Billbrook and Oaken Conservation Area is associated with two unlisted 19th century country houses, The Terrace at Oaken and Springfield House.
Recreational character	The north of the area is not publicly accessible.		The parkland to the south has open access and is crossed by the Staffordshire Way Long Distance Recreational Route.
Perceptual aspects	Two overhead electricity routes introduce an urbanising element, whilst noise from passing trains may also detract from the perceptual qualities of the area.		The area has a strong rural character, extending from the parkland to the south to the working agricultural landscape to the north.

<p>Settlement setting</p>		<p>Although ribbon development along Wood Road and Moatbrook Lane present a weaker edge to the settlement, strong hedgerows, and woodland belts along these roads and around Moatbrook Playing Fields provide a strong barrier feature.</p>	<p>The area provides a rural setting for Codsall and Oaken, particularly within the Codsall Billbrook and Oaken Conservation Area, which provides an important rural gap between the two settlements.</p>
<p>Visual prominence</p>			<p>The slopes surrounding Oaken are visually prominent within the local landscape.</p>
<p>Inter-visibility with adjacent designated landscapes or promoted view points</p>	<p>There is no inter-visibility with adjacent sensitive landscapes or marked viewpoints.</p>		
<p>Landscape Sensitivity Judgement (SL36 S2)</p>	<p>Areas north of the railway line have moderate-high sensitivity to residential development, as land here is larger in scale, less visually prominent and locally influenced by the intersecting pylon route. However, this is counterbalanced by strong landscape pattern and strongly vegetated settlement edge.</p>		<p>Moderate-High</p>

8.40. The Study concludes that Landscape Parcel SL36S2 (which encompasses Land at Strawmoor Lane) is considered to have a 'moderate-high' overall sensitivity to residential development, as identified on Figure 8.2 below.

Landscape Sensitivity Rating

8.41.

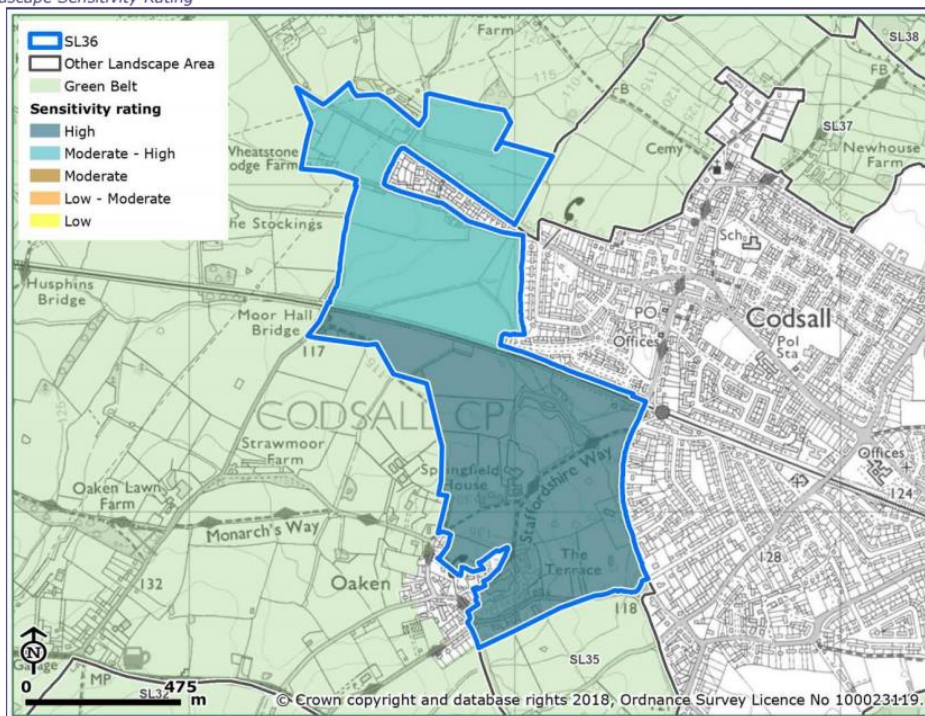


Figure 8.2: Landscape Sensitivity Rating Parcel SL36

8.42. The findings of the Landscape Study for the wider parcel are not necessarily disputed by Richborough Estates. Nevertheless, the site itself relates physically and visually to the existing settlement edge of Codsall, in conjunction with the presence of features such as the railway line to the south, which collectively detract from the overall landscape sensitivity of the site.

8.43. Nevertheless, Richborough Estates remains of the view that land off Strawmoor Lane performs better in landscape terms than the wider parcels within Landscape Parcel SL36S2. The site relates physically and visually to the existing settlement edge of Codsall. The proposed development will not result in the addition of uncharacteristic or incongruous features. Views of the site are limited and localised and all feature urban influences, with the railway line and associated vegetation to the south further restricting distant views. These features detract from the overall landscape sensitivity of the site.

8.44. The Illustrative Masterplan contained within the submitted Promotional Document offers a significant opportunity to enhance the landscape fabric and character of the site through the retention of the existing trees and hedgerows and the creation of new public open space.

Availability

8.45. As a collection of landowners, Richborough Estates has demonstrated, through the submission of this site through the Call for Sites consultation, that they are supportive of the development of the site to deliver much needed new homes.

8.46. As such, this call for sites submission confirms that there is nothing to prevent this site from being delivered immediately upon its removal from the Green Belt and the receipt of the necessary consents. The site can therefore be considered to be available.

Impact on the Historic Environment

8.47. There are no listed buildings or conservation areas located in the immediately vicinity of the site. However, the Codsall and Oaken Conservation Area 'Buffer Zone' is located immediately beyond the southern boundary of the site.

8.48. The Illustrative Layout Plan included as part of this representation demonstrates how, due to flood risk and drainage constraints, development will be located in the northern and central areas of the site. This will result in the provision of an additional buffer adjacent to the Conservation Area Buffer Zone, further preserving the setting of the Conservation Area.

8.49. There are therefore no heritage constraints to the allocation of the site for residential development.

Surface Water Flooding

8.50. The majority of the site is located within Flood Zone 1 (the area at least risk from flooding). A smaller area of the site to the south is located within Flood Zones 2 and 3. These areas are not proposed to be developed and would be retained as public open space. The SuDS proposed for the site would also be located beyond these areas.

8.51. A water course enters the site from the west, flowing eastwards, exiting through the eastern boundary. Anecdotal evidence suggests areas adjacent to this water course are seasonally wet. However, again, development is not proposed in these areas. The development of the site and formalisation of a drainage scheme would also serve to improve the occasional highway flooding that is understood to occur by managing the surface-water run-off in a more sustainable way.

8.52. The topography of the site supports the use of gravity storm drainage, with the site gently falling towards existing water courses. It is anticipated that a pumping station will be required

on the site to accommodate foul drainage, the location of which will be determined at planning application stage.

Highways

- 8.53. It is proposed to extend Strawmoor Lane northwards to serve the northern parcel of land, meeting Wood Lane at a priority junction and providing a more attractive route to Wood Lane for traffic, rather than along Slate Lane, from the development proposal and elsewhere. This would also satisfy the comments made within the Housing Site Selection Paper Appendix 2 Highways Comments which identifies the site is suitable for development subject improvements to the highway including a new road linking Strawmoor Lane to Wood Road Junction.
- 8.54. The main vehicle access to the main body of the development will be from Strawmoor Lane in the form of a priority junction, with Moatbrook Lane forming a priority crossroads junction with Strawmoor Lane and on through the northern development parcel to Wood Lane. A separate pedestrian access is provided to Moatbrook Lane in the northeast corner of the site. The land required to facilitate the widening and improvements to both Moatbrook Lane and Strawmoor Lane is fully under the control of Richborough Estates.
- 8.55. The site access points can accommodate a refuse lorry, which is typically the largest vehicle that might be expected to access the site on a weekly basis.
- 8.56. A development of around 230 dwellings would be expected to generate around 120 two-way peak-hour vehicle trips, i.e two trips per minute. The majority of traffic is expected to head north along Strawmoor Lane. The site access strategy can easily accommodate such levels of traffic and the impact of the development traffic is such that it will not be unduly perceptible to existing road users on the wider highway network.

Suitability

- 8.57. The information set out above demonstrate that the Strawmoor Lane site is a suitable site for development.
- 8.58. It is submitted that the site serves a reduced function against the five purposes of the Green Belt and that many of the potential impacts of development can be suitably mitigated and addressed the Council's comments regarding highways.



Deliverability

- 8.59. The information set out above demonstrates that Land off Strawmoor Lane, Codsall is a suitable site for development.
- 8.60. A considerable amount of technical work has been undertaken to consider deliverability of this site. Richborough Estates can confirm that this work demonstrates that there are no constraints likely to render the site undeliverable in the plan period. The site is available now.
- 8.61. There are no existing uses that would require relocation and no issues of contamination that would require remediation. The impacts of development can be mitigated, and, in many cases, a positive outcome can be achieved.
- 8.62. The site is deliverable and immediately available and subject to allocation, could deliver homes within the next 5 years. The allocation of smaller sites such as Land off Strawmoor Lane will serve to balance SSDC's overall housing land supply.



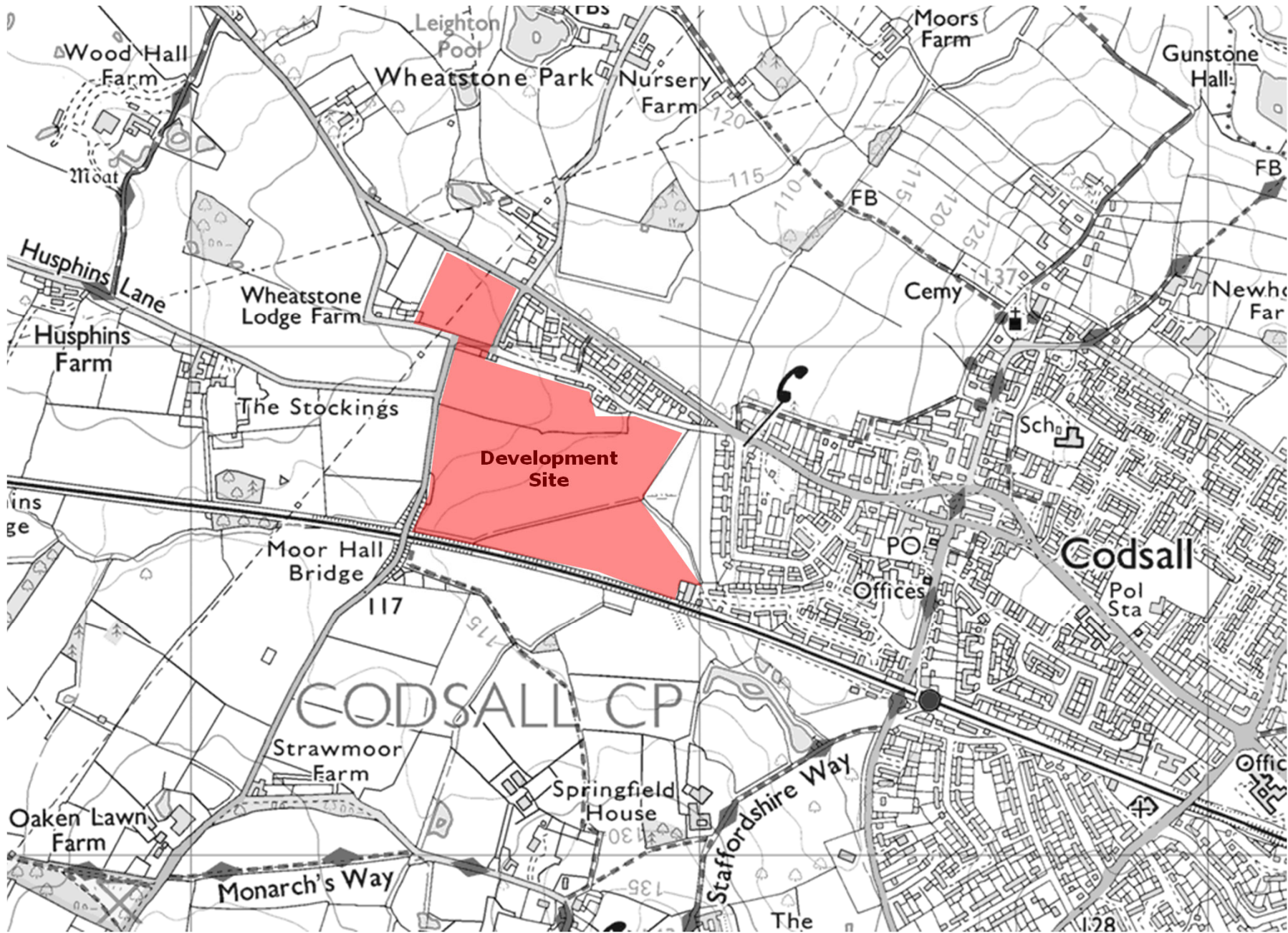
9. Conclusion

- 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 Strawmoor Lane, 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 off Strawmoor Lane.
- 9.3. The information contained within this representation, read in conjunction with the appended Site Location Plan and Promotional Document, demonstrates that Land off Strawmoor Lane is a suitable and deliverable site for residential development, subject to its release from the Green Belt and should be allocated for housing in the South Staffordshire Local Plan review under Policy DS5. However, if the site is not included as an allocation, it should be removed from the Green Belt and safeguarded to meet the longer-term need for housing in the District including that coming from the GBBCHMA.
- 9.4. Richborough Estates considers that their land interests Land off Strawmoor Lane, Codsall, 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

Site Location Plan



Not to Scale
 Land off Strawmoor Lane
 Codsall
T18571 - Figure 1.1
Site Location Plan

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Appendix 2

Site Promotion Document



LAND AT STRAWMOOR LANE
CODSALL

SITE PROMOTION DOCUMENT

PREPARED ON BEHALF OF RICHBOROUGH ESTATES LTD BY



“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”



CONTENTS

- 01 INTRODUCTION & DOCUMENT PURPOSE
- 02 PLANNING POLICY CONTEXT
 - SUMMARY OF PLANNING POLICY AND GUIDANCE
 - HOUSING AND EMPLOYMENT NEED
 - CASE FOR GREEN BELT RELEASE
 - FIVE PURPOSES OF GREEN BELT
- 03 SITE & SURROUNDINGS OVERVIEW
- 04 ENVIRONMENTAL CONSIDERATIONS
 - LOCAL FACILITIES
 - ACCESS AND MOVEMENT
 - HERITAGE AND ARCHAEOLOGY
 - LANDSCAPE AND VISUAL VIEWS
 - FLOOD RISK AND DRAINAGE
 - ECOLOGY
 - SUMMARY OF ANALYSIS
- 05 VISION, CONCEPT PLAN AND DESIGN PRINCIPLES
 - ACCESS AND MOVEMENT
- 06 SUMMARY AND CONCLUSION



SITE LOCATION PLAN

01 INTRODUCTION & DOCUMENT PURPOSE

INTRODUCTION

1.1 The land at Strawmoor Lane represents a logical and appropriate extension to the top tier settlement of Codsall. 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 community 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 Strawmoor Lane. The extent of land controlled by Richborough is shown edged red on the Site Location Plan on page 2.

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 2037. 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 Strawmoor Lane will form a logical extension to Codsall 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 This document has been prepared with input from the following Consultant team:

PLANNING
Pegasus Group



URBAN DESIGN
Woods Hardwick Ltd



LANDSCAPE
Tyler Grange



ECOLOGY
RammSanderson



ACCESS & MOVEMENT
Hub Transport Planning



FLOOD RISK AND DRAINAGE
BWB



HERITAGE
CgMs




LAND PROMOTER
Richborough Estates



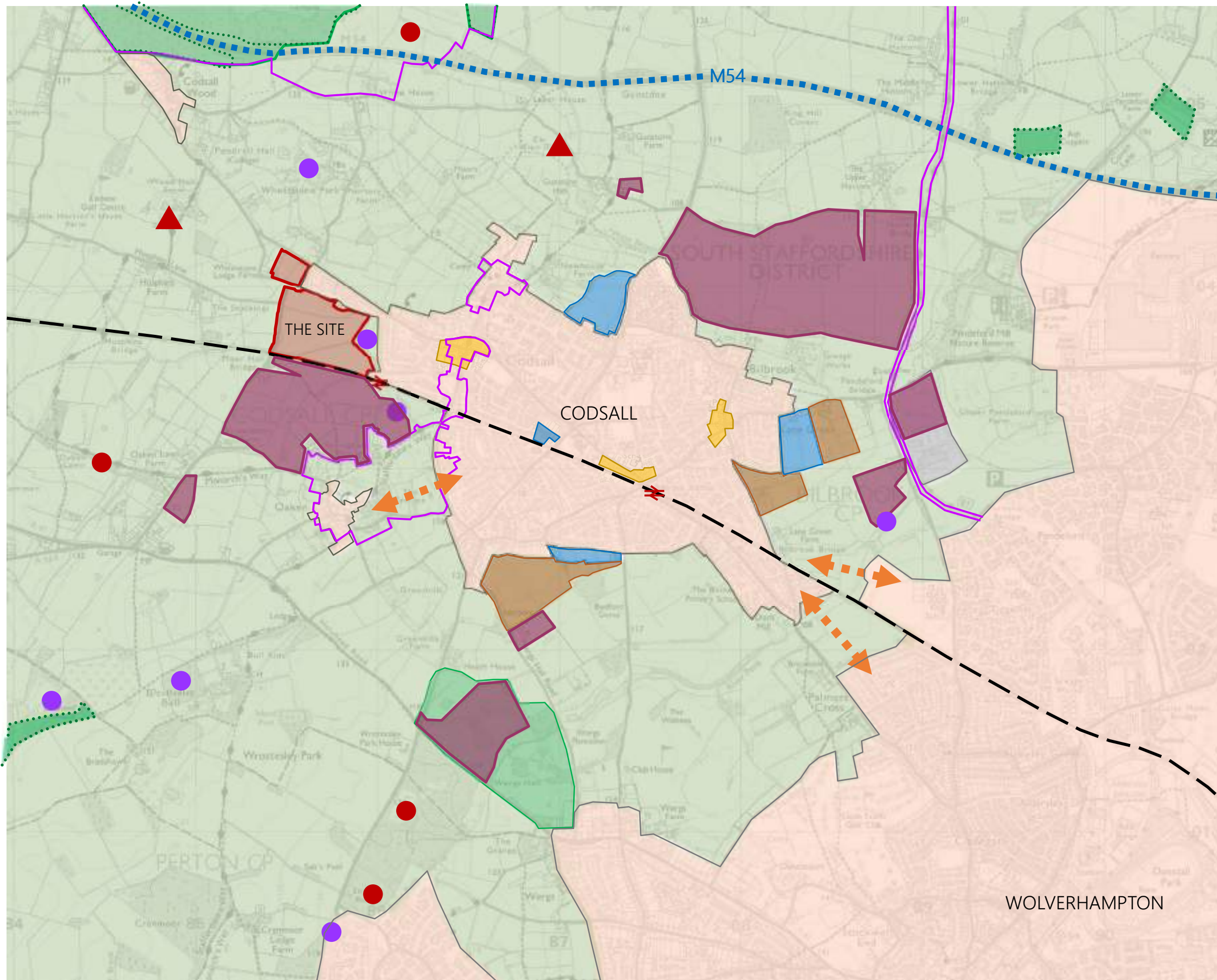


“Planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development”



02

PLANNING POLICY
CONTEXT



- KEY**
- THE SITE
 - BUILT UP AREAS
 - SETTLEMENTS WITHIN CLOSE PROXIMITY OF ONE ANOTHER
 - RAILWAY LINE
 - M54 MOTORWAY
- DEVELOPMENT POLICIES**
- SOUTH STAFFORDSHIRE GREEN BELT
 - CONSERVATION AREA
 - HISTORIC LANDSCAPE AREA
 - ANCIENT WOODLAND
 - SAFEGUARDED LAND
 - HOUSING ALLOCATION SITES
 - VILLAGE/NEIGHBOURHOOD CENTRE
 - EXISTING EMPLOYMENT SITE
 - BIOLOGICAL ALERT SITE
 - SITES OF BIOLOGICAL INTEREST
 - ANCIENT MONUMENTS
- SHELLA 2018**
- SITES CONSIDERED UNSUITABLE FOR DEVELOPMENT

PLAN ILLUSTRATING SITE LOCATION, CONTEXT AND SOUTH STAFFORDSHIRE DEVELOPMENT PLAN DESIGNATIONS

02 PLANNING CONTEXT

INTRODUCTION

2.1 There is an exceptionally strong case to support amendments to the Codsall and Billbrook Green Belt boundary and for releasing the site for residential development.

PLANNING POLICY CONTEXT

National Planning Guidance

2.2 In February 2019, the Government published a revised National Planning Policy Framework ("Framework") which replaces the previous guidance published in 2018 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.

2.3 Paragraph 136 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 134 of the Framework.

2.4 Furthermore, paragraph 8 of the Framework sets out that sustainable development has three overarching objectives: economic, social and environmental. 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 Strawmoor Lane, Codsall, 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.

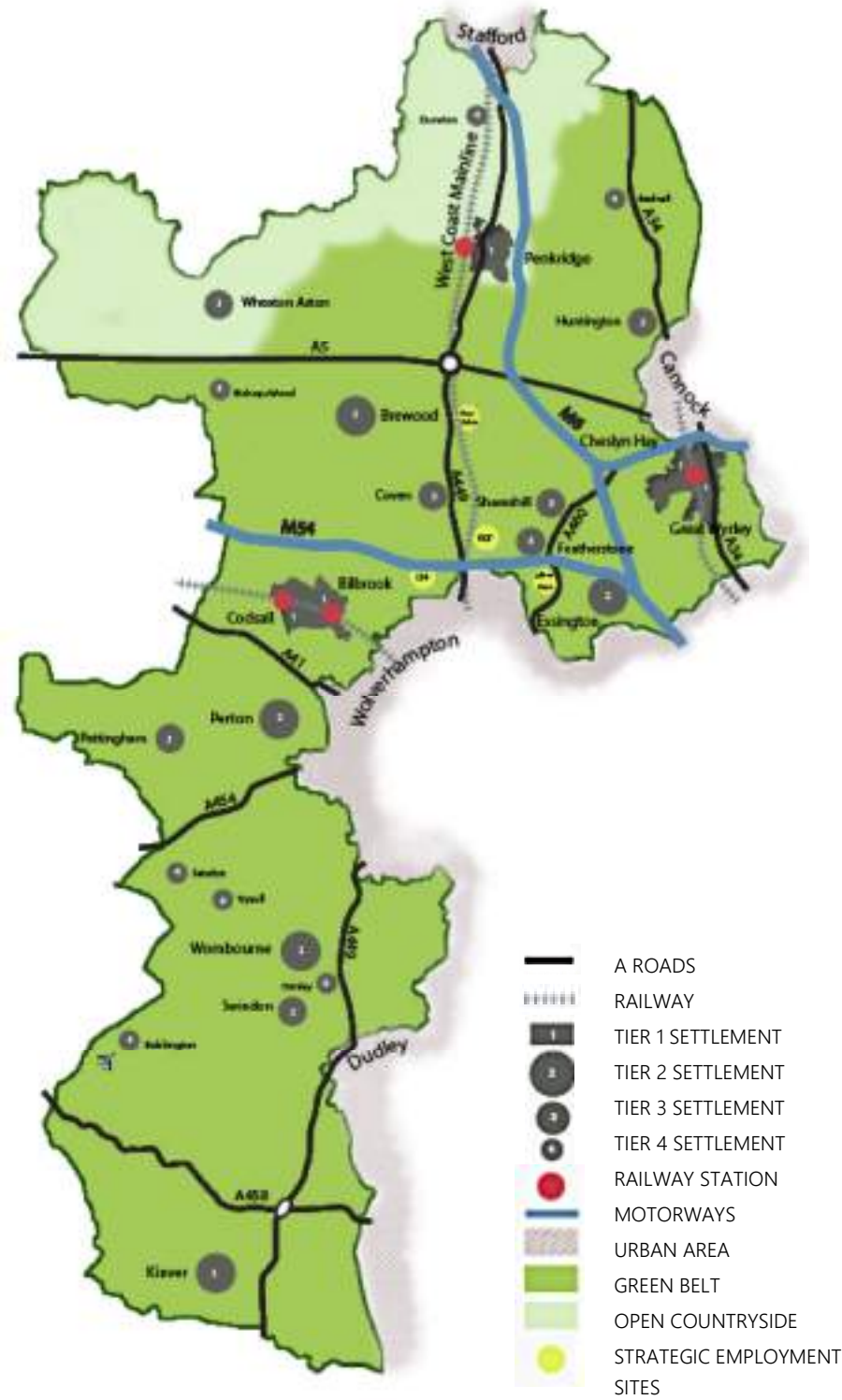
2.8 The policies map identifies the following designation for the site:

- Green Belt (Policy GB1)

2.9 Codsall does not lie within a Neighbourhood Area Designation and therefore a Neighbourhood Plan has not been progressed to date.

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 (GBBCHMA). 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.



SOUTH STAFFORDSHIRE PLAN SHOWING SETTLEMENT TIRES (FROM *ISSUES AND OPTIONS* OCTOBER 2018)

2.11 The Issues and Options consultation document identifies an objectively assessed housing need of 5,130 dwellings for South Staffordshire District to 2037, utilising the Government’s standard method. In addition, it highlights a range of growth options for contributing towards meeting the housing shortfall within the wider GBBCHMA and commits to testing the delivery of a minimum of 4,000 additional dwellings. This would provide a minimum requirement of 9,130 dwellings between 2018 and 2037; representing a significant uplift compared with past delivery rates experienced within the District.

2.12 The Issues and Options document also identifies a range of spatial distribution options to be tested, including an option to focus development to the District’s larger and better connected villages, such as Codsall. A revised Settlement Hierarchy has informed these options, which highlights Codsall as a “Tier 1” settlement.

2.13 The Tiers are set out in the new *Rural Services and Facilities Audit* (2018), which assessed the sustainability of the district’s settlements relative to one another. This has involved a high level assessment of the services and facilities in each rural settlement, as well as sustainable transport links to higher order services, such as employment, retail centres and hospitals.

2.14 Tier 1 settlements are considered the most sustainable of the District’s villages, with the greatest access to services and facilities. It is concluded that:

“These settlements typically have food stores, a wider range of facilities than other villages, a range of education establishments, access to a train station and good access to employment and wider facilities outside the village via public transport.”

2.15 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.

2.16 Codsall is completely constrained by Green Belt, with the exception of an area of Safeguarded Land to the south of the village. 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 such as Codsall. In addition, further housing growth within the village will be required in the longer term, beyond the proposed plan period and therefore further safeguarded land should be identified within Codsall to allow for future needs to be met.

CASE FOR GREEN BELT RELEASE

2.17 Paragraph 136 of the NPPF confirms 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.”

2.18 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.

2.19 The Local Plan Review Issues and Options document confirms that a joint Green Belt review covering both the Black Country and South Staffordshire is currently being prepared. This is anticipated to be published in ‘early 2019’, to inform the Preferred Options version of the Local Plan Review.

2.20 An assessment of Land at Strawmoor Lane against the purposes of the Green Belt (as defined at Paragraph 134 of the NPPF) is included below, to assist the Council with their consideration of the site:

TO ASSIST IN SAFEGUARDING THE COUNTRYSIDE FROM ENCROACHMENT

2.21 By definition, development of any greenfield site beyond the boundary of a settlement results in encroachment into the countryside. Nevertheless, as set out above, the identified site boundaries align with existing residential or agricultural buildings to the western edge of Codsall. There are therefore clear urbanising features surrounding the site, reducing the extent to which the site encroaches into the open countryside.

2.22 As set out above, the site’s western boundary is currently defined by a mixture of features. The development of the site for residential purposes represents an opportunity to strengthen this boundary to provide one which would endure in the long-term, creating a clear transitional arrangement between the urban area and the countryside.

2.23 Lastly, the site is currently in private ownership and no public rights of way exist across it. As such, the site does not offer any opportunities for recreation. The Concept Plan illustrated later within this Vision Document includes significant areas of open space, particularly to the south-east of the site, increasing opportunities for recreation and promoting access into the countryside.

TO PRESERVE THE SETTING AND SPECIAL CHARACTER OF HISTORIC TOWNS

2.24 There are no listed buildings or other heritage assets within the vicinity of the site. Similarly, Codsall as a settlement has a limited number of listed buildings, located to the centre of the settlement and around St Nicholas C of E Church. Codsall is accordingly not considered to constitute an ‘historic town’ in the context of the NPPF. As such, the development of the site for residential purposes would not compromise the setting or special character of an historic town.

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

2.25 Whilst the intention of this purpose is recognised, the Local Plan Review Issues and Options document acknowledges that there is insufficient brownfield land within South Staffordshire (and Codsall) to accommodate identified development needs. As such, the development of the site would not prejudice the redevelopment of derelict or other urban land.



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

A landscape photograph showing a large field of tall green grass in the foreground. In the middle ground, there is a row of several houses with dark roofs and light-colored walls, partially obscured by trees. The sky is blue with scattered white clouds. The image is overlaid with a semi-transparent light green rectangle on the right side, which contains the text.

03

THE SITE AND ITS SURROUNDING CONTEXT



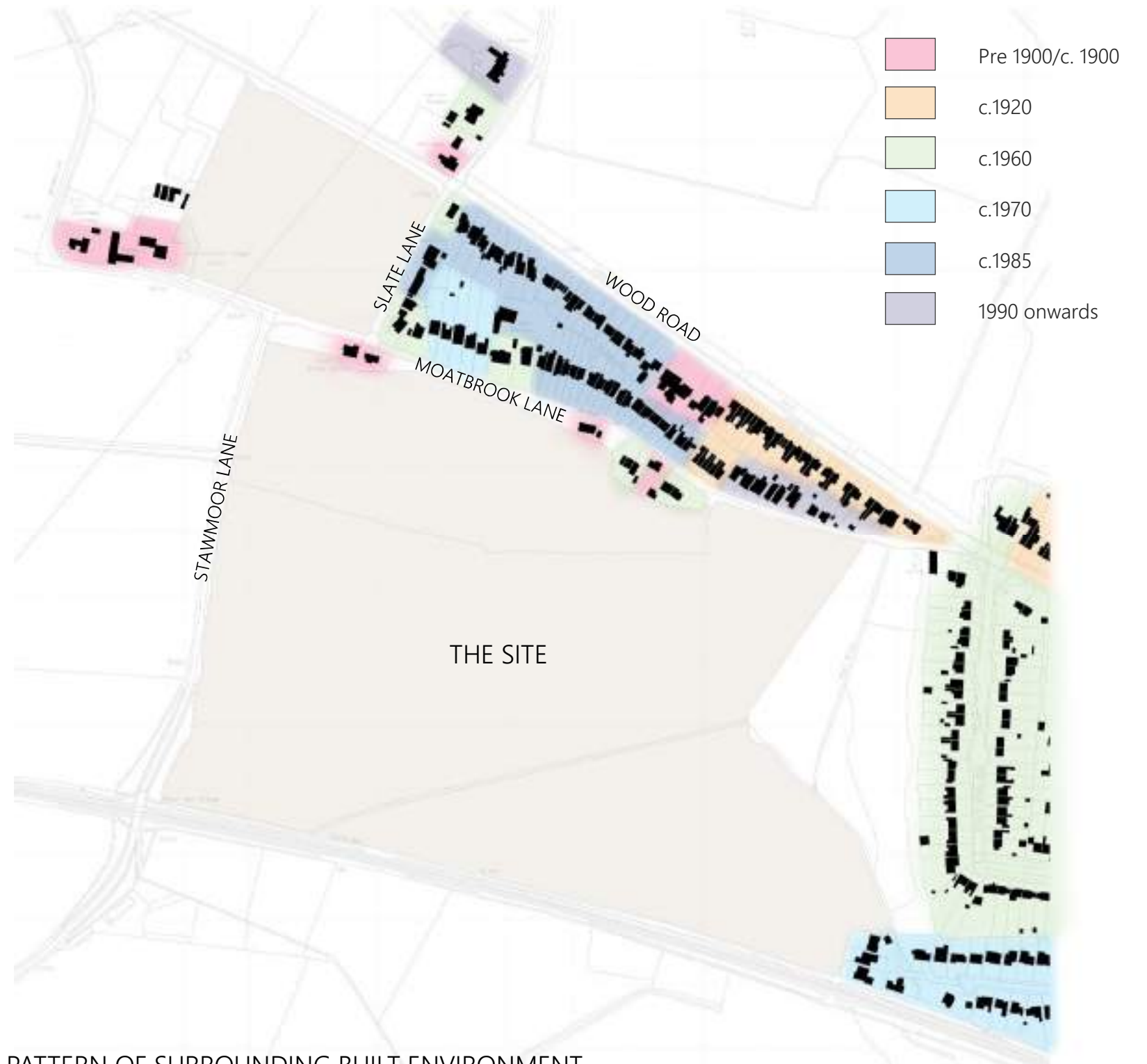
1



2



3



PATTERN OF SURROUNDING BUILT ENVIRONMENT

IMAGES

- 1 Post office, shops and café on Station Road
- 2 The Crown Joules pub, Wood Road
- 3 Shopping parade, The Square

03 THE SITE AND ITS SURROUNDING CONTEXT

THE SITE

3.1 Land at Strawmoor Lane adjoins the western edge of the urban area of the settlement, immediately north of the Birmingham to Shrewsbury railway line; to the west and south of a residential area lying between Wood Road; and Moatbrook Lane. The site extends to approximately 17.7 hectares and comprises three pieces of land managed as arable fields and pasture.

3.2 The site is generally flat with the lowest point located within the south of the site.

SURROUNDING BUILT FORM

3.3 The main development parcel is surrounded by existing dwellings to the north and to the east, while the smaller northern development parcel is bounded by existing residential development to the east, along Slate Lane.

3.4 On the south-side of Moatbrook Lane, adjoining the northern site boundary of the main parcel is a scattering of existing dwellings comprising two pairs of semi-detached houses built c. 1960, (highlighted in green on the image to the left) and several older dwellings dating back to around the turn of the century, including Moatbrook House (highlighted pink).

3.5 The parcel of existing dwellings between Moatbrook Lane and Wood Road has developed gradually over time. This gradual development has resulted in a piecemeal character. Existing dwellings fronting Moatbrook Lane (north side), comprise a mixture of one

and two-storey development, and a mixture of detached, semi-detached and terraced dwellings. Generally, the frontages are landscaped, with varying set-backs.

3.6 The existing development to the east of the main part of the site comprises 1960s and '70s residential development.

3.7 The 1960s development (shaded green) comprises semi-detached two- and single-storey dwellings with front gardens enclosed by low brick walls, hedges and shrubs. Dwellings are constructed in red facing brick with red/brown plain tiles.

3.8 The c.1970s development (shaded blue) comprises detached two-storey dwellings; materials are a mixture of red brick, pale red/buff brick and cream render, with brown pantiles. Set backs are consistent, and gardens are left open, with no boundary treatment. Parking is accommodated on plot.

3.9 The later developments are less compactly built than the existing dwellings along Moatbrook Lane.

SURROUNDING AREA

3.10 Codsall provides a good range of shops, including supermarket, and community and health care facilities. South Staffordshire Council offices are based in Codsall, and there are both middle and high schools and a leisure centre. Codsall has a frequent bus service to Wolverhampton and has good access to the M54 motorway.

3.11 Codsall is close to significant new high quality job opportunities that continue to be created at i54 and the railway station provides frequent services to Birmingham and Shrewsbury.


3.12 Codsall is well-placed geographically and through good transport links to provide an appropriate location for meeting cross boundary pressures. Direct train links to Birmingham and good links to the M54 and Wolverhampton suggest a strong functional relationship exists between Codsall and the conurbation, where current housing pressures are evidenced.

3.13 Land at Strawmoor Lane, Codsall, is in a sustainable location within close proximity to the village centre and Codsall railway station. The site is very well located to take advantage of local facilities within the centre 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.

3.14 The site provides an opportunity to deliver much needed housing, together with all necessary supporting infrastructure.

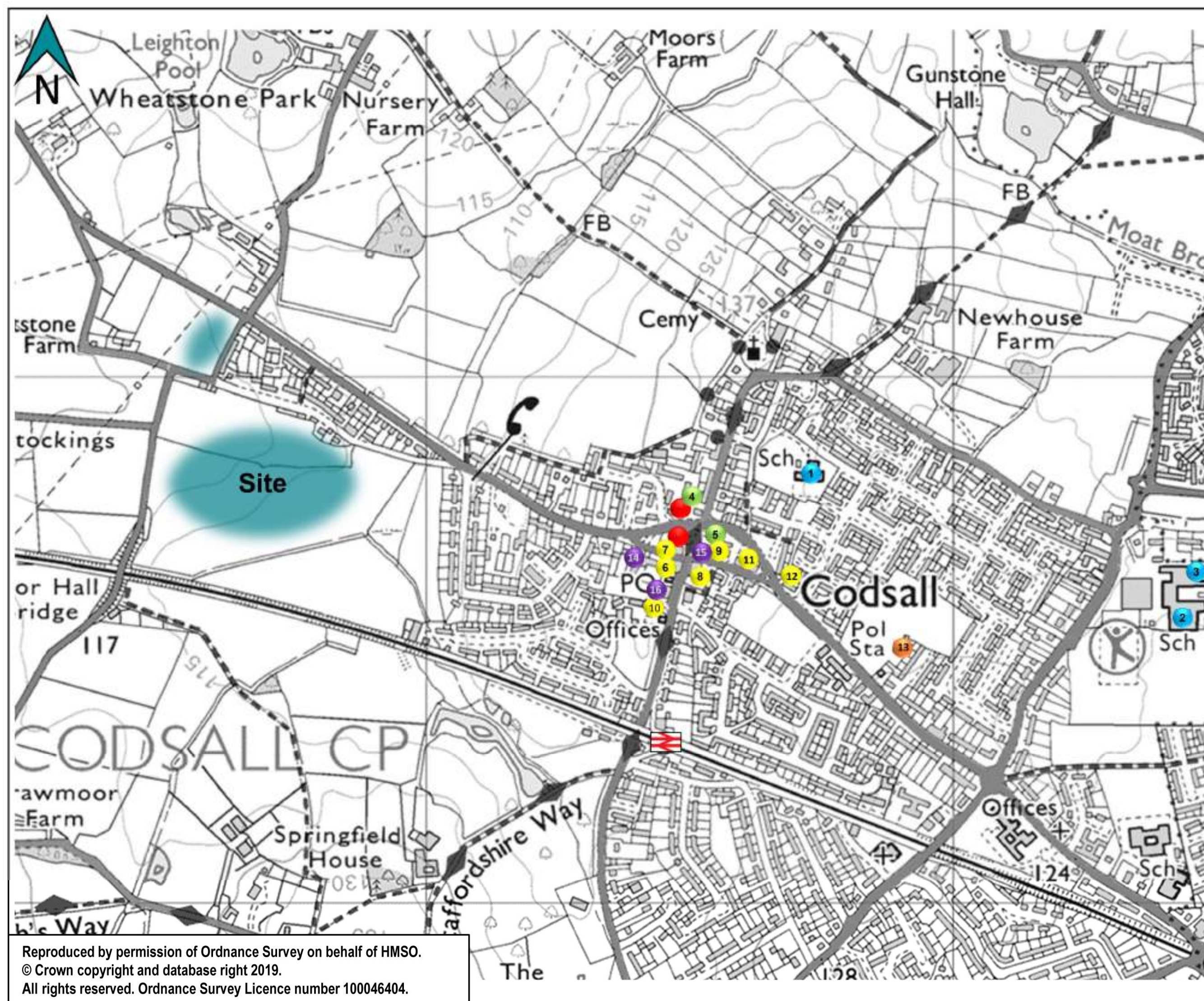
“Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscaping setting, while not preventing or discouraging appropriate innovation or change”





04

ENVIRONMENTAL
CONSIDERATIONS



- Legend**
- Site
 - Bus Stops
 - Rail Station
 - 1 St Nicholas CE (VC) First School
 - 2 Codsall Community High School
 - 3 ABC Early Learning & Childcare Centre
 - 4 Russell House Doctor's Surgery
 - 5 Llyods Pharmacy
 - 6 Zen Spa & Beauty
 - 7 The Crown Joules Public House
 - 8 The Bull Public House
 - 9 Lacey's Bistro
 - 10 Coffee Shop
 - 11 Codsall Fish Bar
 - 12 Urban Hair & Beauty
 - 13 Codsall Village Hal
 - 14 Co-operative Food
 - 15 Nationwide Building Society
 - 16 Post Office

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04 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 The plan opposite indicates the location of the local facilities within Codsall.

4.3 St Nicholas CE First School is located at about a 1.4km walk from the centre of the proposal site with a signalled crossing of Wood Lane/Baker's Way provided *en route* with the final leg of the journey along Church Road. Codsall Middle School and St Christophers Catholic Primary school can be reached further to the east at around a 1.9km walk from the centre of the site. Codsall Community High School is located off Elliotts Lane at about a 2.0km walk; the leisure centre is located alongside the school.

4.4 The post office is located in the centre of Codsall at about an 925m walk from the centre of the site. A number of local restaurants, takeaways, and public houses are located in the centre of Codsall at about an 900m-955m walk from the site.

4.5 Several foodstores are available in the village along with facilities such as pharmacies, banks, and other typical high street shops and services.

4.6 Russell House provides GP facilities off Bakers Way at an approximate 890m walk from the centre of the site and Codsall Dental Practice is located on Bakers Gardens at about a 740m walk.

4.7 Bus service number 5 provides a frequent 7-day service between Wolverhampton and Codsall via Dunstall and Bilbrook (half-hourly or better on weekdays). The service is supplemented further by service 5A that runs mon-Sat on an approximate half-hourly frequency along a slightly different route. Service 10B provides three services in each direction on weekdays between Wolverhampton, Perton and Codsall.

4.8 Codsall railway station provides regular, frequent services between Birmingham New Street and Shrewsbury via Wolverhampton via Wolverhampton and Telford Central amongst other stations.

Amenity	Distance
Co-operative Food	830m
Zen Spa and Beauty	850m
The Crown Joules Public House	860m
Russell House Doctors Surgery	890m
The Bull Public House	900m
Nationwide Building Society	900m
Lacey's Bistro	915m
Lloyds Pharmacy	925m
Post Office	925m
Coffee Shop	955m
Codsall Fish Bar	955m
Urban Hair and Beauty	1.0km
St Nicholas CE (VC) First School	1.4km
Codsall Village Hall	1.4km
Codsall Community High School	2.0km
ABC Early Learning & Childcare Centre	2.1km

ACCESS AND MOVEMENT

Local Highway Network

- 4.9 The main body of the proposal land is located on the western side of Codsall; fronting Moatbrook Lane to the north and Strawmoor Lane to the west. A railway line lies to the south of the development with housing lying beyond a treeline to the east. A smaller parcel of proposal land lies to the north of Moatbrook Lane, south of Wood Road, and west of Slate Lane.
- 4.10 The speed limit on Wood Road along the site frontage is 40mph, Slate Lane is subject to a 30mph speed limit, Strawmoor Lane and part of Moatbrook Lane are subject to the national speed limit with the majority of Moatbrook Lane that fronts the site being subject to a 30mph speed limit.
- 4.11 Strawmoor Lane is approx. 5.5m wide and has the nature of a country lane with verges present; no lighting or footways are currently provided. Strawmoor Lane turns first eastwards at Moatbrook Lane and then northwards at right angles to become Slate Lane; Slate Lane is relatively narrow in places at about 3.8m and has housing on its eastern side with frontage access to the lane; the lane is lit but no footways are present.
- 4.12 Wood Road forms part of the route from the site, through Codsall and Bilbrook, and towards the A449 Stafford Road. The route carries only modest traffic levels. Strawmoor Lane and Moatbrook Lane are lightly trafficked routes by any standard.
- 4.13 Staffordshire County Council (SCC) have been consulted through the official pre-application process to discuss the proposed access strategy and potential highway impacts of the proposed development site. Positive feedback has been received from SCC with regard to the access proposals. Furthermore, the potential scope of the Transport Assessment which would support any subsequent planning application has been agreed.

IMAGES

- 1 View south along Stawmoor Lane
- 2 View south-east along Wood Road
- 3 View south along Slate Lane
- 4 Moatbrook Lane/Strawmoor Lane junction
- 5 Slate Lane/Moatbrook Lane junction
- 6 Wood Road/Slate Lane junction





Policy Considerations

4.13 The Staffordshire LTP 2011 covers the plan period 2011-2026 and has among its stated aims:

- Enabling economic growth without causing congestion
- Providing opportunities for residents and visitors to access jobs, training and education
- Keeping the highway safe and serviceable whilst achieving value for money
- Improving on our excellent safety record
- Encouraging and providing for active travel

4.14 Policies 5.1 and 5.2 of the Plan address the promotion of alternatives to private motor vehicles and encouraging low-emitting vehicles and vehicle efficiency.

4.15 Policies 6.1 and 6.2 deal with encouraging walking and cycling for health benefit reasons and helping residents to access services (sustainably) by integrating transport and land use policies. Policy 6.4 aims at improving Staffordshire’s road safety record and Policy 6.6 deals with reducing emissions from road transport.

4.16 The content of this Vision Document for the proposed development demonstrates that the location of the land is well placed to make use of existing local facilities and sustainable transport services/infrastructure with the need for only limited mitigation works to provide connections from the site to these facilities, sustainable infrastructure, and sustainable services.

4.17 Any subsequent planning application will be supported by a Travel Plan alongside a Transport Assessment. The Travel Plan will address the policy considerations set out in the LTP and seek to promote the residential development in a sustainable manner.

4.18 The relevant national policy is set out in the National Planning Policy Framework (NPPF) which states that:

“Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”

4.19 We shall, of course, be aiming for the much higher standards that that set out in local policy by encouraging active modes of travel alongside public transport as realistic opportunities to private car use.

Proposed Access Strategy

- 4.20 At a potential site capacity of up to 230 dwellings we are proposing an access strategy that extends Strawmoor Lane northwards to serve the northern parcel of land, meeting Wood Lane at a priority junction and providing a more attractive route to Wood Lane for traffic (rather than along Slate Lane) from the development proposal and elsewhere. To help enforce this, signs indicating '*motor vehicles prohibited except for access*' are proposed to the western extent of Moatbrook Lane and on Slate Lane on its junction with Wood Road.
- 4.21 The main vehicle access to the major body of the development will be from Strawmoor Lane in the form of a priority junction, with Moatbrook Lane forming a priority crossroads junction with Strawmoor Lane and on through the northern development parcel to Wood Lane. A separate pedestrian access is provided to Moatbrook Lane in the northeast corner of the site. The access arrangements are indicated on the accompanying drawings to the left and right.
- 4.22 The site access points can accommodate a refuse lorry, which is typically the largest vehicle that might be expected to access site on a week-to-week basis.
- 4.23 The proposed development of around 230 dwellings would be expected to generate around 120 two-way peak hour vehicle trips; two vehicle movements per minute with the majority of traffic expected to head north along Strawmoor Lane. The site access strategy can easily accommodate such levels of traffic and the impact of the development traffic is such that it will be barely perceptible to existing road users on the local and wider highway network away from the site access.
- 4.24 The visibility splay requirements at the proposed site access junctions have been based on recorded traffic speeds and are in line with guidance set out in Staffordshire County Council's Residential Design Guide (Appendix A).



PROPOSED SITE ACCESS STRATEGY OVERVIEW

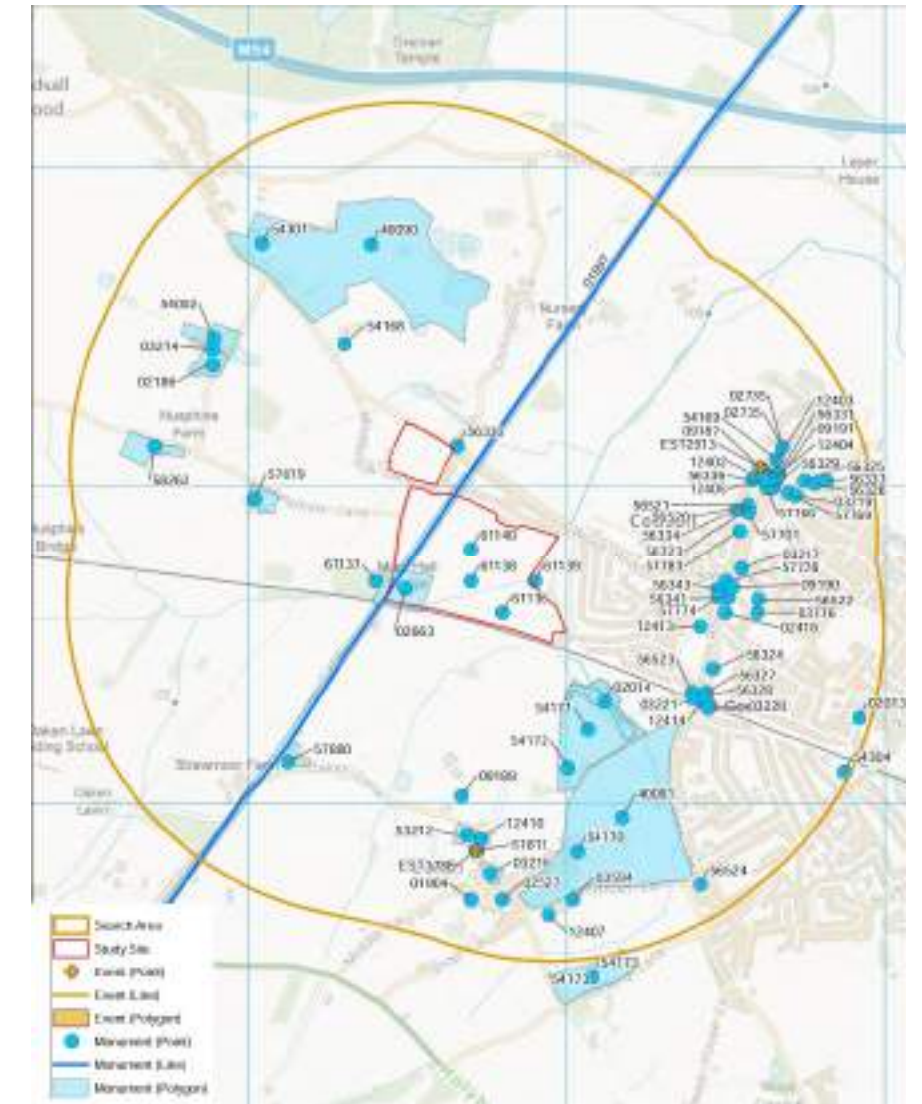
HERITAGE AND ARCHAEOLOGY

- 4.25 Archaeological Desk Based and Built Heritage Statements have been undertaken which identify and consider heritage assets within a 1 km search radius. These assessments draw together the available archaeological, historic, topographic and land-use information in order to clarify the heritage impacts and below ground archaeological potential for the site.
- 4.26 There are no designated heritage assets on the proposed development site, and the proposed development will have no impact upon the significance of any designated heritage assets outside of the study site.
- 4.27 The site forms a neutral element of the wider settings of two of the identified built heritage assets: the Church of St Nicholas (Grade II*) and the Codsall & Oaken Conservation Area (designated 1973). However, the proposed development of the site could be sensitively designed to protect their respective significance. Therefore the proposed development of the site would cause no harm to the significance of any built heritage assets.



VIEW EAST FROM STRAWMOOR LANE ACROSS SITE

- 4.28 The study site contains no evidence for remains of Prehistoric date, and only very limited evidence has been recovered from within the 1km search area pertaining to Prehistoric activity.
- 4.29 There are two records of Medieval activity within the study site: the remains of Moor Hall and Moat (see 1831 plan) and a Medieval padlock. In addition, the LiDAR imagery indicates that the site formerly contained ridge and furrow which may be of Medieval date. No remains of Saxon/Early Medieval date area recorded within the study site on the HER.
- 4.30 Except for the southwest corner of the study site, the site is considered to have a negligible potential for significant remains of Saxon/Early Medieval or Medieval date. The southwestern corner of the study site however is considered to have a high potential for remains of Medieval date relating to the former Moor Hall and Moat. It should be noted that the current Illustrative Masterplan for the proposed development envisages limited development within the area of Moor Hall and Moat.



MONUMENT AND EVENT DATA



PLAN OF THE TOWNSHIP OF CODSALL, 1831

LANDSCAPE AND VISUAL



Policy Context

- 4.31 The site is not subject to any national landscape designations. The site lies within the Green Belt.
- 4.32 The site is located within the South Staffordshire district, located to the north western edge of Wolverhampton and to the west of Codsall residential suburb. Applicable local policy objectives address the need to enhance the landscape of the Green Belt and the green infrastructure of the District.
- 4.33 There are no public footpaths running through or adjacent to the four fields; however, a network of Public Rights of Way are present across the wider landscape.

IMAGES

- 1 View facing south from Moatbrook Lane
- 2 View facing west from junction located at Wood Road and Slate Lane
- 3 View facing south west from Moatbrook Lane
- 4 View facing east from Strawmoor Lane



Landscape Character

4.34 At a regional level, within the Staffordshire County Council Planning for Landscape Change SPD (2000), the site is identified as being located within the 'Ancient Clay Farmlands'.

4.35 The key characteristics of the Ancient Clay Farmlands include:

- *A gently rolling landform with localized meres and mosses*
- *An irregular field pattern defined by ancient hedgerows*
- *Narrow winding, often sunken lanes*
- *Hedgerow damsons and occasional native black poplars*
- *Marl pits and field ponds*
- *Dispersed settlement pattern of farmsteads and wayside dwellings*
- *Traditional red brick and clay tile buildings*

4.36 Detracting features in the area identified by the SPD include the following:

- *Busy main roads and motorway*
- *Powerlines*
- *Large modern farm buildings*
- *Industrial developments*
- *Electrified railway line*
- *Urban edge*
- *Improved and new commuter dwellings*
- *Introduction of wire fencing for tock control associated with deteriorating field pattern*



Site-Specific Context

4.37 PARCEL A: Bounded by dense hedgerow planting; the eastern boundary influenced by the existing residential edge of Codsall. Three of the four boundaries are surrounded by roads with access from Moatbrook Lane along its southern boundary. This parcel comprises a singular grassland field which slopes gently to the east with no internal landscape features.

4.38 The larger southern parcel comprises 3 irregular-shaped fields (B, C and D). The northern boundary is influenced by existing properties off Moatbrook Lane, although intervening hedgerows separate the site from the residential edge. Mature hedgerows and trees strongly distinguish the individual parcels, with a scattering of mature trees providing the only internal landscape features.

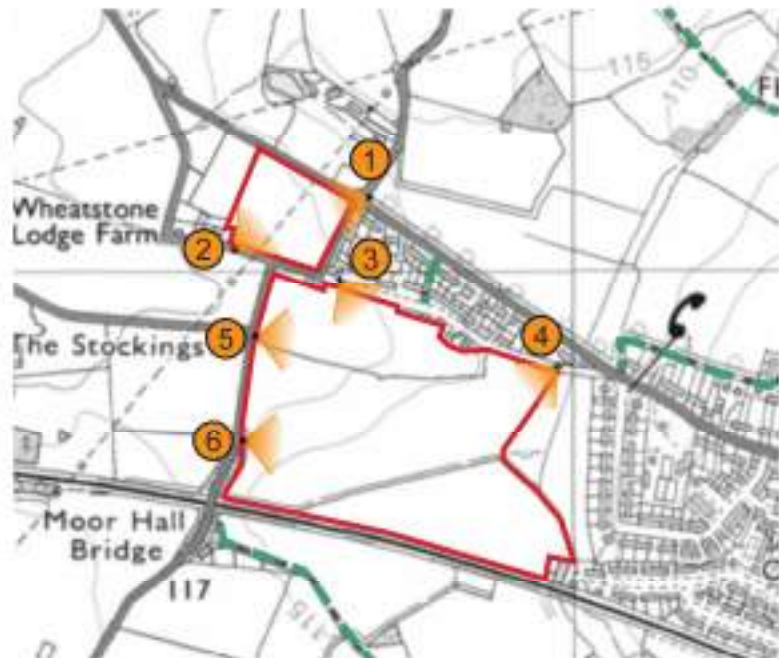
4.39 To the south of the site lies the railway line and associated vegetation. Strawmoor Lane bounds the western edge to parcel B and C with small fields surrounded by dense vegetation to the east of parcel C and D.

4.40 The hedgerow field boundaries along with hedgerow tree planting provide containment and structure and are also characteristic features within the local landscape. They will be retained and enhanced wherever possible to strengthen the contained nature of the site and filter the new development and existing built edge.

4.41 Development fronting Moatbrook Lane and Wood Road will respect the character of existing properties that are set back from the road frontage, retaining good quality tree stock.

4.42 Field parcels B, C and D are irregular-shaped and expansive with a small number of internal hedgerows to separate them. Scattered field trees are located within parcels B and C.

4.43 Parcel C and D are divided by a ditch with associated vegetation. The Flood Zone covers a large part of Parcel C and D as shown on the Landscape Opportunities and Constraints Plan.



Views

- 4.44 Both parcels relate visually to the existing settlement edge. The northern parcel lies adjacent to properties on either side of the road junction (see view 1), with dense hedgerow filtering views into the site. Slate Lane to the left of the viewpoint is a single track road that runs adjacent to the boundary vegetation of the northern parcel.
- 4.45 Viewpoint 2 shows a view from Moatbrook Lane facing east with filtered views across the site. There are no internal hedgerows or trees, with topography sloping gently to the east. The northern parcel is further influenced by built form in the way of Wheatstone Lodge Farm, accessed via the gate shown in the view.
- 4.46 Viewpoint 3 shows the view from Moatbrook Lane facing south-east towards the southern parcel. The site land is slightly raised adjacent to the roadside, although bound by mature hedgerow and trees restricting views into the site itself.



4.47 Viewpoint 4 is from the north-eastern corner of the main parcel looking south-west across the site. The residential influence is highlighted by the properties along Moatbrook Lane. All field parcels are bound by mature hedgerows and vegetation, although the site itself is expansive with no internal trees. The hedgerow along the eastern section of Moatbrook Lane is gappy and allows for clear views into the site.



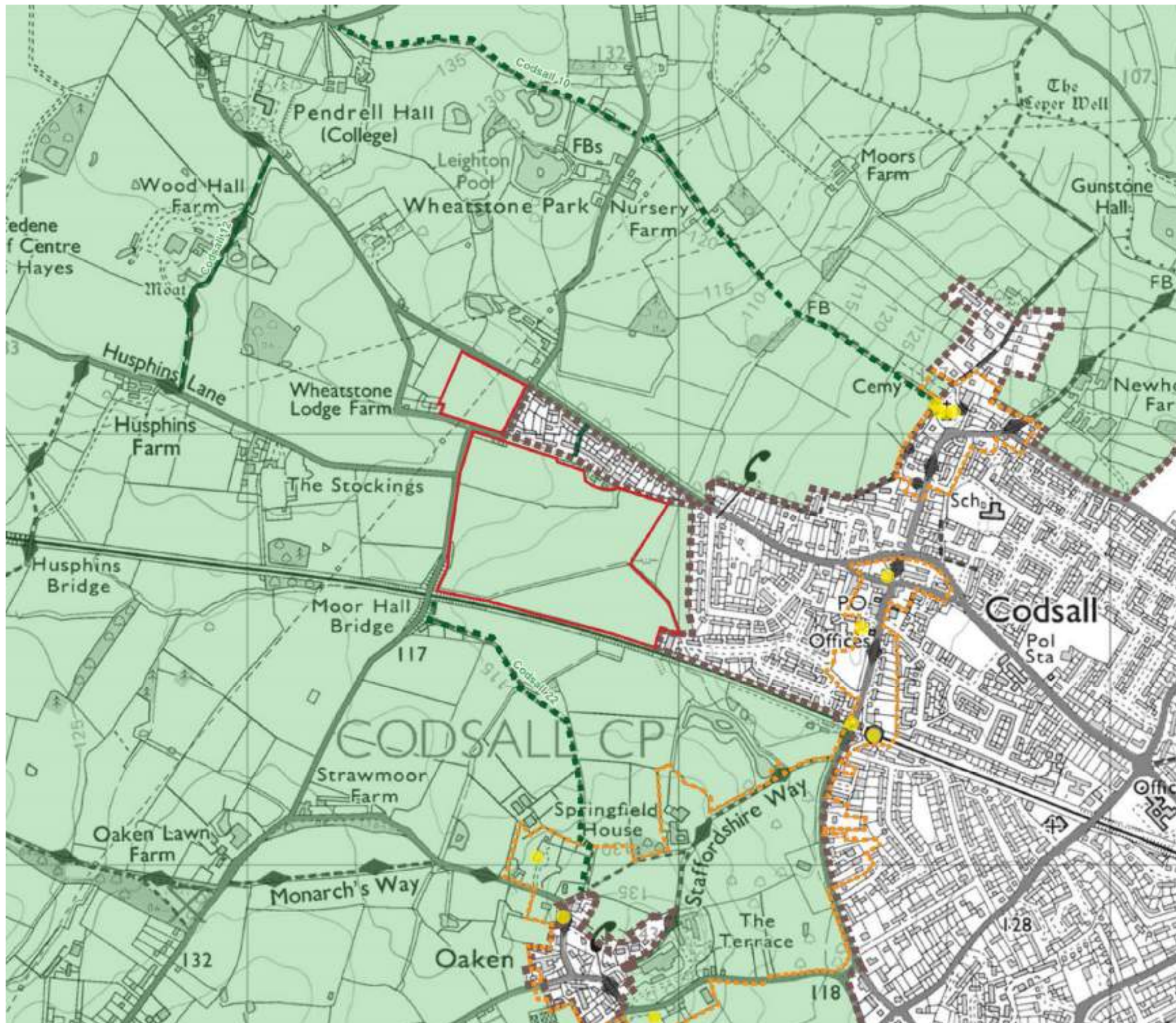
4.48 Viewpoint 5 is from the western boundary of the main parcel; existing properties along Moatbrook Lane visibly providing a developed backdrop. The internal hedgerows are well-maintained and provide a strong distinction between parcels. The topography of the southern, larger parcel slopes gently towards the brook which dissects the site from east to west.



4.49 Viewpoint 6 is from the western boundary of the main, open field parcel, the southern extent of the site. Expensive views are possible with boundary vegetation providing a backdrop between existing properties to the east. The railway line lies to the right hand side of this view point, bound further by mature vegetation which restricts the possibility of any distant views towards the site.

IN SUMMARY

Overall, the site relates well to the existing residential edge of Codsall, with the proposed development providing no uncharacteristic or incongruous features. Views are limited and localized and all feature urban influences, with the railway line and associated vegetation to the south further restricting distant views.



- Site Boundary
- South Staffordshire Local Plan (2012):*
- Development Boundary
- Green Belt: Policy GB1
- Conservation Areas: Policy EQ3
- Public Rights of Way:*
- Footpaths
- Bridleways
- Other Designations:*
- Listed Buildings

LANDSCAPE PLANNING ANALYSIS AND PUBLIC RIGHTS OF WAY

4.50 The site is largely contained by development along Moatbrook Lane and Wood Road to the north, and the edge of Codsall to the east, placing the site within the built extents of the settlement. The parcel of land within the site to the west of Slate Lane is similarly well contained by roads that form robust boundaries. Development would not extend beyond the existing development of Moatbrook Lane and would be contained by the existing roads. Considering the above, any sprawl would be well contained within the existing fields, built edge and infrastructure network.

4.51 Trees along Woods Road and hedgerows and trees to fields bounding the site provide further physical and visual containment. To the south, the site is contained by the railway line and lies adjacent to the extents of existing residential on the edge of Codsall to the east, therefore the site does not prevent coalescence of Codsall Wood to the north and Oaken to the south. There are opportunities for the strengthening of the boundary along the railway line with additional tree belt/woodland planting.

4.52 The land between Moatbrook Lane and the railway line comprises agricultural fields including hedgerows and trees to field boundaries. To the east, tree belts and woodland provide separation with the adjacent built edge. Away from the influence of properties on Moatbrook Lane, the southern site area has a more rural character and sense of being in the countryside, although the railway line, passing trains and influence of the adjacent settlement place the site within an urban fringe/peri urban context. Whilst there are hedgerows and trees dividing the southern site area, these are degraded and gappy in places, with field trees indicating former field boundaries and railway line being open along much of its length. There are therefore opportunities for reinstating and enhancing field boundaries and providing new hedgerow, tree and woodland planting in this area to strengthen the landscape character and the physical and visual boundaries to the site at the interface with the wider landscape and Green Belt to the south. The development site therefore makes a limited contribution to Green Belt purposes.

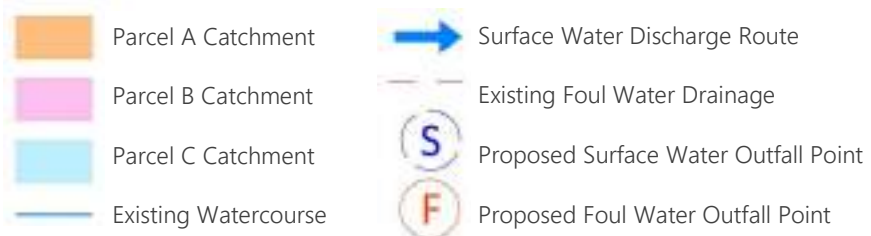


LANDSCAPE OPPORTUNITIES AND CONSTRAINTS

FLOOD RISK AND DRAINAGE



DRAINAGE STRATEGY PLAN



- 4.53 The site is shown to be predominantly in Flood Zone 1, which is land considered to have a low probability of fluvial/tidal flooding. There are some lower areas of the site which are in Flood Zones 2 & 3 these are not proposed for development.
- 4.54 One ordinary water course is present, entering from the west and flowing eastwards, becoming a Main River on the eastern boundary.
- 4.55 No record of historic flooding on the site exists, however, anecdotal evidence suggests that the lowest parts of the site (i.e., those adjacent to the watercourse) are seasonally wet, which is to be expected. A sequential approach to the development layout is sufficient to reduce the risks relating to the watercourse.
- 4.56 The area is not considered to be at notable risk from groundwater-flooding and there are no small or large waterbodies that pose a risk to the site should they fail.
- 4.57 Tidal and canal sources are not considered to pose a risk due to the distance and terrain between the site and such features.
- 4.58 The topography of the site supports the use of gravity storm drainage, with a general fall towards existing watercourses.
- 4.59 It is anticipated that some foul drainage will require pumping. A pumping station will therefore be required on the site at a location which is to be determined based on the final layout requirements.
- 4.60 An initial surface water drainage strategy has been produced for the site and is incorporated within the indicative masterplan. It is proposed that on site attenuation is provided up to the 1 in 100 year plus climate change event, using sustainable drainage systems with a networks of swales and ponds providing suitable flow conveyance, attenuation and a controlled outfall at greenfield runoff rates.
- 4.61 The drainage strategy has been developed with an aim of making parcels self-sufficient wherever possible to remove a reliance on large, site-wide infrastructure and to promote the interception of exceedance flows, working with the natural topography to locate attenuation features in the low points of each parcel.
- 4.62 The development parcels and associated sustainable drainage infrastructure have been located so as to avoid encroachment into the flood zones as presently shown on EA mapping. Pre-application advice has been sought from the Lead Local Flood Authority who are accepting of these principles and the general strategy. There may be opportunity to provide further betterment along Moatbrook Lane by capturing and diverting overland flows into the on site drainage, subject to further technical studies.

ECOLOGY

4.63 An initial preliminary ecological appraisal and desk-based study was undertaken in August 2018, by RammSanderson. The purpose of the preliminary ecological appraisal was:

- To classify the habitat types on the proposed site
- To evaluate any potential for protected species to be present
- To identify any significant ecological impacts likely to result from the proposed development
- To provide recommendations for further surveys that might be required

Habitats

4.64 The site was dominated by arable fields and improved grassland bounded by hedgerow, drains and scattered trees, with field margins of scrub and poor semi improved grassland. No ponds were identified on the site, however there were eleven ponds identified within 500m of the site. Several of these were beyond major dispersal barriers. Three ponds were identified that may provide suitability for great crested newt (GCN).

4.65 The majority of habitats onsite are considered to be of low inherent ecological value. However, the dense continuous scrub hedgerows and trees are of ecological and intrinsic value at the site level. These habitats where possible shall be retained. Any of these habitats that will be lost shall be mitigated through landscape replanting.

Protected/Priority Species

4.66 The site offers potential for protected species, notably: bats, breeding birds, GCN, otter, water vole and white clawed crayfish dedicated surveys for these species will be undertaken to identify their presence and inform the scale of any required mitigation. Badger, reptiles and local biodiversity action plan (LBAP) species such as brown hare shall be mitigated for on site accordingly with sensitive vegetation management and precautionary methods of works during construction.

Designated Sites

4.67 No statutorily designated sites were recorded within 2km of the site and the closest site was over 4km away (Donington and Albrington Local Nature Reserve) from the site boundary.

4.68 The closest non-statutory designated site was a Biodiversity Alert Site (BAS). The site has been retained due to the type of habitat (wet pasture) and plant diversity within the drain running through the BAS. Due to proximity of this site considerations will be taken into account, to ensure the site is not disturbed during and post construction. Reduction in footfall to this site shall be undertaken through solutions designed to reduce pedestrian access to the BAS.

Opportunities for Enhancement

4.69 The recently revised NPPF 2018 requires sites to deliver biodiversity net gains and benefits. Therefore, additional enhancements shall be provided within the development plan to achieve this objective. Where new landscape

planting is proposed species commonly occurring locally shall be used. Where losses of hedgerows, or individual tree removals cannot be avoided planting will be of a "like for like or better" basis.

4.70 Areas of the site to the south are proposed for Green Infrastructure provision, which provides a corridor through the site, linking the existing Moat Brook BAS, to the woodland and farmland to the west. The current drain that flows into Moat Brook will be retained and provides suitable commuting and foraging for several different species. The features shall be retained and enhanced with additional native planting to buffer the ditch from the proposed development.

4.71 Other additional enhancements that can be provided include the incorporation of bat boxes and bird nest boxes. Implementation of hedgehog(/mammal) friendly fencing and gaps in gravel boards will also be implemented to prevent isolation and fragmentation for these species.



ECOLOGICAL OPPORTUNITIES AND CONSTRAINTS PLAN



- KEY**
- - - SITE BOUNDARY
 - EXISTING TREES AND HEDGES
 - ➔ POTENTIAL ACCESS LOCATIONS
 - - - OPPORTUNITIES FOR HIGHWAY IMPROVEMENTS
 - ⋯ EXISTING PUBLIC RIGHTS OF WAY
 - ➔ OPPORTUNITIES FOR FOOTPATH CONNECTIONS
 - ➔ RESIDENTIAL AMENITY CONSIDERATIONS
 - FLOOD ZONE
 - ELECTICITY CABLES AND CLEARANCE ZONE
 - ⋯ INDICATIVE TOPOGRAPHY
 - POTENTIAL LAND TO BE ENHANCED AND RETAINED AS GREENBELT
 - POTENTIAL FOR ARCHAEOLOGICAL REMAINS OF MOORHALL AND MOAT

SUMMARY OF ANALYSIS

4.72 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 and services, in particular to local bus and train services
- The site access strategy can easily accommodate levels of traffic envisaged to be associated with the proposed development; it is considered that the impact of such development traffic will be barely perceptible to existing road users on the wider highway network
- There are no designated heritage assets on the proposed development site, and the proposed development will have no impact upon the significance of any designated heritage assets outside the study area
- The site relates well to the existing residential edge of Codsall, with the proposed development providing no uncharacteristic or incongruous features
- Views are limited and localised and all feature urban influences, with the railway line and associated vegetation to the south further restricting distant views
- The development site makes a limited contribution to Green Belt purposes
- The majority of habitats on site are considered to be of low inherent ecological value
- Dense continuous scrub hedgerows and trees are of ecological and intrinsic value; these habitats will be retained wherever possible

4.73 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
- Existing electricity cables and associated no-build easements
- 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
- The potential for development to extend north-westwards along Wood Road to cause the perceived visual coalescence and merging with adjacent properties

OPPORTUNITIES

- To provide access into the site from existing road network (Strawmoor Lane)
- To create an attractive new walkable neighbourhood
- To create a high quality, distinctive and landscape led development supported by public open space, children's play, sports and community allotments
- 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
- Improvements to Strawmoor Lane/Moatbrook Lane junction and provision of new link road between Moatbrook Lane and Wood Road
- Provision of new footpath network through public open space and connectivity to existing Public Rights of Way

A scenic landscape photograph. In the foreground, a large, leafy tree with thick branches frames the top and right sides of the image. Below the tree, there is a dense thicket of green bushes and shrubs. In the middle ground, a vibrant green field stretches across the scene. In the background, a dirt road or path leads into a line of trees under a bright sky. The overall atmosphere is peaceful and natural.

“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”



05

VISION FOR LAND AT
STRAWMOOR LANE



KEY

- ① Continuous north-south linear green space corridor
- ② Continuous east-west linear green space corridor accommodating retained field boundary landscaping
- ③ Proposed central open space feature straddling east-west linear green space
- ④ Proposed pedestrian footpath connections
- ⑤ Proposed road framework linked for vehicle permeability
- ⑥ No vehicular access along Slate Lane (existing roadside hedgerow to be retained and enhanced where necessary)
- ⑦ Existing landscaping to be retained and enhanced where necessary
- ⑧ Proposed surface water attenuation (to incorporate permanent water features and opportunities for ecological and biodiversity enhancements)
- ⑨ Continuation of building frontage
- ⑩ Proposed 'Multi Use Games Area' (MUGA)
- ⑪ Proposed 'Local Equipped Area for Play' (LEAP)
- ⑫ Proposed Allotments (approx. 0.5 ha)
- ⑬ Proposed parking for Allotments and MUGA

- Existing Public Rights of Way
- Existing electrical cables and clearance zone
- Existing Watercourse

PROPOSED HIGHWAY WORKS

- A Strawmoor Lane/Moot Brook Lane junction improvements
- B New road link (as northwards 'extension' of Strawmoor Lane) between Moot Brook Lane and Wood Road
- C Proposed footway link onto Moot Brook Lane
- D New continuous footpath within site along Strawmoor Lane frontage

PROPOSED MOVEMENT HIERARCHY

- ➡ Proposed site entrances
- ➡ Proposed Emergency access off Strawmoor Lane
- 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

POTENTIAL PUBLIC RIGHTS OF WAY FOR ACCESS TO NEW DEVELOPMENT FROM SLATE LANE TO BE DETERMINED BY LOCAL AUTHORITIES

100 TREES CONTRIBUTION TO ADDRESS RAINFALL SUBSEQUENT TO THE CLIMATE OF LEVELS

EXISTING OF PUBLIC RIGHTS

EXISTING OF PUBLIC RIGHTS

EXISTING OF PUBLIC RIGHTS

122.0m

123.1m

122.2m

118.8m

123.1m

117.0m

115.2m

117.2m

118.1m

118.1m

118.1m

118.1m

118.1m

118.1m

118.1m

05 VISION, CONCEPT PLAN AND DESIGN PRINCIPLES

VISION FOR STRAWMOOR LANE

- To produce a new living environment of the highest standard, with a clear recognisable identity which is complementary to the vernacular and character of Codsall
- 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 of Codsall alike
- 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 Codsall as a place to live, incorporating aspects of local character, landscape, heritage, visual amenity and biodiversity

MAIN DESIGN PRINCIPLES

- Continuous north-south linear green corridor
- Continuous east-west linear green space corridor accommodating retained mature field boundary landscaping
- Proposed central open space feature straddling east-west linear green space
- Proposed pedestrian footpath connections
- Proposed road framework linked for vehicle permeability
- No vehicular access along Slate Lane (existing roadside hedgerow to be retained and enhanced where necessary)
- Highway improvements to Strawmoor Lane/Moatbrook Lane junction
- Proposed footway link from site onto Moatbrook Lane
- New continuous footpath within site along Strawmoor Lane frontage
- Existing landscape to be retained and enhanced where necessary
- Proposed surface water attenuation (to incorporate permanent wet features and opportunities for ecological and biodiversity enhancements)
- Continuation of building frontage along Moatbrook Lane
- Proposed areas for play, including 'Multi Use Games Area' and 'Local Equipped Area for Play'
- Proposed allotments and associated parking facilities

SUMMARY OF PROPOSALS:

- Number of dwellings provided = Approx. 230
- Net Developable Area = 6.980 Ha (17.25 Acres)
- Approximate residential density = 33/34 dph
- Total Open Space Area = 10.740 Ha (26.540 Acres)

PROPOSED COMMUNITY FACILITIES:

- Allotments (approx. 0.5 Ha)
- Multi-use Games Area (MUGA)
- Local Equipped Area for Play (LEAP)
- Proposed parking for Allotments and MUGA

PROPOSED HIGHWAY IMPROVEMENTS:

- Strawmoor Lane/Moatbrook Lane junction improvements
- New road link (as northwards 'extension' of Strawmoor Lane) between Moatbrook Lane and Wood Road)
- Proposed footway link onto Moatbrook Lane
- New continuous footpath within site along Strawmoor Lane frontage



INITIAL PROPOSALS



REFINED PROPOSALS

KEY

- | | | | |
|--|-------------------------------------|--|--|
| | EXISTING ROADS | | PROPOSED VEHICULAR ACCESSES |
| | INDICATIVE PROPOSED PRIMARY ROADS | | PROPOSALS FOR PRIVATE DRIVEWAY ACCESSES ONTO EXISTING ROAD NETWORK |
| | INDICATIVE PROPOSED SECONDARY ROADS | | PROPOSED EMERGENCY ACCESS |
| | INDICATIVE PROPOSED PRIVATE DRIVES | | POTENTIAL FOR 'VEHICLES PROHIBITED EXCEPT FOR ACCESS' SIGNS |
| | PROPOSED ALLOTMENT PARKING AREA | | |

DESIGN EVOLUTION

- 5.1 Initial scheme proposals comprised two main vehicular accesses, as well as a number of private driveways, onto Strawmoor Lane. In addition, while the proposed northern extension of Strawmoor Lane (connecting to Wood Road) was included at an early stage, these initial proposals included a number of individual private driveway accesses onto Slate Lane.
- 5.2 Proposals were further developed and refined to take on board feedback from Staffordshire County Council (SCC) following pre-application advice.
- 5.3 The concept layout was subsequently amended and improved as follows:

- Vehicular access to the northern parcel taken from new Strawmoor Lane road extension link road
- No direct private driveway accesses onto Slate Lane
- No private driveway accesses onto Strawmoor Lane
- One single vehicular access from Moatbrook Lane to main development parcel
- Vehicular loop arrangement link road to southern land parcel (within main parcel)
- Potential location for proposed allotment parking area indicated
- Southern vehicular access from Strawmoor Lane moved northward to utilise existing gap in hedgerow; access to be for emergency vehicles only
- Potential for 'vehicles prohibited except for access' signs included at the Moatbrook Lane/Strawmoor Lane junction, as well as on Slate Lane at its junction with Wood Road, to limit traffic impact on local highway network

DESIGN ASPIRATIONS

- 5.4 South Staffordshire Council's Supplementary Planning Document (SPD) *Village Design Guide* (adopted 15 September 2009) states that large scale developments have the potential to enhance or regenerate the character of a settlement significantly, perhaps involving the creation of new neighbourhoods or places, which should complement and strengthen the character of an existing village.
- 5.5 In line with 'Key Development Design Principles' set out in the SPD, it is envisaged that the scheme will be designed to create a new character area; one which is 'highly permeable and closely integrated both with the established village fabric and its enclosing countryside.'

- 5.6 The building materials typically and frequently seen in the village, and as identified in *Village Design Guide* are as follows:

Tiles: Red clay
Bricks: red
Facing: Render, some painted
Doors & windows: Timber

- 5.7 It is envisaged that proposed dwellings will be designed to complement this already-established materials palette.
- 5.8 New dwellings, whilst being 'contemporary', will be designed to form part of the evolving built tradition in respect of their form, siting, materials and features.





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

A high-speed train is shown from a high-angle perspective, traveling away from the viewer on a track that curves through a lush, green, hilly landscape. The sky is filled with white and grey clouds. The train is yellow and white, and its tracks are dark with gravel ballast. The overall scene is bright and natural.

06

SUMMARY AND CONCLUSION



06 SUMMARY AND CONCLUSION

SUMMARY AND 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 230 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 Codsall and within proximity to a wide range of local facilities and services, with Codsall neighbourhood centre located only approximately 0.5 miles from the site;
- Accommodate a high quality residential development that nestles within the surrounding landscape and green space network;
- Deliver an overall development vision for the site that provides a well-designed and sympathetic development in a sustainable location in Codsall;

- 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

6.4 The site can support South Staffordshire District Council in planning for its future development needs and achieving long term sustainable development. The site is appropriate for Green Belt release and allocation for housing development because it is well contained, has physical and defensible boundaries, and will not impact on the core purposes of the Green Belt. The site forms a logical extension to the residential area of Codsall.



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Town & Country Planning Act 1990 (as amended)
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