

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

**LAND WEST OF WROTTESLEY PARK ROAD, PERTON**

**REPRESENTATION PREPARED ON BEHALF OF**

**RICHBOROUGH ESTATES**

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## Document Management.

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# 1. Introduction

- 1.1. This representation responds to the South Staffordshire District Council's ('SSDC') Local Plan Review 'Publication Plan' ('the Plan') consultation held under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Representations are made with regard to the Plan itself and to the accompanying published evidence, having regard to the National Planning Policy Framework ('NPPF').
- 1.2. This representation is made by Pegasus Group on behalf of Richborough Estates who have a specific land interest in Land West of Wrottesley Park Road, Perton, 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 3 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 Wrottesley Park Road 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 SSSDC 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 West of Wrottesley Park Road (assessed under site reference 407 in the Housing Site Selection Paper) would make a positive contribution to South Staffordshire's housing allocations and could deliver circa 250 dwellings. The site is also sustainably located adjoining the Tier 2 settlement of Perton to the east and the proposed housing allocation 239 along its southern boundary.
- 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 Wrottesley Park Road would represent a logical extension to the proposed development site 239 and would therefore positively contribute to any proposed safeguarded sites.
- 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 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 District's most sustainable locations to facilitate growth and assist in meeting the wider unmet housing needs. Draft Policy SA5 allocates Land west of Wrottesley Park Road (south) (site Ref: 239) for housing with a minimum capacity of 250 new dwellings as set out by the site proforma in appendix C of the Publication Plan. This housing allocation adjoins the site being promoted by Richborough Estates and it is therefore considered the location in terms of sustainability ought to be accepted. In addition, the promotion site west of Wrottesley Road could also deliver additional benefits in the form of a country park which would have significant benefits for the wider area. This weighs in favour of its allocation.
- 5.3. It is considered that Land West of Wrottesley Park Road is a highly sustainable site, capable of supporting housing growth to meet the housing need.
- 5.4. The Site at Land west of Wrottesley Park road as discussed further in Chapter 8 of this Representation would make a valuable and logical allocation in the Local Plan not only due its location within a Tier 2 settlement where development is to be encouraged but also due to its proximity of housing allocation 239. Allocation of the site would also have additional benefits such as contribute towards the improvements to the A41. To this end, Richborough Estates strongly encourages the Council to allocate the Land West of Wrottesley Park Road.
- 5.5. Richborough Estates support the overall strategy of the Plan, however, there is concern over the lack of safeguarded land as outlined 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. This would enable the country park to come forward as a form of Green Belt compensation.

## 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 consultation<sup>1</sup> 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,

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<sup>1</sup> [www.gov.uk](http://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- Employment and Skills**

#### **EC11**

- 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 is not practical to be delivered in the form proposed, and is therefore considered unsound, on the grounds of being neither justified nor consistent with national policy for the reasons set out above.
- 6.70. 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 Consulting<sup>2</sup>. 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

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<sup>2</sup> Sustainability Appraisal of the South Staffordshire Local Plan Review – Regulation 19 SA Report Volume 1 to 3, October 2022



community.

- **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)
Major Negative --	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> <li>• Permanently degrade, diminish, or destroy the integrity of a quality receptor, such as a feature of international, national, or regional importance;</li> <li>• Cause a very high-quality receptor to be permanently diminished;</li> </ul>

	<ul style="list-style-type: none"> <li>• Be unable to be entirely mitigated;</li> <li>• Be discordant with the existing setting; and/or</li> <li>• Contribute to a cumulative significant effect.</li> </ul>
Minor Negative -	<p>The size, nature and location of development proposals would be likely to:</p> <ul style="list-style-type: none"> <li>• Not quite fit into the existing location or with existing receptor qualities; and/or</li> <li>• Affect undesignated yet recognised local receptors.</li> </ul>
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"> <li>• Improve undesignated yet recognised receptor qualities at the local scale;</li> <li>• Fit into, or with, the existing location and existing receptor qualities; and/or</li> <li>• Enable the restoration of valued characteristic features.</li> </ul>
Major Positive ++	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> <li>• Enhance and redefine the location in a positive manner, making a contribution at a national or international scale;</li> <li>• Restore valued receptors which were degraded through previous uses; and/or</li> <li>• Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national, or regional designation.</li> </ul>

**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 West of Wrotesley Park Road (North) – Site Ref: 407

7.5. Land West of Wrotesley Park Road (North) is assessed within the SA under site reference: 407. 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
407	+/-	-	-	--	-	-	+	-	-	-	--	-

**Figure 7.1: Significance of effects pre-mitigation, Site Ref: 407**

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
407	+/-	+	0	--	0	-	+	-	0	-	--	-

**Figure 7.2: Significance of effects post-mitigation, Site Ref: 407**

7.6. Richborough Estates disputes the above post-mitigation findings, particularly in respect of biodiversity, landscape, and townscape and education.

7.7. The SA 2022 concluded that the development of the Site would result in a Negligible ('0') impact upon biodiversity and geodiversity. This conclusion has been reduced as the previous 2021 SA concluded the site would make an uncertain ('+/-') contribution to biodiversity and geodiversity. It is unclear why the council have altered their conclusion on this matter. Richborough Estates does not support this conclusion especially considering the illustrative masterplan (found at Appendix 1) is landscape led with approximately 21.5ha of the site reserved for public open space whereby a net gain of 10% biodiversity will be sought. As such, it is contented that the SA impact score for Biodiversity and Geodiversity should duly be tempered to a Minor Positive ('+') score.

- 7.8. The SA concludes that the development of the Site would result in a Major Negative ('--') impact upon landscape and townscape. This appears to derive from the finding in the accompanying Green Belt Study that the development of the site would cause a 'high' level of harm to the purposes of the Green Belt.
- 7.9. However, despite the SA apparently considering the potential impact of mitigation, it does not appear that the opportunity to provide a country park at the Site has been considered. The NPPF is clear that compensatory improvements to the environmental quality and accessibility of remaining Green Belt land can be considered when undertaking Green Belt release.
- 7.10. Overall, as detailed further in Chapter 8 of this Representation, it is considered that Land off Wrottesley Park Road makes a 'moderate' contribution to the purposes of the Green Belt, rather than the 'high' contribution identified within the Green Belt Assessment.
- 7.11. In respect of other aspects, the site was only found to have 'moderate/moderate-high' landscape sensitivity or a 'minor negative' impact on landscape character, views from the public right of way network, views for local residents, urbanisation of the countryside and coalescence.
- 7.12. The finding that the site would have a Major Negative impact upon landscape and townscape accordingly appears to be based upon the finding that the site would result in a 'high' level of harm to the Green Belt. This 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.
- 7.13. It is contended that the SA impact score for Landscape and Townscape should duly be tempered to a Minor Negative ('-') score.
- 7.14. In respect of education, the site is identified as scoring a Major Negative ('--') against education. This is due to the fact that the site is located '...outside the target distances for primary and secondary schools.
- 7.15. In response to the above, Richborough Estates has amended the illustrative proposal to include land for a new primary school. This land is located to the southern extent of the site, immediately adjacent to the safeguarded land which is to be allocated through the LPR. This



proposed primary school could accordingly serve both sites, as well as other existing neighbouring homes.

- 7.16. It is considered that this represents a significant benefit of allocating Land off Wrottesley Park Road and should accordingly be reflected in the next iteration of the Sustainability Appraisal.
- 7.17. Regarding access to secondary schools, the Technical Note prepared by Hub sets out how discussions have taken place with SCC regarding potential new walk/cycle links to provide more direct linkages through the housing estate to the east. The links from the site would be encouraged by means of suitable crossing facilities of Wrottesley Park Road. In turn, this will facilitate access to busses on The Parkway at a walk of less than 1km from the Site, which provide regular services to and from Wolverhampton, from early in the morning (05:58) to late in the evening (22:45).
- 7.18. The site is therefore considered capable of providing access to both primary and secondary schools and should accordingly score a Minor Positive ('+') score in respect of education.

## 8. Land West of Wrottesley Park Road, Perton

### Site Description

- 8.1. Richborough Estates has current land interests in Land West of Wrottesley Park Road, Perton. The site is located to the west of Wrottesley Park Road and to the north and immediately adjacent to housing allocation and safeguarded site ref: 239 contained within the adopted Site Allocations Document (SAD).
- 8.2. Land at Wrottesley Park Road comprises a number of field parcels is currently in agricultural use which total approximately 45.9 hectares. The parcels of land are subdivided by existing tree/hedgerow boundaries associated with the agricultural use of the land. The parcels are accessed via Wrottesley Park Road to the east or via a private road to the north.

### Proposed Development

- 8.3. An Illustrative Masterplan is included at Appendix 1 to this representation, which demonstrates how the site is capable of accommodating 250 new dwellings, as well as associated public open space, drainage, play areas and landscaping.

### Green Belt

- 8.4. 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.
- 8.5. 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.
- 8.6. 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.

- 8.7. 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**

- 8.8. 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 West of Wrottesley Park Road: Contributions to Green Belt Purposes**

- 8.9. The Green Belt Study shows Land West of Wrottesley Park Road, Perton, as falling within Green Belt Sub-Parcel reference: S54B – 'Perton Park/Cranmoor/Wrottesley Park', 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 is close or adjacent to the West Midlands conurbation, contains no significant urban development, and has strong openness. It retains a stronger relationship with the wider countryside than with the urban area.	Strong
P2: Preventing the merging of neighbouring towns	Land plays no significant role due to the distance between the West Midlands conurbation and Albrighton, the nearest town to the west.	Weak / No contribution
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (i.e., an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	Strong
P4: Preserve the setting and special character of historic towns	Land does not contribute to the setting or special character of a historic town	Weak / No contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong

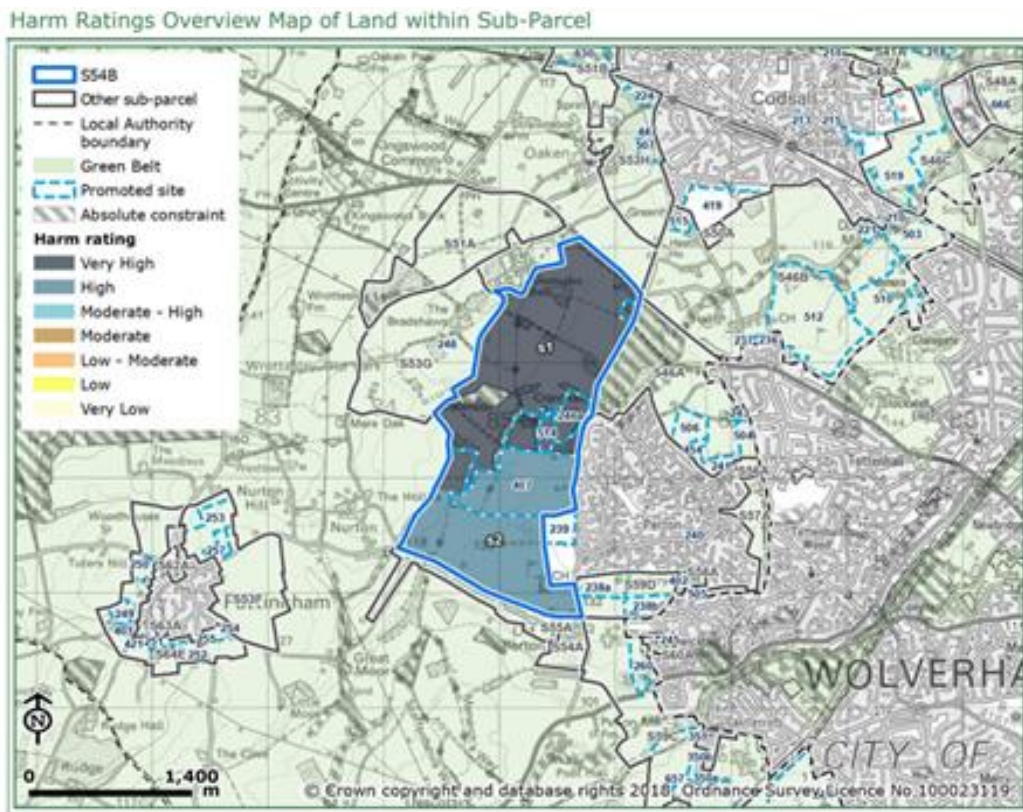
**Table 8.1: Land Parcel S54B Contribution Towards Green Belt Purposes**

8.10. The Study goes on to identify that, should Green Belt Sub-Parcel ref: S54B be released for development, the resulting harm would be 'high', stating:

*'The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. This part of the sub-parcel directly adjoins the settlement of Perton. The expansion of Perton into the sub-parcel would result in a weaker Green Belt boundary than that formed by Wrottesley Park Road and tree cover along the golf course boundary that forms a boundary to land released for existing development*



allocations. Therefore, release of this part of the sub-parcel would constitute a limited weakening of the Green Belt. Loss of openness between Perton and Nurton/Old Perton would weaken distinction between the two but would not increase overall harm.'



**Figure 8.1: Harm Ratings for Land Parcel S59B**

8.11. Whilst the conclusions of the above assessment are noted, it remains that Green Belt Sub-Parcel ref: S54B extends significantly beyond Land off Wrottesley Park Road, Perton (particularly to the north), which itself serves a reduced function against the five purposes of the Green Belt, as assessed below.

**To Check the Unrestricted Sprawl of Large Built-Up Areas**

8.12. The site relates well to the existing residential edge of Perton, whilst also being located immediately north of Housing Allocation Reference: 239. The new allocation Reference 239 will result in the provision of residential development west of Wrottesley Park Road, significantly altering the character and appearance of this area. The masterplan illustrates

that development is not proposed to extend any further than the western boundaries of the proposed housing allocation, meaning development would not extend any further westward into the countryside.

- 8.13. The site is bounded to the north by woodland, containing the site both physically and visually within the wider landscape whilst providing a strong boundary to restrict future development. It is clear that the site has defensible boundaries on all sides and would form a natural extension to the existing urban area and as such, the site is not required to check the unrestricted sprawl of the existing built-up area.
- 8.14. Lastly, the provision of a country park to the western portion of the site would serve to restrict the sprawl of the built-up urban area in the long-term, providing not only a visual screen to any development on the site but a physical barrier to development extending any further west.
- 8.15. It is therefore considered that the site makes a 'moderate' contribution to checking the unrestricted sprawl of large built-up areas, rather than the 'strong' contribution identified within the Green Belt Study.

#### **To Prevent Neighbouring Towns from Merging into One Another**

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

#### **To Assist in Safeguarding the Countryside from Encroachment**

- 8.18. Whilst the site contains some characteristics of open countryside, such as an absence of built development, it remains that the site has durable defensible boundaries that are afforded clear physical enclosure from the wider Green Belt. Furthermore, due to the existing uses that surround the site, its development would prevent further encroachment into the countryside. Whilst these boundary hedgerows are in place, they are degraded and gappy in places. 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 west.

- 8.19. 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**

- 8.20. Perton is not a historic town. The site is situated away from the Conservation Area and there are no views towards any heritage assets from within the site area. As such the removal of the site from the Green Belt would not affect the purpose of preserving the setting and special character of a historic town.

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

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

- 8.22. 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.

- 8.23. 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**

- 8.24. Overall, it is therefore considered that Land West of Wrottesley Park Road, Perton, 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: S54B. This contribution is summarised in the table overleaf:

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

**Table 8.2: Land off Wrotesley Park Road, Green Belt Assessment**

### Compensatory Improvements

- 8.25. Paragraph 142 of the NPPF confirms that, when releasing Green Belt land for development, local plans should ‘... set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land’.
- 8.26. A country park delivered at Land off Wrotesley Park Road would remain in the Green Belt and would serve as an enduring defensible boundary in the long-term, beyond the plan period. In particular, the country park would provide an opportunity to give residents access to the wider Green Belt and a significant area of green infrastructure with potential to link to the wider public Right of Way network beyond. The Illustrative Masterplan included within the Vision Document indicates that the country park could provide a number of environmental and accessibility benefits, including: a café/visitor centre, a community orchard, an informal sports area, an equipped play area, natural play areas, a picnic area, wildflower meadows, heathland areas, formal and informal walking routes, and connectivity to wider public right of way network.
- 8.27. These benefits should be considered when assessing overall Green Belt harm.

### Green Belt Harm

- 8.28. Given the reduced impact upon the five purposes of the Green Belt set out above, is contented that the Green Belt harm identified within the Study should be reduced from 'moderate-high' to 'low-moderate.'
- 8.29. It is the view of Richborough Estates that the site makes a moderate contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. The expansion of Perton into the site would serve to facilitate the delivery of a new country park, which would result in a strong Green Belt boundary. The site would form a logical location for the expansion of the settlement edge, and new Green Belt boundaries could be readily drawn without compromising the functions of the designation. The provision of a new country park in this location would provide compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land, in accordance with Paragraph 138 of the NPPF.
- 8.30. Therefore, release of this site would constitute a limited weakening of the Green Belt.

### **Landscape Sensitivity**

- 8.31. South Staffordshire District Council has produced a Landscape Study (2019) which forms part of the Local Plan Review evidence base. The majority of Land off Wrottesley Park Road falls with Landscape Parcel Reference: SL29S1, with the western edge of the site falling within SL29S2. These two landscape parcels subsequently fall within the 'Settled Farmlands' Landscape Character Type. The landscape areas are located west of Perton and Wightwick (Wolverhampton) and include a narrow strip of land which separates the two settlements. The southern boundary is formed by the A454, the eastern boundary by the settlement edge, and the south-western boundary by Pattingham Road. Nurton Brook forms the western boundary, and the northern boundary is formed by field boundaries. The area incorporates Perton Park Golf Course.
- 8.32. An extract of the Council's Appraisal of Landscape Sensitivity is included below:

<b>Characteristic / Attribute</b>	<b>Lower Sensitivity to Development</b>	<b>Moderate Sensitivity to Development</b>	<b>Higher Sensitivity to Development</b>
<b>Scale</b>	Fields separating Perton and Wightwick are	The area is dominated by regular medium to	

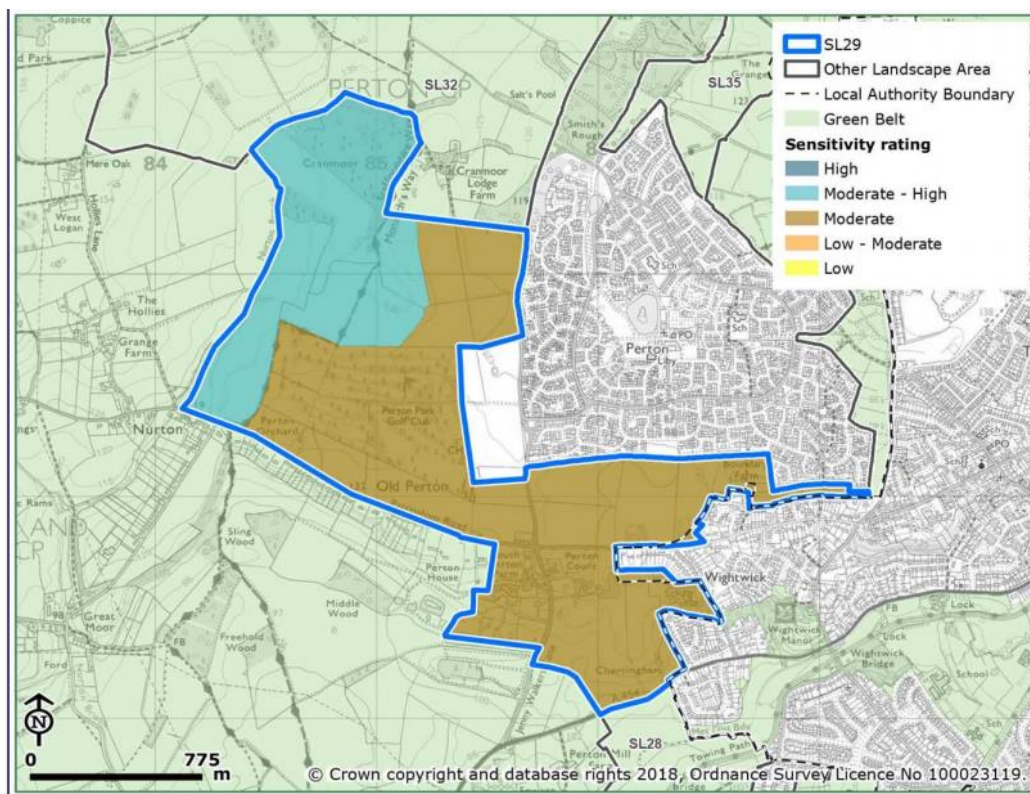
	<p>smaller in scale with outgrown hedges or fenced boundaries and generally used for horse grazing. As the gap between the settlements narrows to the west, it is characterised by scrubby woodland.</p>	<p>large scale arable fields divided by mature trimmed hedgerows with occasional hedgerow and in-field trees.</p>	
<p><b>Landform</b></p>	<p>The landform is very gently undulating, with elevations between 100m and 140m AOD. To the west of Perton the landscape rises to the west before descending to Nurton Brook. To the south, the landform is a gentle slope enclosed by a more pronounced scarp slope south of Pattingham Road.</p>		
<p><b>Landscape pattern and time depth</b></p>		<p>Field patterns are mixed in origin and include 19th century reorganised piecemeal enclosure, 18th/19th century semi-planned enclosure, as well as post-war amalgamated fields.</p>	
<p><b>'Natural' character</b></p>		<p>Priority habitat deciduous woodlands near Cranmoor and tree belts along the Staffordshire Way are identified as Ancient Woodland. The remaining woodland is predominantly coniferous, including planting within the Perton Park Golf Club. Natural features of value include the mature hedgerow and occasional in-field trees.</p>	

<p><b>Built character</b></p>	<p>Built features are limited to a number of modern farms and properties along Pattingham Road and within the golf club.</p>	<p>A limited number of historic features important to landscape character including Trinity Cottage and a dovecote associated with South Perton Farmhouse which are Grade II Listed.</p>	
<p><b>Recreational character</b></p>	<p>A large part of the area is within Perton Park Golf Club which provides restricted recreational opportunities.</p>		<p>The promoted long-distance Monarch's Way passes through the west of the area. Two footpaths cross the narrow strip of land between Wightwick and Perton.</p>
<p><b>Perceptual aspects</b></p>	<p>The golf course introduces an urbanised element to the landscape.</p>		<p>The north and west of the area has a strongly rural character and reads as part of the wider countryside, becoming particularly tranquil with an experience of 'dark skies' away from the settlement edge.</p>
<p><b>Settlement setting</b></p>	<p>Coniferous plantation at Perton Golf Club provides enclosure to the south west of the settlement reducing its sensitivity.</p>	<p>The area provides a rural setting to Perton and ribbon development along Pattingham Road extending from Nurton. However, settlement on the edge of Perton is generally inward looking and Wrottesley Park Road provides an abrupt edge to the settlement.</p>	<p>The settlement edge of Wightwick is looser and more rural in character than the southern settlement edge of Perton. The two settlements are separated by an increasingly narrow buffer of open green space which has an important role in preventing coalescence.</p>
<p><b>Visual prominence</b></p>	<p>The landscape is not visually prominent within the wider landscape due to its</p>	<p>The rising topography to the north west of the area and the stream valley sides</p>	

	gently undulating topography and large areas of woodland which provide enclosure.	along the Nurton Brook are visible within the wider landscape.	
<b>Inter-visibility with adjacent designated landscapes or promoted view points</b>	There is no inter-visibility with any designated landscapes or marked viewpoints.		
<b>Landscape Sensitivity Judgement (SL29S1)</b>	The landscape is considered to have a moderate overall sensitivity to residential development. The narrow buffer of open agricultural land between the southern settlement edge of Perton and Wightwick has a particular sensitivity due to its role in preventing coalescence between the settlements.		Moderate
<b>Landscape Sensitivity Judgement (SL29S2)</b>	The increasingly rural and wooded landscape to the north and west of the area at Cranmoor and along the Nurton Brook, is more sensitive to residential development due to its stronger natural character and visual prominence.		Moderate-high

8.33. The Study concludes that Landscape Parcel SL29S1 (which encompasses the whole of the developable area of Land at Wrottesley Park Road) is considered to have a 'moderate' overall sensitivity to residential development, as identified on Figure 8.3 below.





**Figure 8.3: Landscape Sensitivity Rating Parcels SL29S1 and SL29S2**

- 8.34. The findings of the Landscape Study are not necessarily disputed by Richborough Estates. However, the site has previously been assessed through the Site Allocations Document process as having a ‘low impact’ on landscape sensitivity. It is, therefore, not understood how the landscape sensitivity of the site has increased, particularly now land to the south (Site Allocation Ref: 239) has been allocated for residential development.
- 8.35. Nevertheless, it is considered that the development of the site for residential purposes represents an opportunity to strengthen existing field boundaries within and to the edges of the site. Furthermore, the development of the site facilitates the opportunity to provide a new country park, which would serve to define the western edge of Perton.
- 8.36. The county park would be partly located within the area of greater landscape sensitivity (parcel SL29S2) and would contribute towards the natural rural character of the land, easing the transition between the urban edge and the countryside in this location.
- 8.37. The illustrative masterplan for the site (see Appendix 1) 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. The proposals also provide a significant opportunity to improve the legibility of the Staffordshire Way.

## Sustainability

8.38. 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.

8.39. 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.

8.40. Perton is identified as falling within 'Tier 2 Settlements' which are described as:

*'Settlements within this tier typically have a food store and a range of services and facilities and education establishments, but the level of provision will typically be less than Tier 1 villages. These villages do not have access to rail stations and have lesser levels of employment access than Tier 1 villages. There is still a degree of access to services outside the village via public transport.'*

8.41. The overall settlement hierarchy scoring for Perton is presented below.

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

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

**Figure 7.4: Settlement Hierarchy Scoring for Perton, RSFA (2021)**

- 8.42. Whilst the identification of Perton as a Tier 2 Settlement is not disputed overall, Richborough Estates considers that Perton benefits from ‘medium’ access to employment opportunities, rather than ‘low’ as identified within the RSFA.
- 8.43. The RSFA assesses access to employment locations through ‘Hansen’ scores, which measures the number of destinations that can be accessed within a 60-minute journey time, the disbenefits of travel in terms of journey time, origin point population and the total number of jobs available at the destination. This is calculated using a digital model.
- 8.44. Whilst the detailed modelling is not available for scrutiny as part of this consultation, it remains that Perton benefits from frequent bus services to Wolverhampton (the number 10 service), operating approximately every 15–25 minutes from 6am until 7:30pm, whereupon they become hourly until 10:45pm. The journey time between Perton and Wolverhampton is scheduled as taking 29 minutes. In the context of the Hansen scoring identified within the RSFA, that leaves an additional 31 minutes to make an onward journey to an employment destination.
- 8.45. Whilst this represents a simplification of the modelling that appears to have been utilised by the Council, it remains that Wolverhampton is the largest settlement adjacent to Perton (and indeed, South Staffordshire District), both in terms of total number of jobs offered, but also the diversity of jobs offered. It is therefore not understood how Perton could be said to have ‘low’ access to employment locations.

### **Impact on the Historic Environment**

- 8.46. There are no statutory designated heritage assets within the immediate vicinity of the site. Heritage Gateway depicts two non-designated heritage assets within the site, which include two north south aligned field boundaries that are shown on a map of Perton Manor dated to 1663 (MST18002) and a track way dated to the same period. Work undertaken to date, however, has identified that these would not be a constraint to development within the site or require to be designed around.
- 8.47. In summary, the technical work undertaken to date concludes there are therefore no heritage constraints to the allocation of the site for residential development.

### **Surface Water Flooding**

- 8.48. Richborough Estates has commissioned a technical review of the flood risk and drainage issues, produced by BWB. The report identifies that the site lies within Flood Zone 1; less than 1 in 1,000 annual probability of river or sea flooding. Surface water flood mapping indicates the potential for pluvial flooding along the northern boundaries of the site, however, this is anticipated to be managed and mitigated as part of the development proposals and drainage strategy.
- 8.49. OS Plans and an initial site walkover would suggest a system of ditches and drains exists flowing north along Wrottesley Park Road towards the roundabout and ultimately to the River Penk. As part of the detailed Flood Risk Assessment, investigations would be made to verify a surface water outfall.
- 8.50. With such mitigation measures in place, it is considered that flood risk to and from the development will be managed and betterment will be provided by the development.

### **Highways (Accessibility to the Site)**

- 8.51. The site is sustainably located, and a range of local facilities are accessible by modes other than the car. Shared foot/cycle way provision and two new pedestrian points of access could be proposed into the village from Wrottesley Park Road, ensuring the sustainable access to and from the site will be excellent.

- 8.52. Vehicular site access can be provided in accordance with relevant local and national design guidance onto Wrottesley Park Road, ensuring there would be no material impact on highway safety or highway capacity as a result.
- 8.53. An initial strategy has been developed to improve the operation of Perton light junction on the A41, focussed on increasing the capacity of the two A41 approach arms. The assessment with this improvement shows that the junction will operate within capacity during the AM and PM peak periods and also shortens the cycle time to 90 seconds. The general approach to this improvement has been agreed with local highway authority.
- 8.54. In summary therefore, this strategic work demonstrates that the development site can be delivered on the highway network with the improvements required being deliverable within highway land.
- 8.55. In addition, consideration has been given to the provision of new pedestrian linkages between the site and existing built-up area of Perton. Land to the east of Wrottesley Park Road has been secured to enable pedestrian linkages to be provided, offering accessibility to services and facilities on foot.

### **Impact upon the Natural Environment**

- 8.56. Initial work undertaken by EDP has revealed that there are no 'in principle' constraints to the development of housing at the site with regard to ecology. There are no statutory sites of nature conservation importance at an international (e.g., Special Areas of Conservation) or national (e.g., Sites of Special Scientific Interest) scale located within a 5km radius of the site.
- 8.57. The site consists predominantly of arable land with a network of hedgerows and occasional hedgerow and field boundary trees. The network of hedgerows and any notable trees have been, and will continue to be, sought to be retained within any proposals and the site offers opportunities for such networks to be enhanced.
- 8.58. From the initial work undertaken, there is a low overall diversity of habitats on the site and those that it does support are common and widespread within the local landscape. Therefore, it is considered that the ecological value of the site is limited.

8.59. There are considerable opportunities for biodiversity enhancement through habitat creation given that it proposes a significant area of open space both within the development area and the proposed Country Park. The creation of new habitats should be designed to contribute towards targets set within the UK and Staffordshire Biodiversity Action Plan. The scheme specifically has the opportunity to contribute to the targets for the following BAP habitats: lowland wood and pasture/parklands; lowland acid grassland; ponds and lakes; reedbeds; wildflower meadows; and biodiverse architecture.

### **Impact on Environmental Quality**

8.60. The agricultural site is unlikely to have significant issues in relation to contamination, and the surrounding context of the site is not considered to represent constraints in relation to air quality and noise.

8.61. Whilst it is accepted that development is unlikely to improve the environmental quality of the site as there are no existing issues of contaminated land, development would not give rise to any further environmental quality issues.

### **Recreation and open space**

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

### **Site-Specific Opportunities**

8.63. As set out previously within this Representation, the development of the site for residential purposes presents the opportunity to deliver a new country park at Perton, which has previously been identified within the Council's Infrastructure Delivery Plan as a future project.

8.64. This represents a significant benefit of allocating Land at Wrottesley Park Road, Perton, for residential development. The development of the site could also deliver:

- Delivery of circa 250 dwellings to include market and affordable homes and a mix of property types aligned to local needs;

- Provision of land for a new primary school to serve both the Site and the draft allocation to the south;
- Strong Green Belt boundary provided utilising existing trees and hedgerows;
- Green Belt compensation measures
- New residential links provided to wider residential areas and Perton Centre to maximise connectivity and encourage sustainable trips;
- Provision of a network of green links and corridors and provision of equipped play;
- Delivery of a new Country Park to serve Perton that connects into the Staffordshire Way;
- Retention of existing field pattern;
- Provision of a new visitor centre/café ancillary to the Country Park;
- Increased biodiversity and wildlife habitats, including incorporation of Sustainable Drainage Systems (SuDS);
- Creation of new, enduring Green Belt boundary and provide opportunity to provide recreational access, enhanced landscapes, and increased biodiversity.
- Funding towards improvements for the A41

## **Suitability**

- 8.65. The information set out above demonstrates that Land West of Wrottesley Park Road is a suitable site for development.

## **Deliverability**

- 8.66. There is an agreement in place between the landowner and Richborough Estates to facilitate the development of the site.
- 8.67. There are no constraints likely to render the site undeliverable in the Plan period. The site is available now.



- 8.68. There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the impacts of the development of the site can be mitigated and, in many cases, a positive outcome can be achieved.
- 8.69. The site is deliverable and immediately available and subject to allocation, could deliver homes and associated community early in the plan period.





## 9. Conclusion

- 9.1. This representation is made by Pegasus Group on behalf of Richborough Estates Limited to the South Staffordshire Local Plan Review, Publication Plan (Regulation 19). This representation relates to Land West of Wrottesley Park Road, Perton, 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 West of Wrottesley Park Road, Perton.
- 9.3. The site provides the opportunity to provide a primary school to serve not only the site itself, but also the draft allocation to the south. This is considered to be a significant benefit to the overall sustainability of the scheme.
- 9.4. The information contained within this representation, read in conjunction with the appended illustrative masterplan, demonstrates that land off Wrottesley Park Road 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.
- 9.5. Richborough Estates considers that their land interests Land West of Wrottesley Park Road, Perton, are a suitable and deliverable site for residential development, subject to release from the Green Belt and that the site could deliver development to meet the identified housing needs within the Plan period.



# Appendix 1

Illustrative Masterplan



- Key**
- Application site boundary
  - Open space
  - Indicative surface water attenuation basin
  - Existing (retained) trees & hedgerow
  - Indicative proposed planting
  - ✦ Potential for equipped play/LEAP
  - ✦ Natural play 'station'
  - Existing Public Right of Way
  - Proposed footpath connector improvements to Parkway Roundabout
  - Proposed hard surfaced pedestrian/cycle link
  - Proposed mown path
  - Indicative development cell
  - Potential primary school site: 15.2ha





# Appendix 2

Transport Note

## Technical Note

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**Project Number:** T19535

**Project:** Wrottesley Park Road, Perton

**Title:** Transport Technical Note 2 – LP Review

**Date:** 08.12.21

**Prepared By:** Gerard McKinney

**Distribution List:**

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### Background

- 1.1 Hub Transport Planning was commissioned by Richborough Estates to provide supporting information in relation to the promotion of land to the west of Wrottesley Park Road, Perton. The proposal site is referred to as site 407 in the SA. Allocated safeguarded land lies to the south of the development proposal and is referred to as site 239 in the SA.
- 1.2 Richborough Estates and Hub Transport Planning Ltd have been in discussion with Staffordshire County Council (SCC) for over two years regarding the potential development and the opportunities for transport mitigation and improvements that could come forward with the allocation of the proposal site.
- 1.3 We understand that SCC are content with the transport merits of site 407 in terms of its impact on the transport network, subject to improvements to the A41/Wrottesley Park Road/Heath House Lane signalled junction and local improvements to active and sustainable travel.
- 1.4 Despite this South Staffordshire Council (SSC) has not allocated site 407 in the current LP Review. The purpose of this note to examine the transport merits of site 407 and to provide evidence as to why the site should be included within the LP.

### SSC LP Review Summary

- 1.5 The summary of the SSC SA is provided in tabular form overleaf. The review indicates that all sites assessed are scored with a slight negative on Transport & Accessibility pre-mitigation and post-mitigation.
- 1.6 Our understanding of the proposed 'mitigation' for the traffic signalled junction design ultimately arrived at for the A41/Wrottesley Park Road/Heath House Lane as being suitable to include site 239 amounted to simple alterations to intergreen and overall signal timings at the A41/Wrottesley Park Road/Heath House Lane signalled junction. Such changes are within the gift of SCC without and are not physical improvements.

## Technical Note

Pre-Mitigation													Post-Mitigation												
Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	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		Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
238	+/-	-	+/-	-	-	-	+	-	-	-	-	-	238	+/-	+	+/-	-	-	-	+	-	0	-	-	-
239	+/-	-	+/-	-	-	-	+	-	-	-	-	-	239	+/-	+	+/-	-	0	-	+	-	0	-	-	-
241	+/-	+	+/-	-	-	-	+	-	-	-	-	-	241	+/-	+	+/-	-	-	-	+	-	0	-	-	-
243	+/-	-	+/-	-	-	-	+	-	-	-	-	-	243	+/-	+	+/-	-	-	-	+	-	0	-	-	-
245	+/-	-	-	-	-	-	+	-	-	-	-	-	245	+/-	+	+/-	-	-	+	-	-	0	-	-	-
246a	+/-	-	-	-	-	-	+	-	-	-	-	-	246a	+/-	+	+/-	-	0	-	+	-	0	-	-	-
260	+/-	+	+/-	-	-	-	+	-	-	-	-	-	260	+/-	+	+/-	-	-	-	+	-	0	-	-	-
402	+/-	+	+/-	-	-	-	+	-	-	-	-	-	402	+/-	+	+/-	-	-	-	+	-	0	-	-	-
407	+/-	-	-	-	-	-	+	-	-	-	-	-	407	+/-	+	+/-	-	0	-	-	-	0	-	-	-
454	+/-	-	+/-	-	-	-	+	-	-	-	-	-	454	+/-	+	+/-	-	0	-	+	-	0	-	-	-
504	+/-	+	+/-	-	-	-	+	-	-	-	-	-	504	+/-	+	+/-	-	-	-	+	-	0	-	-	-
505	+/-	+	+/-	-	-	-	+	-	-	-	-	-	505	+/-	+	+/-	-	-	-	-	-	0	-	-	-
506	+/-	-	+/-	-	-	-	+	-	-	-	-	-	506	+/-	+	+/-	-	0	-	+	-	0	-	-	-
705	+/-	-	+/-	-	-	-	+	-	-	-	-	-	705	+/-	+	+/-	-	0	-	+	-	0	-	-	-

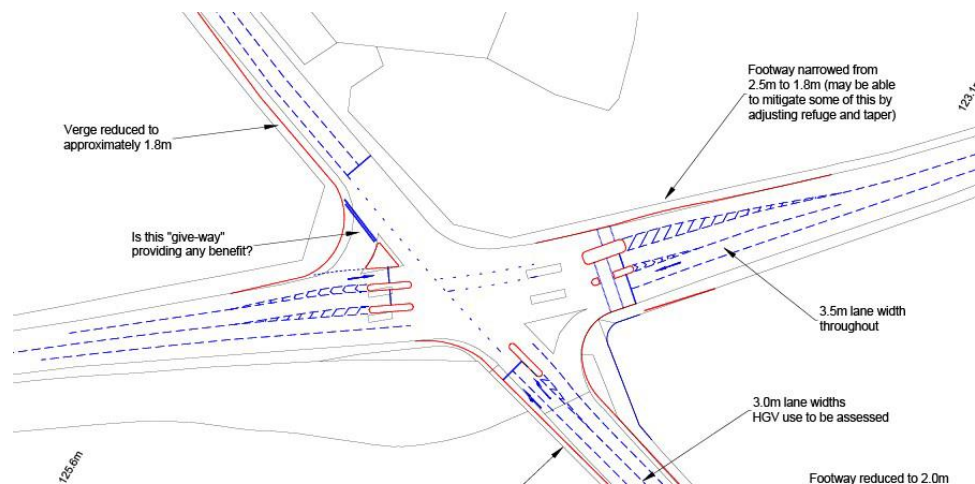
1.7 The SA concludes that allocations at Perton should be limited to the existing safeguarded land;

*‘reflecting the lack of a finalised junction improvement scheme at the A41 and the remoteness of Green Belt site options from education facilities’.*

1.8 As indicated in the opening paragraphs of this note we have been discussing the proposals at site 407 with SCC for over two years. Transport issues discussed over this period included the following; the operation of the traffic signals at the A41/Wrottesley Park Road/Heath House Lane, active travel routes to local facilities, and public transport services including services to schools.

### SCC Proposals at A41/Wrottesley Park Road/Heath House Lane Signalled Junction

1.9 SCC commissioned JCT to provide traffic modelling relating to a proposed improvement scheme at the A41 signalled junction (referred to as Option 2) as indicated in the sketch below.



## Technical Note

- 1.10 The modelling of the proposed scheme indicates very real capacity benefits for the junction in the PM peak hour and includes signalled pedestrian facilities not currently provided. The development impact of the proposal site 407 are minimal in the AM peak hour.
- 1.11 We understand that SCC has no objection to the inclusion of site 407 as an allocated site in the local plan on the basis that this junction improvement is in place.
- 1.12 Given that site 239 has previously been allocated with no physical improvements to the junction and offering little or no mitigation at this location, we can see no good highway reason why site 407 should not be allocated subject to a suitable contribution to provision of this scheme. Our understanding is that the scheme will not proceed without developer funding.
- 1.13 It is our view that the post-mitigation situation in relation to site 407, in relation to the traffic signals and taking a balanced view on peak hour operation and likely inter-peak and off-peak operation of the signals, ought to be neutral at worst i.e. an improvement to the current situation.

### Distance to Facilities and Potential Mitigation and Improvements

- 1.14 In discussion with SCC a potential new walk/cycle links have been identified to provide more direct linkages through the housing estate opposite. The links from the site would be encouraged by means of suitable crossing facilities of Wrottesley Park Road.

**Table 1 - Distance to Local Services**

Amenity	Distance
Pear and Partridge Public House	960m
Perton Village Centre (including Medical Centres, Pharmacy, Dentists, Opticians, Sainsbury's supermarket, Library, Vets, Post Office, Parish Council, Petrol Filling Station, Public House and Restaurants)	1.1km
Perton First School	1.1km
Perton Village Nursery	1.1km
Perton Golf Club	1.4km
Perton Primary Academy	1.6km
Perton Middle School	2.0km

- 1.15 Most facilities within Perton Village are within a 1km or so walk of the proposal site including; a first school, public houses, restaurants, medical centre, pharmacy, dentist, optician, Sainsbury supermarket, library, vets, and post office. Buses can be access on The Parkway at a walk of less than 1km. The Perton Primary Academy is within a mile walk of the proposal site.
- 1.16 As such the proposal site 407 is within SSC's suitable walking distance of one mile from first/primary education facilities.
- 1.17 Regardless of meeting the education walking distance criteria for primary education facilities, site 407 can offer the potential for a first/primary school on the land; thus much reducing the walk distances to primary education facilities for residents of the site and for existing and planned neighbouring developments.

## Technical Note

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- 1.18 SCC has also confirmed that with the improvements planned at the A41 junction and the linkages proposed towards Perton, they are content that the accessibility requirements of the site are met.

### Conclusions

- 1.19 SSC's conclusion regarding the non-allocation of site 407 (included at paragraph 1.7 of this report) is not supported by the evidence. Furthermore, the transport and accessibility mitigation and improvements proposed for the site; contribution to works at the A41, new footway/cycleway links and crossings, and a new school on the site, will provide enhancements for users of the transport network beyond just the residents of the proposal site.
- 1.20 Indeed, the highway authority (SCC), has stated that they could not support SSC's exclusion of site 407 from the local plan on transport and accessibility grounds.





# Appendix 3

Promotional Document



# LAND OFF WROTTESLEY PARK ROAD **PERTON**

P R O M O T I O N A L   D O C U M E N T

Prepared by Pegasus Group on behalf of Richborough Estates  
DECEMBER 2021 | BIR.4758\_08



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Prepared by Pegasus Group  
on behalf of Richborough Estates,  
December 2021. Project code BIR.4758. Document ref BIR.4758\_08.  
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INTRODUCTION & DOCUMENT PURPOSE		PLANNING POLICY CONTEXT		THE SITE AND SURROUNDING CONTEXT		VISION		INDICATIVE MASTERPLAN & DESIGN PRINCIPLES		WEST PERTON		DELIVERABILITY & KEY BENEFITS		COUNTRY PARK		SUMMARY & CONCLUSIONS	

THIS DOCUMENT IS DESIGNED TO BE VIEWED AS A3 DOUBLE SIDED







**THE SITE**

WROTTESELEY PARK ROAD





# INTRODUCTION AND DOCUMENT PURPOSE

## INTRODUCTION

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

## RICHBOROUGH ESTATES

- 1.2 Richborough Estates is a responsible and specialist strategic land promotion business founded with the aim of working in partnership with landowners. Our projects are located throughout the country ranging from residential schemes of around 50 dwellings to large urban extensions, including sites located within the Green Belt.
- 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 the most 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 Wrottesley Park Road. The extent of land controlled by Richborough is shown edged red on the Location Plan on Page 6 of this document.

## DOCUMENT PURPOSE

- 1.5 South Staffordshire Council is currently in the process of reviewing their Local Plan to identify and direct growth within the District to 2038. 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 to the west of Wrottesley Park Road will form a logical extension to Perton 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 This document also sets out the Vision for the site, informed by a consideration of the constraints and opportunities and an Indicative Masterplan demonstrating how the Vision can be achieved through a well-designed scheme. The document concludes with a concise summary of the site, the proposed development and its key benefits.
- 1.8 Overall, this Promotional Document presents a sustainable site to supports the site’s future allocation through the Local Plan Review process and promotes its release from the Green Belt.
- 1.9 This document has been prepared with input from the following Consultant Team:

**Planning:**  
Pegasus Group



**Urban Design:**  
nineteen47



**Landscape:**  
Pegasus Group



**Access & Movement:**  
Hub



**Flood Risk & Drainage:**  
BWB



**Heritage:**  
CgMs









2

PLANNING  
POLICY CONTEXT

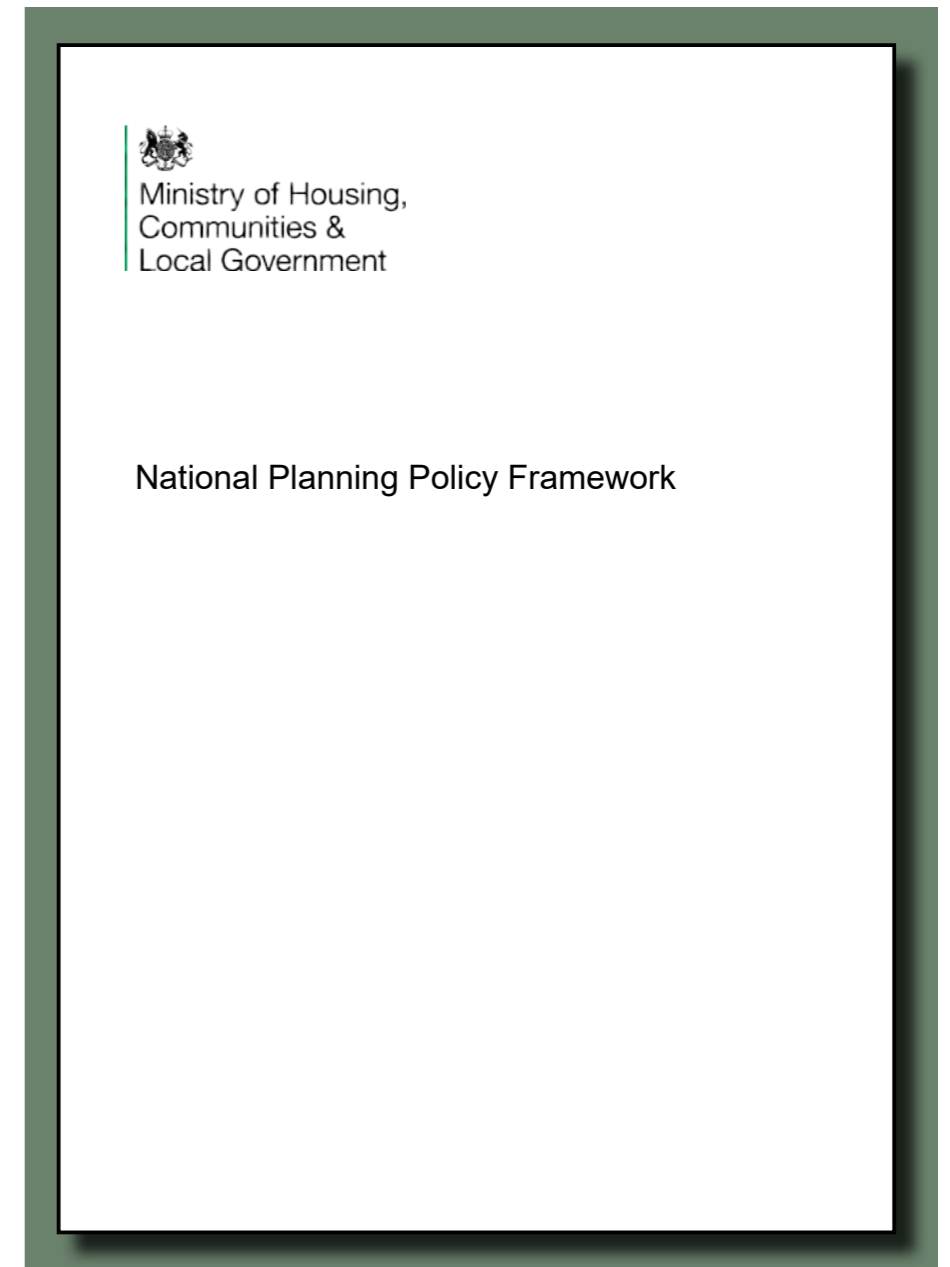


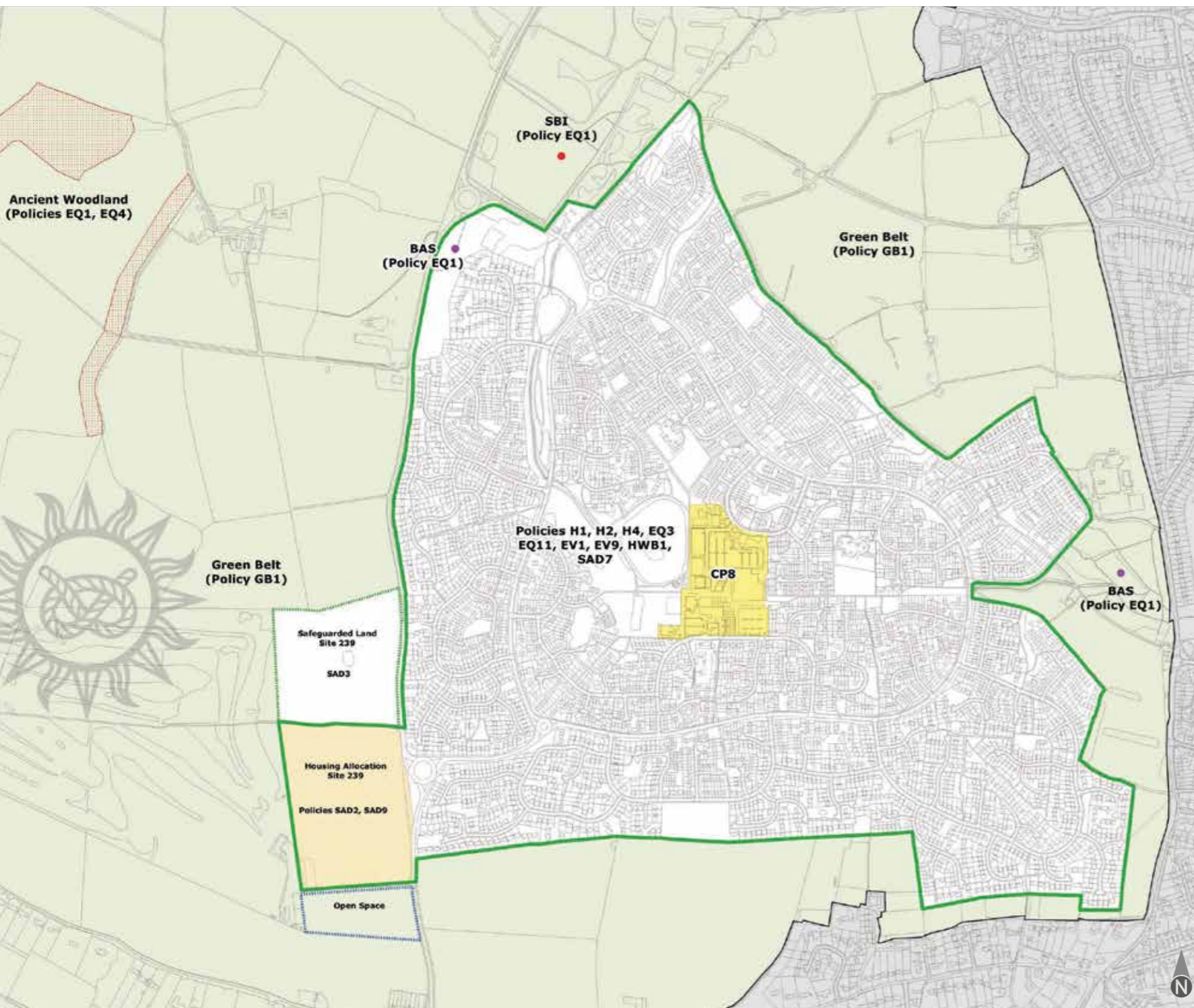


# PLANNING POLICY CONTEXT

## NATIONAL PLANNING GUIDANCE

- 2.1 In 2021, the Government published a revised National Planning Policy Framework (“Framework”) which replaces the previous guidance published in 2018 and 2019 and provides the overarching planning framework for England. Central to the Framework is a presumption in favour of sustainable development (paragraph 11). The Framework also seeks to boost the supply of housing and requires local authorities to plan positively for objectively assessed needs and maintain a sufficient supply of housing land.
- 2.2 Paragraph 139 of the Framework states that once the general extent of a Green Belt has been approved, it should only be altered in ‘exceptional circumstances’ through the plan-making process and that the amended Green Belt boundary should be “capable of enduring beyond the plan period”. There are exceptional circumstances which justify alteration to the Green Belt boundary in South Staffordshire District and the site offers an opportunity to release Green Belt in a sensitive manner, without harming its purposes and functions, as set out in paragraph 138 of the Framework.
- 2.3 Furthermore, paragraph 8 of the Framework sets out that sustainable development has three overarching objectives: economic, social and environmental. 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.
- 2.4 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 to the west of Wrottesley Park Road, Perton, 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.





ADOPTED LOCAL PLAN POLICIES MAP | NOT TO SCALE

## EXISTING DEVELOPMENT PLAN

- 2.5 The Development Plan for South Staffordshire currently comprises the adopted Core Strategy (adopted 11th December 2012) and the Site Allocations Document (adopted 11th September 2018).
- 2.6 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.
- 2.7 The policies map identifies the following designations for the site:
  - Green Belt (Policy GB1)
- 2.8 Perton does not lie within a Neighbourhood Area Designation and therefore a Neighbourhood Plan has not been progressed to date.

## SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW

- 2.9 The South Staffordshire development plan currently comprises the South Staffordshire Core Strategy (adopted in December 2012) and the South Staffordshire Site Allocations Document (adopted in September 2018). The current Strategy covers the period 2006-2028 and sets a housing requirement of at least 3,850 new homes to be delivered within this period which, at 175 dpa, is considerably lower than the need that has now been identified.
- 2.10 The Site Allocations Document (SAD) commits the District Council to carrying out an early review of the development plan in order to respond to the increasing need for development, both within South Staffordshire and the wider housing market area. The SAD also requires a new Local Plan to be submitted for an Examination in Public (EiP) by 2021.

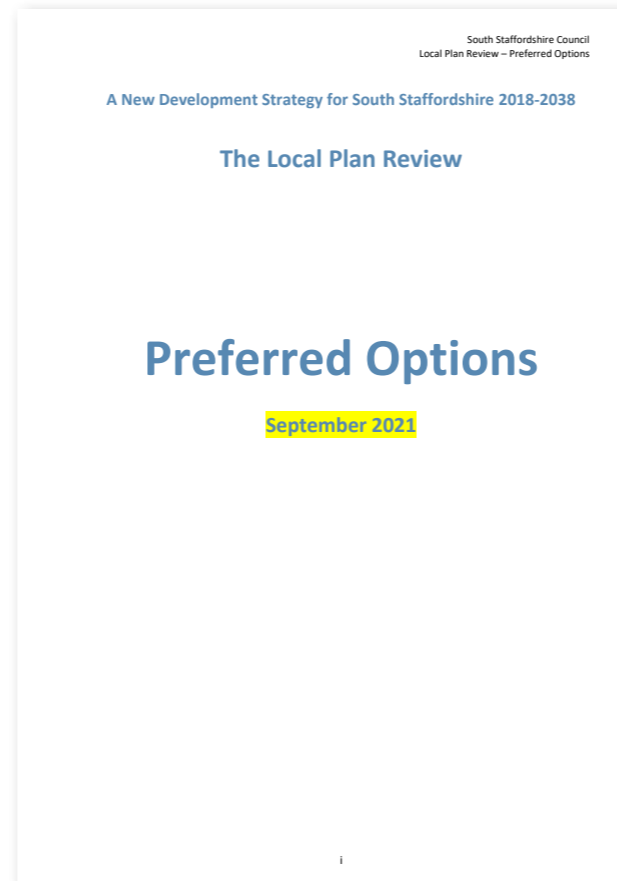
2.11 Richborough Estates supports the District Council's decision to carry out a review to ensure an up to date planning policy framework is in place to shape the District to 2038. The review provides an opportunity to address housing need, reflect new national planning guidance and provide a meaningful contribution to meeting needs of neighbouring authorities, where it can be demonstrated that they are unable to do so.

2.12 The Local Development Scheme (LDS) published in June 2020, proposed the following timetable for the Review:

Issues and Options Consultation	Oct/Nov 2018
Strategic Spatial Strategy and Infrastructure Delivery Consultation	Autumn 2019
Preferred Options Document	Autumn 2021
Publication Document	Summer 2022
Submission of Local Plan	Winter 2022/23
Local Plan Examination	Spring 2023
Adoption of Local Plan	Winter 2023

2.13 Richborough Estates notes that the LDS shows that the Local Plan Review will not be submitted for examination in line with the SAD requirement.

2.14 The draft Preferred Options version of the Local Plan Review is anticipated to begin on 1 November and will run for 6 weeks until Monday 13 December 2021. The Preferred Options document contains an overall housing target of 8,881 dwellings, comprising 4,131 derived from South Staffordshire's own housing need calculated by the Government's Standard Method, 750 dwellings arising from completions in the District since the start of the plan period (2018-2021) and an additional 4,000 dwellings to contribute towards the unmet needs of the Greater Birmingham Housing Market Area.



2.15 A revised Settlement Hierarchy is set out within the Local Plan Review, which highlights Perton as a "Tier 2" settlement. Tier 2 settlements are considered to be some of the most sustainable of the District's villages, with good access to services and facilities. It is concluded that:

***"Settlements within this tier typically have a food store and a range of services and facilities and education establishments, but the level of provision will typically be less than Tier 1 villages. These villages do not have access to rail stations, but still have a degree of access to services outside the village via public transport."***

2.16 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.

2.17 Perton is completely constrained by Green Belt, with the exception of an area of Safeguarded Land directly south of Richborough Estates' land interests. 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 Perton. 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 Perton to allow for future needs to be met.

### CASE FOR GREEN BELT RELEASE

2.18 Given the need to accommodate an increased amount of housing and employment land, the Council concluded there were exceptional circumstances to release Green Belt land through the adoption of the Site Allocations Document. The need to consider Green Belt release through the Local Plan Review process is acknowledged through the Spatial Housing Strategy and Infrastructure Delivery consultation document to support the preferred strategic option for growth. There are exceptional circumstances that exist for the targeted release of Green Belt land in Perton to meet identified housing needs in a sustainable location within this Tier 2 village.





# 3

## THE SITE AND SURROUNDING CONTEXT







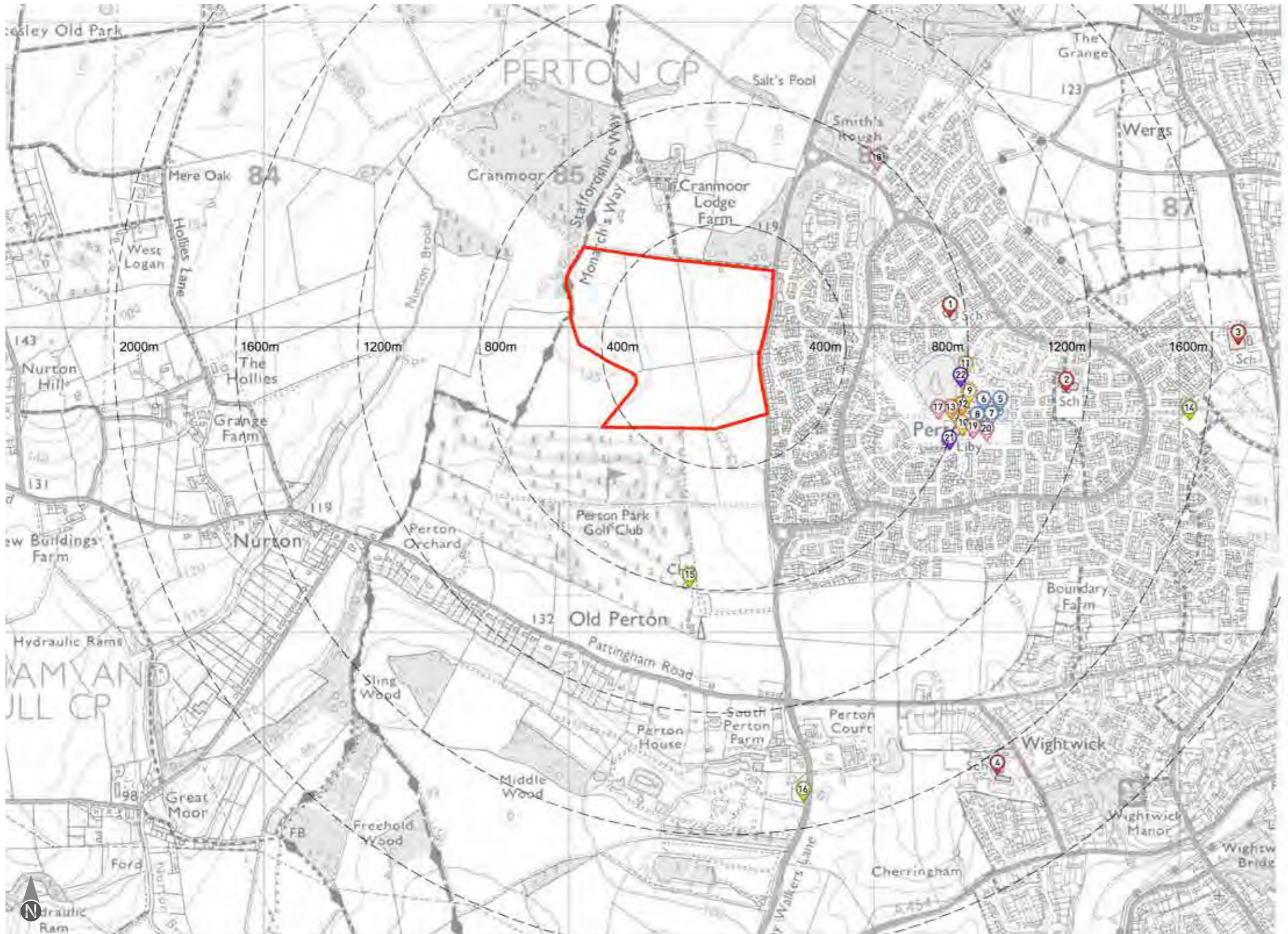
# THE SITE AND SURROUNDING CONTEXT

## LAND AT WROTTESLEY PARK ROAD

- 3.1 The site is located to the west of Wroottesley Park Road and to the north and immediately adjacent to safeguarded land allocation ref: 239 contained within the adopted Site Allocations Document (SAD).
- 3.2 The site comprises a number of field parcels currently in agricultural use which total approximately 45.9 hectares. The parcels of land are subdivided by existing tree/hedgerow boundaries associated with the agricultural use of the land.
- 3.3 Richborough Estates has secured an interest in this site.

## SURROUNDING AREA

- 3.4 The site is located adjacent to the current built up area of Perton with good access to the village centre, including being within walking distance of its many facilities and bus links.
- 3.5 The site also benefits from good access to further services and facilities located within the wider urban area, including Wolverhampton. 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, library, dining and coffee facilities, surgery, dental practice and a range of schools. All of these services can be reached easily by foot from the site.
- 3.6 The site provides an opportunity to deliver much needed housing, together with all necessary supporting infrastructure. Additionally, the site provides the opportunity to deliver a new country park at Perton, resulting in an opportunity for residents to access the wider Green Belt and significant areas of green infrastructure with potential to link to the wider public right of way network beyond.



- Key**
- Site location
- Education**
- 1 Perton First School
  - 2 Perton Primary Academy
  - 3 Perton Middle School
  - 4 Wightwick Hall School
- Shops**
- 5 Sainsbury's/ Sainsbury's Fuel
  - 6 Perton Post Office
  - 7 Martins Convenience Store
  - 8 Taylor's Frozen Foods
- Healthcare**
- 9 Lloyds Pharmacy
  - 10 Tamar Medical Centre
  - 11 Lakeside Medical Centre
- Places of Worship**
- 12 The Church at Perton
  - 13 Lakeside Community Church
- Leisure**
- 14 Perton Pavilion
  - 15 Perton Park Golf Club
  - 16 Tough Guy
- Public Houses & Restaurants**
- 17 Wrottesley Arms
  - 18 Pear and Partridge
  - 19 Flamingo Pink
  - 20 Perton Fish Bar
- Community**
- 21 Perton Library
  - 22 Perton Parish Council

LOCAL FACILITIES | NOT TO SCALE



## LOCAL FACILITIES, AMENITIES & SERVICES

- 3.7 There are a number of local facilities within walking distance of the site, with all local facilities listed falling within the suggested 2km upper limited as referenced in Manual for Streets (MfS) guidance.
- 3.8 Both local first schools and one secondary school are located within the (Institute of Highway and Transportation (IHT) maximum walking distance to schools of 2km.

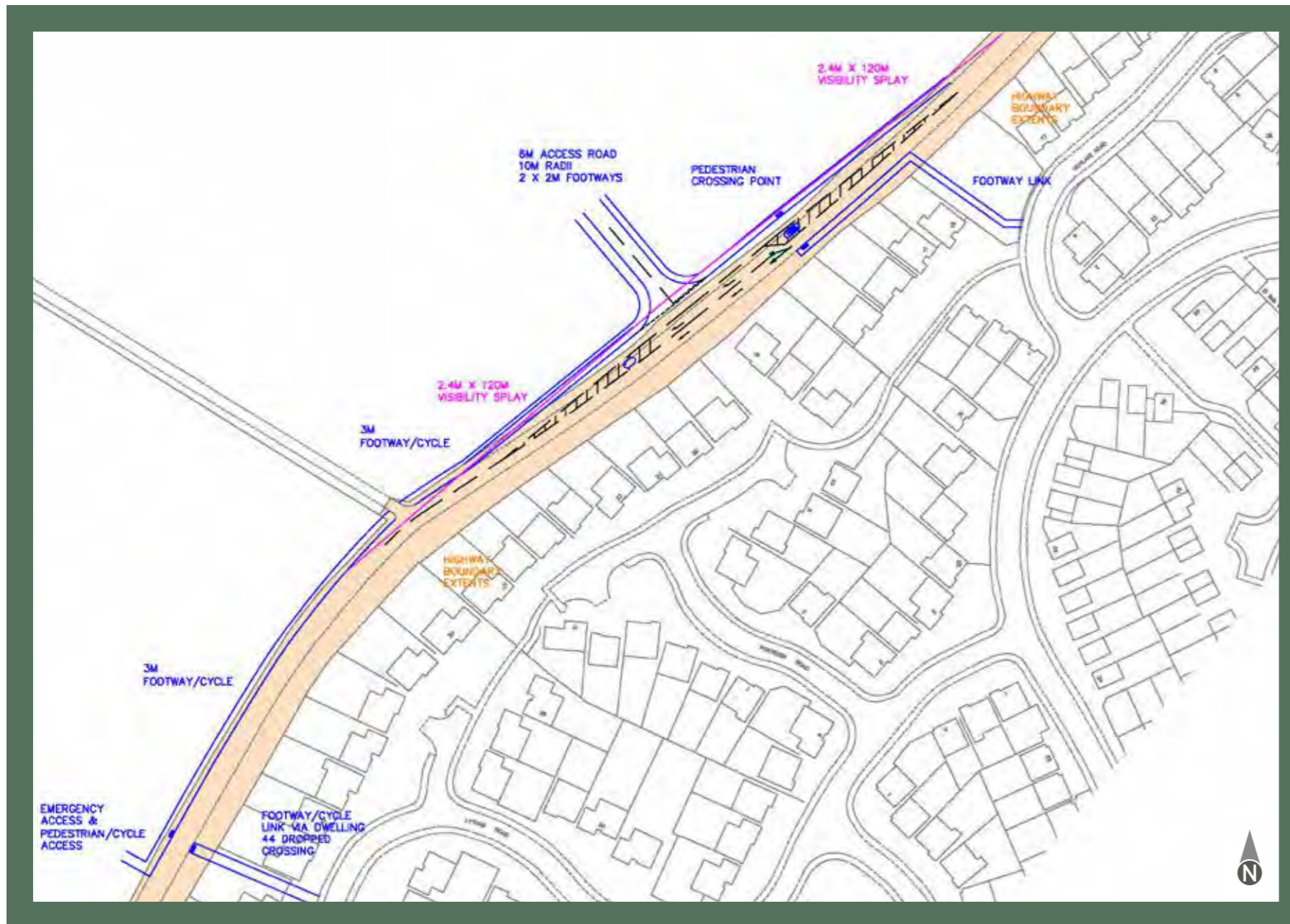
## ACCESS & MOVEMENT

### LOCAL TRANSPORT NETWORK

- 3.9 Highway (Including Pedestrian Networks): Wrottesley Park Road is the primary local distributor road between the A41 to the North and A454 to the south. The road varies between 6m and 7m wide with grass verges on both sides of the carriageway (the eastern verge being particularly generous in terms of width). The road is reasonably straight and generally provides good forward visibility. The speed limit is restricted to 40mph.
- 3.10 Vehicular access towards the village of Perton from Wrottesley Park Road is taken via two 3-arm roundabouts. The first is approximately 650m to the north of the existing site access on Wrottesley Park Road. The second is 550m south of the site.

- 3.11 Wrottesley Park Road feeds into The Parkway to the East which leads into the village. Pedestrian linkage within the existing residential road network is taken via both footways alongside local roads and off carriageway footpath links. The footways include raised kerbs, street lights, lowered tactile paving at crossings within a 30mph speed limit environment.
- 3.12 Bus: Bus stops are located to the east of the site on The Parkway serving the number 10/10A/10B service. This service is operated by National Express and passes the stop approximately every 15-30 minutes and operates between Wolverhampton and Perton via Compton. It offers access to the village centre (close to the Sainsbury's, the local library and other local facilities and amenities) and to the local schools on its way to Wolverhampton.
- 3.13 Rail: The nearest railway station to the site is Codsall Station, 3.7km to the north off Station Road. The station can be accessed via the 10B bus service which operates from the stops close to the site. Codsall Station offers services to Birmingham New Street (via Wolverhampton) every hour.





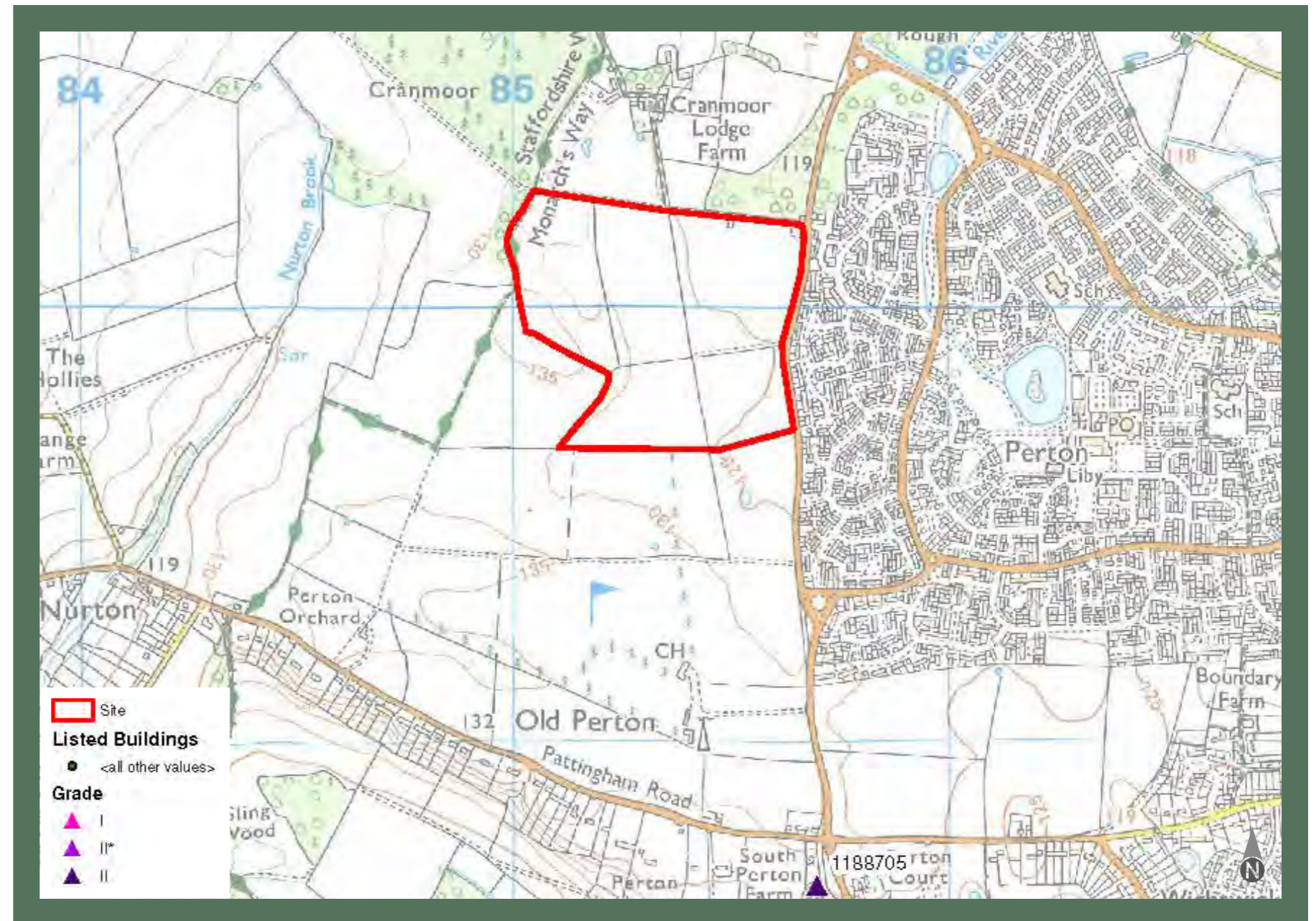
PROPOSED SITE ACCESS | NOT TO SCALE

## ACCESS

- 3.14 The nature of the generally straight alignment of the Wrottesley Park Road site frontage provide a range of feasible site access designs. These can be tailored to quantum of development, modified in the longer term as appropriate with land available as necessary.
- 3.15 Current options include: two simple priority controlled T-junctions; a priority ghost island right turn; a single ghost island right turn lane; and a roundabout. Each can be delivered on available land. The appropriate solution can be agreed with the highway authority in due course, but significant flexibility exists and one example is shown on the adjacent plan. Appropriate visibility splays and geometric designs will be delivered in accordance with prevailing design standards supported by traffic data and independent road safety audit.
- 3.16 Footway links are to be secured to the east of Wrottesley Park Road to ensure permeability and encourage sustainable trips to services and facilities available within Perton.

## HERITAGE & ARCHAEOLOGY

- 3.17 A Heritage Statement has been undertaken which identifies and considers heritage assets located within the site and within the vicinity of the site. The assessment draws together the available archaeological, historic, topographic and land-use information in order to clarify the heritage impacts and below-ground archaeological potential of the site. This study provides an assessment of the archaeological potential of the site and enables relevant parties to identify and assess the impact of the proposed allocation.
- 3.18 The assessment establishes that there are no designated heritage assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Battlefields, Registered Historic Parks or Conservation Areas) within the study site, and that development of the study site will not affect the significance of any designated asset in the surrounding area.
- 3.19 This assessment has also established that the site has a negligible potential for significant (non-agricultural) archaeological remains of all periods. The site is known to contain post-Medieval agricultural features and may also contain ploughed out structures relating to RAF Perton. These non-designated assets are not a constraint to development and will not require to be designed around.
- 3.20 There are therefore no heritage constraints to the allocation of the site for residential development.



LISTED BUILDINGS | NOT TO SCALE

## GREEN BELT

- 3.21 The Council has commissioned a Green Belt Assessment, alongside the City of Wolverhampton, Dudley, Sandwell and Walsall, (together comprising the Black Country authorities). The Study forms an important piece of evidence for the partial review of the Black Country Core Strategy (the Black Country Plan) and the strategic site allocations and individual development plans of the Black Country Authorities, as well as South Staffordshire District.
- 3.22 The Green Belt Study has two stages; the first is 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. 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, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land. 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 Vision Document.

## CONTRIBUTIONS TO GREEN BELT PURPOSES

- 3.23 The National Planning Policy Framework (NPPF) 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.
- 3.24 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Once established, Green Belts should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating

of plans (NPPF paragraph 136). This Vision Document considers the contribution that land within the site makes to the purposes and function of the Green Belt, with reference to the Council's Green Belt Study. Recommendations are also included for the release of land for development that does not harm the Green Belt and offers options for new boundaries and the enhancement of retained Green Belt land.

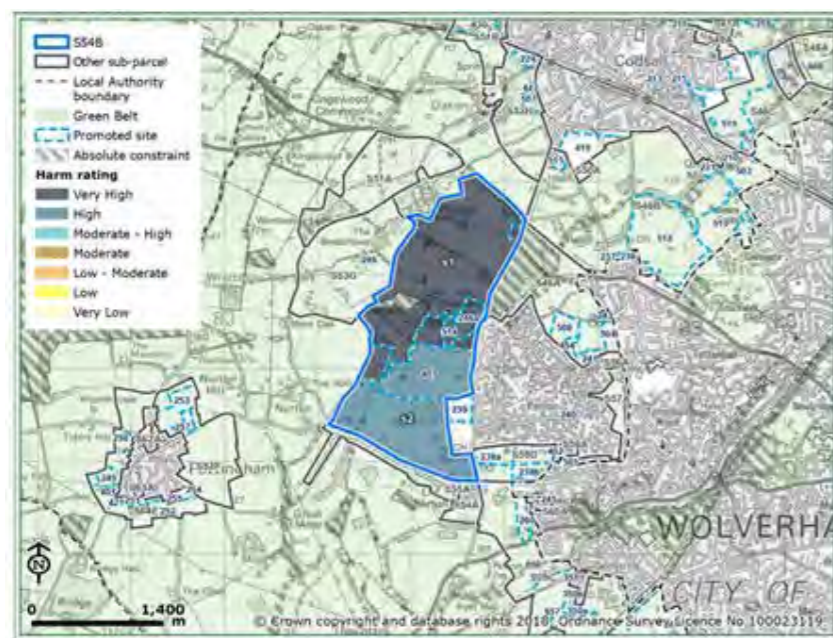
- 3.25 The Council's Green Belt Study shows Land off Wrottesley Park Road, Perton, as falling within Green Belt Sub-Parcel reference: S54B – 'Perton Park/Cranmoor/Wrottesley Park', which is identified as making the following contribution to the five purposes of the Green Belt:

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

### GREEN BELT PURPOSES SUMMARY: PARCEL S54B - PERTON PARK/CRANMOOR/WROTTESELY PARK

3.26 The Study goes on to identify that, should Green Belt Sub-Parcel ref: S54B be released for development, the resulting harm would be 'high', stating:

*“The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. This part of the sub-parcel directly adjoins the settlement of Perton. The expansion of Perton into the sub-parcel would result in a weaker Green Belt boundary than that formed by Wrottesley Park Road and tree cover along the golf course boundary that forms a boundary to land released for existing development allocations. Therefore, release of this part of the sub-parcel would constitute a limited weakening of the Green Belt. Loss of openness between Perton and Nurton/Old Perton would weaken distinction between the two, but would not increase overall harm.”*



**HARM RATING OVERVIEW OF LAND WITHIN SUB PARCEL |**  
NOT TO SCALE

3.27 Whilst the conclusions of the above assessment are noted, it remains that Green Belt Sub-Parcel ref: S54B extends significantly beyond Land off Wrottesley Park Road, Perton, which itself serves a reduced function against the five purposes of the Green Belt, as assessed below.

**To Check the Unrestricted Sprawl of Large Built-Up Areas**

3.28 Although the site relates well to the existing residential edge of Perton, development is currently contained to the east of Wrottesley Park Road, meaning development would extend further west than the current situation. The area to the west of the road however, is not absent of development, with a number of scattered farm dwellings situated to the north of the site and Perton Golf Course to the south.

3.29 The site is bounded to the north by woodland, containing the site both physically and visually within the wider landscape whilst providing a strong boundary to restrict future development. It is clear that the site has defensible boundaries on all sides and would form a natural extension to the existing urban area and as such, the site is not required to check the unrestricted sprawl of the existing built-up area.

3.30 Lastly, the provision of a country park to the western portion of the site would serve to restrict the sprawl of the built up urban area in the long-term.

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

**To Prevent Neighbouring Towns from Merging into One Another**

3.32 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 Perton and the nearest settlement of Pattingham to the west due to the distance of over 3km. As such, the development of the site would not result in the merging of neighbouring towns and would maintain the functions and separation of the Green Belt in this location. There are opportunities for the strengthening of the boundary at the interface with the wider landscape to the west which could provide increased physical and visual separation and a soft edge to development to further reinforce the edge.

3.33 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**

3.34 Whilst the site contains some characteristics of open countryside, such as an absence of built development, it remains that the site has durable defensible boundaries that are afforded clear physical enclosure from the wider Green Belt. Furthermore, due to the existing uses that surround the site, its development would prevent further encroachment into the countryside. Whilst these boundary hedgerows are in place, they are degraded and gappy in places. 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 west.

3.35 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**

- 3.36 Perton is not a historic town. The site is situated away from the Conservation Area and there are no views towards any heritage assets from within the site area. As such the removal of the site from the Green Belt would not affect the purpose of preserving the setting and special character of a historic town.
- 3.37 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**

- 3.38 Whilst it is acknowledged that all Green Belt land make 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.
- 3.39 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**

3.40 Overall, it is therefore considered that Land off Wrottesley Park Road, Perton, 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: S54B. This contribution is summarised in the table below:

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

**GREEN BELT PURPOSES SUMMARY: LAND OFF WROTTESLEY PARK, ROAD, PERTON**

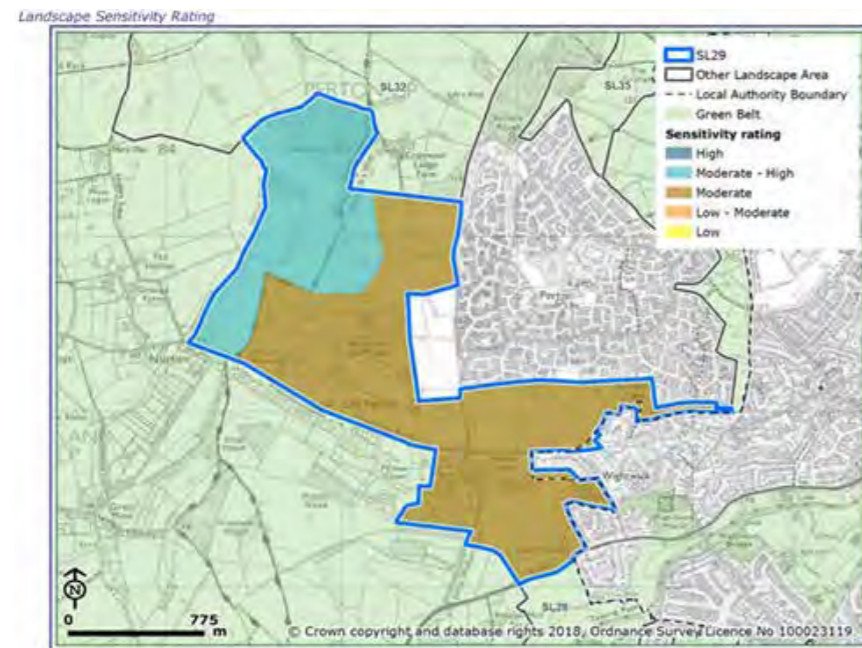
**GREEN BELT HARM**

3.41 As such, is contented that the Green Belt harm identified within the Study is also reduced, from 'high' to 'low-moderate'. It is the view of Richborough Estates that the site makes a moderate contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. The expansion of Perton into the site would result serve to facilitate the delivery of a new country park, which would result in a stronger Green Belt boundary than that formed by Wrottesley Park Road. Therefore, release of this site would constitute a limited weakening of the Green Belt.

## LANDSCAPE AND VISUAL

### LANDSCAPE CHARACTER

- 3.42 The characterisation process is a non-value judgement process; therefore, classifying landscapes into distinct areas does not suggest that one character area is more sensitive than another or valued by people more or less.
- 3.43 The landscape character appraisal process reviews the wider landscape character type at a national level, explores more detailed character features at a district/local level and analyses site-specific land use that informs local distinctiveness and sense of place. This promotion document considers the local, site-specific character features and context as identified through fieldwork. From this we can identify the relevant characteristics and important site features to retain.



LANDSCAPE SENSITIVITY RATING | NOT TO SCALE

- 3.44 South Staffordshire District Council has produced a Landscape Study (2019) which forms part of the Local Plan Review evidence base. The site falls with Landscape Parcel Reference: SL29 S1, which itself falls within the 'Settled Farmlands' Landscape Character Type. The landscape area is located west of Perton and Wightwick (Wolverhampton), and includes a narrow strip of land which separates the two settlements. The southern boundary is formed by the A454, the eastern boundary by the settlement edge, and the south western boundary by Pattingham Road. Nurton Brook forms the western boundary, and the northern boundary is formed by field boundaries. The area incorporates Perton Park Golf Course.
- 3.45 The Study concludes that the landscape is considered to have a moderate overall sensitivity to residential development. The narrow buffer of open agricultural land between the southern settlement edge of Perton and Wightwick has a particular sensitivity due to its role in preventing coalescence between the settlements.
- 3.46 It is considered that the development of the site for residential purposes represents an opportunity to strengthen existing field boundaries and provide a new country park, which would serve to define the western edge of Perton.

### SITE-SPECIFIC CONTEXT

- 3.47 The site comprises 2 individual fields separated by mature hedgerow and tree planting.
- 3.48 The northern site boundary is defined by a PRoW which runs along an access drive to a number of farmsteads to the north. Beyond this a woodland block physically and visually contains the northern boundary.
- 3.49 The site's eastern boundary is defined by Wrottesley Park Road and associated residential dwellings which back onto the site. These provide an urban influence to the site which is surrounded by countryside to the west.
- 3.50 To the south west of the site lies Perton Golf Course, which confirms the area is not unspoilt landscape and contains urbanising features. To the south, further fields adjacent to Wrottesley Park Road provide a small gap between the existing residential dwellings and Perton Golf Course.
- 3.51 The hedgerow and field boundaries provide containment and structure to the fields and are also characteristic features within the surrounding local landscape. They should be retained where possible to strengthen the locally-contained nature of the site.



## VIEWS

- **Viewpoint 1** shows the view from the PRow along the northern site boundary facing south. The lack of boundary vegetation along the southern side of the track allows for clear views across the site. In the distance, residential properties off Wrottesley Park Road are visible, showing that the frontage to the east will need to be considered to reflect the current built-edge.
- **Viewpoint 2** shows the view from the long distance route, Monarch's Way, which runs north to south in close proximity to the western site boundary. The rising topography almost entirely screens views towards the site to the east. Glimpses are possible of Perton Golf Course to the right, which is situated to the south west of the site and will allow for limited intervisibility through boundary vegetation.



- **Viewpoint 3** shows the view further along the track off Wrottesley Park Road as it approaches Monarch's Way. This view represents recreational users of the long distance footpath where users will be travelling at low speeds along pedestrian routes. Existing properties off Wrottesley Park Road are visible in the distance, identifying the site in the foreground. This highlights the requirement for enhancements to the existing western boundary vegetation to assist with filtering views from this route.

- **Viewpoint 4** shows the view facing west from the central gated access off Wrottesley Park Road. This view represents transient users of the road and local residents. The managed hedgerow allows for clear views across the site, with sparse tree planting filtering some views along the eastern boundary. Additional tree planting along the frontage will assist with providing a positive frontage along Wrottesley Park Road.



## ECOLOGY

### DESIGNATIONS

- 3.52 There are no statutory sites of nature conservation importance at an international (e.g. Special Areas of Conservation) or national (e.g. Sites of Special Scientific Interest) scale located within a 5km radius of the site.
- 3.53 There is one statutory nature conservation site within 5km designated at a local level, Smestow Valley Local Nature Reserve (LNR), a mosaic of woodland/scrub/grassland situated approximately 2.6km to the southeast of the site within the Wolverhampton City Council area.

### HABITATS

- 3.54 The site consists predominantly of arable land with a network of hedgerows and occasional hedgerow and field boundary trees. There is a low overall diversity of habitats on the site and those that it does support are common and widespread within the local landscape. Therefore, it is considered that the ecological value of the site is limited.
- 3.55 Nonetheless, it has potential to support protected species including great crested newts and bats, and also species of conservation concern such farmlands birds.

### PROTECTED SPECIES

- 3.56 The site offers potential for protected species, notably: bats, badger, breeding birds, wintering birds and reptiles. Dedicated surveys for these species will be undertaken to identify their presence and inform the scale of any required mitigation.
- 3.57 It is anticipated that the site provides significant scope to deliver any required mitigation in respect of protected species through the provision of the significant Green Infrastructure proposals within the site.

### BIODIVERSITY PROTECTION & ENHANCEMENT

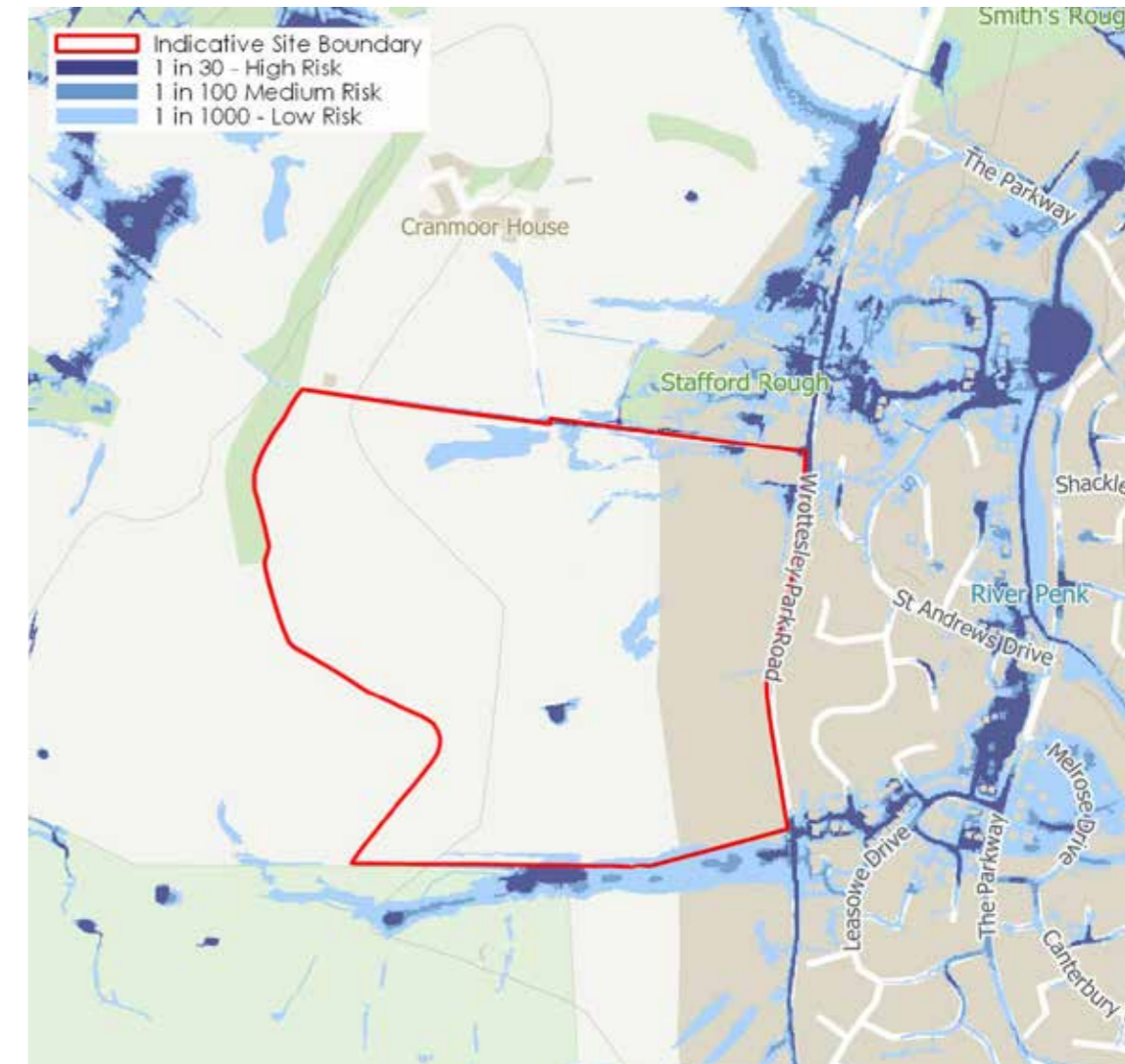
- 3.58 The site affords considerable opportunities for biodiversity enhancement through habitat creation through the provision of a significant area of open space both within the development area and through an opportunity to create a new Country Park. The creation of new habitats should be designed to contribute towards targets set within the UK and Staffordshire Biodiversity Action Plan.
- 3.59 The scheme has the opportunity to contribute to the targets for the following BAP habitats:
- Lowland Wood Pasture and Parkland – within a proposed Country Park and through retention and management of the existing mature trees and the planting of locally native broadleaf trees and shrubs. This would also contribute to the parkland landscape character of the Sandstone Estatelands;
  - Lowland acid grassland – the site is underlain by sandstone and the free-draining slope within the western section of the site represents a possible location for acid grassland creation. This is a rapidly declining habitat type of significant biodiversity importance and its potential on the site should be investigated by soil analysis to determine feasibility. If achievable, this is likely to require stripping of the O-horizon to remove the fertile topsoil rich in weedseeds to expose the underlying sandy substrate;

- Ponds and Lakes –Sustainable Drainage System (SuDS) features within the site could be designed to maximise biodiversity value. SuDS have the advantage of providing flood amelioration, visual amenity and biodiversity and therefore are a good example of multi-functional green infrastructure;
- Reedbeds – can be created around the margins of the ponds, lakes and swales by encouraging shallow areas of periodically inundated land. Reedbeds (and other tall emergent aquatic vegetation communities such as rushes and sedges) can be encouraged to establish through natural colonisation or preferably by introducing plants through coir mats and/or plug planting;
- Wildflower meadows – could be created within the areas of grassland and open space. In order to maximise their botanical value, a variety of seed mixtures and cutting regimes should be employed. Meadows could be combined with short mown amenity grass areas by creating informal paths and larger areas for recreation; and
- Biodiverse Architecture – consideration should be given to constructing the buildings to incorporate features on their exterior that can be used by roosting bats and nesting birds.

## FLOOD RISK & DRAINAGE

- 3.60 According to the Environment Agency Flood Map for Planning, the application site is located entirely within Flood Zone 1 (Low Probability), which is land defined as having less than a 1 in 1000 annual probability of river or sea flooding. The watercourse is the River Penk (an ordinary watercourse), which is located approximately 275m east of the site.
- 3.61 The existing site is entirely greenfield in nature, with minor area of hardstanding to the north eastern corner. LiDAR data suggests that the site is peaked within the central region, which falls away to both the eastern and western boundaries. The overall lowest point of the site is located to the within the north eastern corner.
- 3.62 An appropriate Surface Water Management Strategy which complies with the latest local and national advice will be implemented on the site to attenuate the increase in surface water runoff caused by development. As a first option, infiltration should be considered for the disposal of surface water due to the expected favourable ground conditions of Sandstone bedrock geology with superficial deposits of sand and clay. It is therefore strongly recommended that infiltration testing is carried out at the earliest opportunity, to confirm if drainage via soakaway is achievable and ascertain a suitable rate of infiltration.
- 3.63 In the event that infiltration is not viable, alternative surface water outfall locations should be investigated. A network of drainage ditches appears to be present beyond the northern site boundary, to the north of the private access road. However, any connection would be subject to proving onward connectivity and existing condition, through survey works.
- 3.64 Furthermore, any connections would be reliant on agreements to connect through 3rd party land.
- 3.65 There are no public surface water or combined sewers located within the adjacent Wrottesley Park Road. Surface water sewers are present within the neighbouring residential development to the east, which discharge directly to the River Penk.

- 3.66 Any potential connections to this surface water network would require crossing 3rd party land, subject to the necessary agreements. A potential connection may be viable to the asset within Hoylake Road, through an undeveloped plot. However, this would remain subject to further investigation into the existing network invert levels, and confirmation of land ownership. Additionally, the network at this location is likely to be of small diameter and would be subject to capacity assessment by Severn Trent Water.
- 3.67 Owing to the constraints present to connect to surrounding drainage ditches, minor watercourses and public surface water sewers, drainage via infiltration remains the preferred method of surface water disposal.
- 3.68 The rate at which the runoff is discharged into either an existing drainage ditch network or existing sewer network would be restricted to the equivalent greenfield runoff rate, preventing an increase in flows leaving the site and thus ensuring that the development does not have a detrimental impact upon flood risk elsewhere.
- 3.69 Through the application of Sustainable Urban Drainage Systems (SuDS), the additional surface water will be stored within the site and subjected to multiple stages of treatment to guarantee that the water quality in the wider drainage network is protected. Wherever possible SuDS features will be above ground to enhance the aesthetic amenity of the development and provide valuable habitats for the local wildlife.
- 3.70 The attenuation provided will be appropriately sized to include an allowance for climate change. Example SuDS features that will be incorporated into the development wherever possible include attenuation basins, permeable paving and swales.
- 3.71 Principles within the previous concept plan iteration should be maintained, specifically the allocation of space for a 'blue corridor' which serves the proposed attenuation pond.



**SURFACE WATER FLOODING | NOT TO SCALE**



INDICATIVE SURFACE WATER DRAINAGE APPRAISAL | NOT TO SCALE







4

VISION



# VISION

## VISION

- To produce a living environment of the highest standard, with a clear and recognisable identity which reflects the local vernacular of Perton and contextual views;
- To provide a sustainable development comprising a range of houses, including family homes and smaller properties and significant new areas of publicly accessible open space, including a new Country Park to serve the village of Perton;
- To create a safe, attractive and secure neighbourhood, streets and places which promote social interaction which will afford access and movement priority to pedestrians and cyclists, including connectivity with the existing network of footpaths to local services and facilities;
- To provide a locally inspired and meaningful new green space network which enhances the character of the site and the natural and historic environment and creates a robust and enduring new Green Belt boundary; and
- To create a development that will enhance the attraction of Perton as a place to live and work, incorporating valued aspects of local character, heritage, landscape, visual amenity and biodiversity.









# 5

# INDICATIVE MASTERPLAN & DESIGN PRINCIPLES

## KEY ELEMENTS OF THE PROPOSAL

- Delivery of up to 300 dwellings to include market and affordable homes and a mix of property types aligned to local needs;
- Strong Green Belt boundary provided utilising existing trees and hedgerows;
- New residential links provided to wider residential areas and Perton Centre to maximise connectivity and encourage sustainable trips;
- Provision of a network of green links and corridors and provision of equipped play;
- Delivery of a new Country Park to serve Perton that connects into the Staffordshire Way;
- Retention of existing field pattern.
- Provision of a new visitor centre/café ancillary to the Country Park.
- Increased biodiversity and wildlife habitats, including incorporation of Sustainable Drainage Systems (SuDS).
- Creation of new, enduring Green Belt boundary and provide opportunity to provide recreational access, enhanced landscapes and increased biodiversity



INDICATIVE MASTERPLAN | NOT TO SCALE





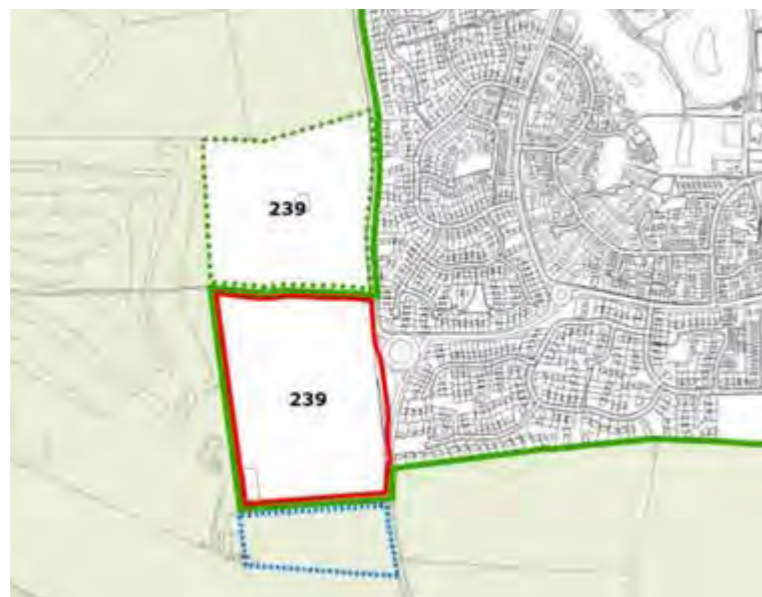




# 6

## WEST PERTON

- 6.1 The adopted Local Plan for South Staffordshire District comprises the Core Strategy (2012) and the Site Allocations Document (2018). The Site Allocations Document removed 16.6 hectares of land from the Green Belt adjacent to Perton (site ref: 239), with 9.1 hectares allocated for residential development (minimum of 163 dwellings), with an additional 7.5 hectares safeguarded for future development needs (an additional minimum of 112 dwellings). An extract of the adopted Site Allocations Document proposals Map Inset for Perton is included below.
- 6.2 The land under the control of Richborough Estates is located immediately to the north of the safeguarded land west of Wrottesley Park Road. The release of this land from the Green Belt and its allocation for residential development represents an opportunity to deliver a comprehensive and connected new community west of Perton. Discussions are ongoing between Richborough Estates and neighbouring sites to deliver this vision.
- 6.3 The allocation of the land for residential development offers the opportunity for the delivery of a country park (see Chapter 8 of this document) as well as improving and enhancing pedestrian, cycle and green space connectivity within the wider area.



WIDER AREA MASTERPLAN | NOT TO SCALE









# DELIVERABILITY & KEY BENEFITS

## DELIVERABILITY

- The site is a suitable area for housing as there are no physical, technical or environmental constraints preventing its development.
- The Framework requires Local Planning Authorities to maintain delivery of housing land to meet their housing targets. To be considered deliverable, a site should be:
- **Available.** A site is considered available when there is confidence that there are no legal or ownership problems.
- **Suitable.** A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities; and
- **Achievable.** A site is considered achievable for development where there is a reasonable prospect that housing will be delivered on the site within five years, and in particular, development of the site is viable.

## AVAILABLE

- 7.1 Richborough Estates has a legal agreement in place with the landowners and are in a position to progress with the promotion of the site for residential led development.
- 7.2 If the site is to be successfully allocated for development and removed from the Green Belt, Richborough Estates would seek to develop the site immediately, which would contribute considerably to the District's housing supply.

## SUITABLE

- 7.3 The site is suitable for residential development for the following reasons:
  - It offers a suitable location for development and can be brought forward immediately following an allocation;
  - It would form a natural extension to the established area of Perton;

## ACHIEVABLE

- 7.4 The site has been fully assessed in terms of its environmental considerations and it has been demonstrated that the delivery of the site is achievable and deliverable, and a team of technical consultants has been appointed to support the delivery of this site moving forward. Where technical constraints are identified, Richborough Estates will provide appropriate mitigation and invest in the site to ensure delivery.
- 7.5 Richborough Estates has reviewed the economic viability of the proposals in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Perton. These considerations have been analysed alongside cost factors associated with the site, including site preparation costs and site constraints. Richborough Estates can therefore confirm that the site is economically viable and therefore achievable.

## KEY BENEFITS

- 7.6 Development of the site will contribute to building a strong, responsive and competitive economy. In particular, the delivery of new homes at the site will bring economic benefits during the construction, operational and commercial stages.
- 7.7 The proposal would assist in the delivery of supporting infrastructure, including a new Country Park to serve new and existing residents of Perton.
- 7.8 Overall, the provision of much needed additional open market and affordable homes in the District will contribute to building a strong, responsive and competitive economy in line with the objectives of the NPPF.







8

COUNTRY PARK



- Key**
-  Application site boundary
  -  Open space
  -  Indicative surface water attenuation basin
  -  Existing (retained) trees & hedgerow
  -  Indicative proposed planting
  -  Potential for equipped play/LEAP
  -  Natural play "station"
  -  Existing Public Right of Way
  -  Proposed footpath connection improvements to Parkway Roundabout
  -  Proposed hard surfaced pedestrian/cycle link
  -  Proposed mown path
  -  Indicative development cell

INDICATIVE MASTERPLAN | NOT TO SCALE



# COUNTRY PARK

- 8.1 As identified previously within this Vision Document, the release of Land off Wrottesley Park Road for residential development provides the opportunity to facilitate the delivery of a new country park to the western edge of the site, to serve both existing and future residents of Perton and the surrounding area.
- 8.2 The delivery of Perton Country Park has previously been identified as an emerging infrastructure opportunity within the Council's Infrastructure Delivery Plan (2019 version). This opportunity is reflective of Perton's status as a sustainable Tier 2 settlement, as well as site-specific green infrastructure characteristics which lend the site to the delivery of a park.
- 8.3 A country park delivered at Land off Wrottesley Park Road would remain in the Green Belt and would serve as an enduring defensible boundary in the long-term, beyond the plan period. In particular, the country park would provide an opportunity to give residents access to the wider Green Belt and a significant area of green infrastructure with potential to link to the wider public Right of Way network beyond.
- 8.4 A country park would be capable of delivering the following facilities and benefits, as shown on the Illustrative Layout shown adjacent.
- Café/visitor centre
  - Community orchard
  - Informal sports area
  - Equipped play area
  - Natural play areas
  - Picnic area
  - Wildflower meadows
  - Heathland areas
  - Formal and informal walking routes
  - Connectivity to wider public right of way network
- 8.5 The design of the country park will continue to evolve through discussions with South Staffordshire District Council and other relevant parties as the site continues to be promoted through the process of the Local Plan Review.









# SUMMARY AND CONCLUSIONS

9.1 This Promotional Document demonstrates that there is a need to accommodate an increased level of housing within the District to meet future housing needs and there are exceptional circumstances to justify the need for Green Belt release to accommodate this as part of the Local Plan review.

9.2 This site represents a well located and exceptionally sustainable site, which would deliver approximately 315 new market and affordable dwellings to assist in meeting the future housing requirement of South Staffordshire District without undermining the purposes of the Green Belt or adversely impacting upon the environment.

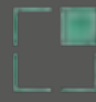
9.3 In summary, this Promotional Document has illustrated that the site would:

- 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;
- Deliver a new Country Park which would offer significant biodiversity benefits and provide recreational access to the countryside;
- Provide the potential to deliver new community facilities, including a visitor centre and café linked to the Country Park;
- Be sustainably located on the edge of Perton and within proximity of a wide range of services and facilities, with new pedestrian/cycle links created to the wider residential area and Perton Centre;
- Accommodate a high-quality residential development with safe, attractive and secure neighbourhood, streets and places which promote social interaction which will afford access and movement priority to pedestrians and cyclists, including connectivity with the existing network of footpaths to local services and facilities;
- Provide a locally inspired and meaningful new green space network which enhances the character of the site and the natural and historic environment and creates a robust and enduring new Green Belt boundary; and
- Create a development that will enhance the attraction of Perton as a place to live and work, incorporating valued aspects of local character, heritage, landscape, visual amenity and biodiversity.





DESIGN



ENVIRONMENT



PLANNING



ECONOMICS



HERITAGE

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DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE



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