

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW – PREFERRED OPTIONS CONSULTATION

Springhill Lane, Wolverhampton

Prepared for: Jay Farm Homes and Lawnswood Homes

SLR Ref: 416.07696.00001
Version No: FINAL
December 2021

SLR 

BASIS OF REPORT

This document has been prepared by SLR Consulting Limited with reasonable skill, care and diligence, and taking account of the manpower, timescales and resources devoted to it by agreement with Jay Farm Homes and Lawnswood Homes (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.

CONTENTS

1.0	INTRODUCTION	1
2.0	PREFERRED OPTIONS CONSULTATION QUESTIONS	3
3.0	PLANNING CONSIDERATIONS	6
4.0	GREENBELT CONSIDERATIONS	11
5.0	ECOLOGY CONSIDERATIONS	13
6.0	SOCIO-ECONOMIC CONSIDERATIONS	15
7.0	SUMMARY AND CLOSURE	16

DOCUMENT REFERENCES

APPENDICES

Appendix 1: Site Promotion Document – Springhill Lane, Wolverhampton

Appendix 2: Green Belt Criteria Comparison Report

Appendix 3: Education Capacity Overview Statement

1.0 Introduction

SLR Consulting Limited has been instructed by Jay Farm Homes and Lawnswood Homes to prepare representations to the South Staffordshire Council Local Plan Review, Preferred Options Consultation process in support of their site at Springhill Lane, Wolverhampton.

These representations have been formed through a review of the published information available on the Local Plan Review webpage of the South Staffordshire Council website and the associated consultation portal. This submission seeks to provide answers to each of the questions posed within the consultation portal, whilst further detailed comments are raised with regard to the overarching content of the published Preferred Options document and associated evidence base.

This document contains the following sections:

- Section 1.0 – Introduction (including Background to Preferred Options Consultation);
- Section 2.0 – Preferred Options Consultation Questions;
- Section 3.0 – Planning Considerations;
- Section 4.0 – Greenbelt Considerations;
- Section 5.0 – Ecology Considerations;
- Section 6.0 – Socio-Economic Considerations; and
- Section 7.0 – Summary and Closure.

These representations contend that site 494a performs/scores better than site 582, whilst site 494b is considered to score comparably to site 582. It is therefore requested that the Council duly consider the points raised herein with respect to the assessment of parcels 494a and 494b in regard to the site allocations identified within the Preferred Options consultation. Indeed, the Council should consider:

- Whether site 494a should be allocated in addition to site 582;
- Whether sites 494a and 494b are a more appropriate allocation to that proposed at site 582; or
- Whether site 494a and/or site 494b should be safeguarded for potential future allocation within subsequent local plan reviews.

1.1 Background to Preferred Options Consultation

Jay Farm Homes and Lawnswood Homes has promoted their landholdings at Springhill Lane, Wolverhampton under the various stages of the South Staffordshire Local Plan Review process, including submitting representations to:

- Sites Allocations Document Main Modifications – March 2018;
- Call for Sites – October 2018;
- Issues and Options Consultation – November 2018; and
- Spatial Housing Strategy & Infrastructure Delivery – December 2019.

As part of these representations, Jay Farm Homes and Lawnswood Homes have been broadly supportive of the strategy identified for accommodating housing need within the authority area, including accommodating some of the unmet housing need from the adjoining Black Country authorities and allocating sites along the urban

edge of Wolverhampton where appropriate.

Through this process, Jay Farm Homes and Lawnswood Homes has identified that both their landholdings (site 494a) and the adjoining land within County Council ownership (site 494b) should be considered appropriate for development. However, should the authority deem it appropriate, then a smaller site release of their land alone could also be brought forward to achieve the development of up to 120 new homes on the urban edge of Wolverhampton in a highly sustainable location. In undertaking this promotion, a Site Promotion Document was prepared and submitted identifying the constraints and opportunities of the wider landholding (494a and 494b), and demonstrated how development could be realised at this site. This document was updated through the Local Plan Review process as further technical information became available.

A copy of the latest Site Promotion Document is appended to these representations for your reference (Appendix 1) and it is requested that the content be reviewed in full when considering the comments and representations contained herein.

2.0 Preferred Options Consultation Questions

This section of the representations seeks to provide direct answers to the questions detailed within the Preferred Options November 2021 online consultation document¹. Each question has been detailed, in turn, with the comments and answers provided on behalf of Jay Farm Homes and Lawnswood Homes.

2.1 Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan?

NO - Whilst the list of evidence base documents is broadly appropriate to inform the Local Plan Review, there are a number of elements contained therein which are incorrect or inaccurate. As such, the use of the current evidence base is inappropriate without such errors being corrected and duly considered in full. A range of comments are set out below which relate directly or in-part to the following evidence base documents and the proposed site allocations:

- Rural Services and Facilities Audit 2021;
- Black Country and South Staffordshire Green Belt Study and Landscape Sensitivity Study 2019 (also referred to as the Green Belt Review 2019 and Landscape Study 2019);
- Strategic Housing & Economic Land Availability Assessment 2021;
- Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA) 2021;
- Strategic Housing Market Assessment (SHMA) 2021;
- Housing Site Selection Topic Paper 2021; and
- Duty to Cooperate Topic Paper 2021.

2.2 Question 2a: Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP?

YES – The correct infrastructure and mechanisms to ensure it is delivered has been identified within the IDP.

2.3 Question 2b: Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?

NO – There is no other elements of infrastructure which need to be considered at this stage given that it will be based on the individual site allocations and their associated constraints and opportunities.

2.4 Question 3a: Have the correct vision and strategic objectives been identified?

YES – The correct vision and strategic objectives have been identified but our client does not believe this is accurately reflected within the proposed site allocations contained within the Preferred Options consultation documents.

¹ [South Staffordshire - Preferred Options November 2021 \(oc2.uk\)](https://oc2.uk)

2.5 Question 3b: Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives?

NO – insufficient sites have been identified along the western edge of Wolverhampton and Dudley to achieve the identified Strategic Objectives. Furthermore, in accordance with the National Planning Policy Framework, the Council should be seeking to safeguard further sites to meet potential development needs now and beyond the current plan period.

2.6 Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside?

NO – Policy DS1 (Green Belt); the alterations to the Green Belt boundary should be amended to both accommodate the proposed site allocations as well as safeguarding further sites to meet potential development needs now and beyond the current plan period. This approach would accord with National Planning Policy as outlined below.

Our client raises no comment with regard to proposed Policy DS2 (Open Countryside).

2.7 Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038?

NO – the proposed Spatial Strategy within the Preferred Options consultation does not reflect that which was identified within Option G of the previous Spatial Housing Strategy & Infrastructure Delivery consultation. Option G previously identified that 8.5% of the housing need (c. 750 units) should be provided along the western edge of the Black Country urban areas (Wolverhampton and Dudley).

Whilst there is a reduced unmet need from the adjoining Dudley area, this reduction is not reflective of the unmet housing needs associated with, and allocations needed to support, the Wolverhampton authority area. Further sites should either be allocated or safeguarded along the western edge of the Wolverhampton urban area to ensure housing needs are met now and beyond the current plan period.

2.8 Question 6: Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement?

NO COMMENT

2.9 Question 7a: Do you support the proposed strategic housing allocations in policies SA1-SA4?

YES – However, in accordance with the Council's own evidence base, further smaller non-strategic sites should be identified for allocation and/or safeguarding along the urban edge of Wolverhampton to support housing needs now and beyond the plan period.

2.10 Question 7b: Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?

YES – no further comment.

2.11 Question 8: Do you support the proposed housing allocations in Policy SA5?

NO – The Council has failed to identify sufficient housing sites to the west of Wolverhampton and Dudley to achieve the Housing Spatial Strategy previously identified. At present the Preferred Options currently identifies only site 582 on the western edge of Wolverhampton and none along the edge of Dudley. The Spatial Strategy sought to provide approximately 8.5% of the housing need (c. 750 units) within this area of search and, as such, further sites should either be allocated, or at a minimum safeguarded, along this urban edge.

Further comments on the evidence base are provided below.

2.12 Question 9a: Do you support the proposed pitch allocations in Policy SA6?

NO COMMENT

2.13 Question 9b: Is there another option for meeting our gypsy and traveller needs, including any alternative site suggestions that could be considered?

NO COMMENT

2.14 Question 10: Do you support the proposed allocation in Policy SA7?

NO COMMENT

2.15 Question 11: Do you agree with the proposed policy approaches set out in Chapter 6?

NO COMMENT

2.16 Question 12a: It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree these are strategic policies?

NO COMMENT

2.17 Question 12b: Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies?

NO COMMENT

3.0 Planning Considerations

3.1 Rural Services and Facilities Audit 2021

As identified within the methodology for the Rural Services and Facilities Audit, the evidence base does not currently consider the suitability of certain settlements for further growth. Indeed, it should be duly recognised that this study only considers the presence, and not capacity, of services and facilities within existing settlements within South Staffordshire Council area.

The study also does not consider the ability of the urban areas adjoining South Staffordshire authority area to provide the necessary facilities, services and employment to support further housing growth in these areas. Further consideration should be given to the suitability of broad growth areas and potential development sites adjoining the urban areas of Wolverhampton and Dudley in terms of access to facilities, services and employment.

Again, it is important to recognise that the Greater Birmingham HMA Growth Study clearly identifies that sites adjacent to the urban areas (as identified under 'Proportional Dispersal') have *"Typically lower requirements for strategic infrastructure with consequently less requirements for public sector funding"* and that only *"Some contribution to delivering social infrastructure and open space depending on scale and existing local provision"* would be required. As evidenced within the Springhill Lane Site Promotion Document, the local area of Springhill has sufficient strategic and social infrastructure to support the delivery of our Client's site.

As identified by Paragraph 3.23 of the Audit, consideration of education facilities within the adjacent urban areas has been undertaken for the villages of Perton and Huntington. However, no reference has been made to the consideration of education facilities for other housing located adjacent to these urban areas which are not located within villages (i.e. housing along Springhill Lane that falls within the South Staffordshire District Council administrative area) and for potential housing sites being brought forward in these locations.

3.2 Black Country and South Staffordshire Green Belt Study and Landscape Sensitivity Study 2019 (also referred to as the Green Belt Review 2019 and Landscape Study 2019)

It is agreed that the Green Belt Study should be utilised as key evidence to advise toward the release of Green Belt land in accordance with national level policy and guidance. However, the Green Belt Study should not be the only evidence utilised in identifying which sites should be released given that there are a range of other criteria which need to be considered to ensure a sustainable release of land as part of the Local Plan Review (and any safeguarding of land beyond this). There are also elements of the evidence contained within the Green Belt Study which our client wishes to raise comment.

Furthermore, our Client would emphasise that there is a clear need for the authority to consider releasing additional green belt land beyond that being considered for housing allocations within the Preferred Options Consultation. It should be noted that Paragraph 139 requires that *"When defining Green Belt boundaries, plans should:*

- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;*
- b) not include land which it is unnecessary to keep permanently open;*
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*

- d) *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) ***be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and***
- f) *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” (emphasis added)*

In supporting the proposed approach identified within the Spatial Housing Strategy, the Council should be seeking to allocate, or at least safeguard, multiple mid-size allocations along the edge of Wolverhampton rather than the singular site currently identified (site 582). This would allow for a more proportionate and sustainable approach to site selection whilst also allowing for a fallback position should a housing site not be realised/delivered. As such, it is duly requested that the Council consider releasing and/or safeguarding further land adjacent to the urban edge of Wolverhampton to meet potential development needs now and beyond the current plan period.

Further specific comments regarding the content and methodology of the Green Belt Study and Landscape Sensitivity Assessment are provided within Section 4 of these representations.

3.3 Strategic Housing & Economic Land Availability Assessment 2021

The use of the Strategic Housing and Employment Land Availability Assessment (SHELAA) 2018 to meet a level of housing growth within a broad location is appropriate provided this is compatible with the strategic approach pursued in the relevant Spatial Option.

It is noted that the SHELAA has correctly considered the potential release of sites 494a and 494b independently but that the estimation of housing delivery at the two sites is conservative. General assumptions have been utilised to generate a net developable area and development density. The use of a net developable area ratio of 60% for sites above 2 hectares is disproportionately favourable to the release of larger sites rather than those which are only just above this size threshold; it should be emphasised that the Council should be seeking to identify a range of site sizes to meet their housing need, and that smaller sites are likely to achieve a higher net developable area given the lower levels of infrastructure and open/play space provision required.

As detailed within the Site Promotion Document, site 494a could deliver up to 120 dwellings, whilst site 494a and 494b combined could deliver up to 450 dwellings. These estimations are based on the use of a density of 37 dwellings per hectare and duly account for all necessary infrastructure (roads, SuDS etc.) and open/play space provision that would be required within the site(s).

Furthermore, given that the site access improvements have already taken place on site to support the recently opened nursery school, the SHELAA fails to appreciate that site 494a could be delivered within a shorter timescale than that currently identified. Subject to planning, it is anticipated that site 494a could be delivered within the 2023-2028 timescale (rather than the 2028-2033 timescale currently identified).

3.4 Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA)

A review of the Sustainability Appraisal has been undertaken given that this was the predominant evidence base document which supports the proposed allocations contained within the Preferred Options consultation. As can be noted from the tables below Site 494a and 494b scored a total of -9 against the pre-mitigation scoring matrix, whilst Site 582 scored a total of -7 against the pre-mitigation scoring matrix. As can be noted, the scores are

relatively comparable with the exception of Climate Change Adaptation, Biodiversity and Geodiversity, Cultural Heritage and Education.

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
494a	+/-	-	-	--	-	-	+	-	0	-	-	-
494b	+/-	-	-	--	-	-	+	-	0	-	-	-
582	+/-	--	+/-	--	-	-	+	-	-	-	++	-

Upon review of the supporting text contained within Section B.17 of the report (pages B148 – B157), it is clear that there has been some misinterpretation of the constraints and opportunities associated with sites 494a, 494b and 582. We have touched on each of these, in turn, within the latter sections of these representations. Nevertheless, sites 494a and 494b should be reviewed and their scoring matrix updated to reflect the findings contained herein.

For example, it is assumed that the education based pre-mitigation scoring for site 582 is based on the developers intentions to provide an element of primary school provision on site. Whilst this is beneficial to the overall infrastructure in the area going forward, this score is actually a ‘post mitigation’ consideration and should be duly adjusted to account for the levels of education capacity in the vicinity of the site at this point in time (i.e. pre-mitigation). Furthermore, no consideration has been given to the presence of a Nursery School on the Springhill Lane site within their education score.

Upon review of this scoring, it is contended that site 494a will score better than site 582, whilst site 494b would score comparable to site 582. Furthermore, a more detailed Green Belt Criteria Comparison of the site’s is also provided below. On this basis, it is duly requested that the Council re-consider their proposed allocations along the western edge of Wolverhampton to include site 494a; whether this is in place of, or in combination with, site 582 would be for the Council to determine.

Furthermore, with regard to the post-mitigation scoring matrix, the SA is not clear as to the reasons and justification for the alterations to the scoring in comparison to the pre-mitigation matrix. Whilst mitigation is standard practice, full and robust justification should be provided as to how these alternate scores have been achieved.

Please see Sections 4-5 of these representations below for further comments regarding the content/scoring contained within the SA.

3.5 Strategic Housing Market Assessment (SHMA) 2021

As identified by the SHMA, “Wolverhampton was the most common place of work for residents of South Staffordshire” (paragraph 1.15) and that this equates to 23.9% of the working age residents within South Staffordshire administrative area. Furthermore, “Wolverhampton is the authority to which people from South Staffordshire most commonly moved to in the year up to June 2018” (paragraph 1.18) and “Wolverhampton is the authority people that moved into South Staffordshire most commonly came from in the year up to June 2018”

(paragraph 1.21). As such, the SHMA clearly identifies the strong linkages between these two adjoining authority areas and the pressures placed on a commuting population.

Indeed, paragraph 1.27 concludes that *“The analysis of South Staffordshire and its neighbouring authorities presented above suggests that the most established linkages are those with the urban neighbours immediately to the east of the District – Wolverhampton and Dudley reflecting the pattern of migration flows around the Black Country to move radially outwards. It is interesting to note that the flows between South Staffordshire and Wolverhampton are strong both ways. The analysis of the house market suggests that South Staffordshire does not share many characteristics with the authorities with which it shares the greatest migration flows, but is most similar to the other authorities which are principally rural in nature – Shropshire and Stafford. South Staffordshire is therefore fairly unique, closely linked to the Black Country authorities but containing a housing market distinct to this area”*.

On this basis, this broadly supported the Council’s previously identified strategy of proportionate dispersal of new housing sites along the urban edge of Wolverhampton within the Spatial Housing Strategy & Infrastructure Delivery consultation. However, the Preferred Options has failed to bring forward sufficient housing sites to meet this intended strategy and further sites should either be allocated, or at least safeguarded, along this urban edge for the plan period and beyond.

In addition to the above, it is noted that the SHMA identifies that there is a planned total of 9,068 new dwellings to be delivered in South Staffordshire over the twenty year plan period (paragraph 4.17). However, this is not currently reflected within the Preferred Options document which only identifies allocations for up to 8,881 dwellings between 2018 and 2038. On this basis, it is questioned whether further additional site allocations should be identified to achieve the level of housing need identified within the SHMA (a shortfall of c. 187 units). The Springhill Lane site would be of the correct size and scale to meet this requirement.

3.6 Housing Site Selection Topic Paper 2021

With regard to the consideration of site 582 within the Housing Site Selection Topic Paper (paragraphs 5.25.6 – 5.25.9), this appears to be heavily skewed by the Council’s consideration of its Green Belt, Landscape Capacity and proximity to existing educational facilities. These representations set out a range of points regarding the consideration of sites 494a and 494b, as well as site 582, against these topics and clearly identifies that the sites perform equally or better than site 582 in this regard.

Indeed, it is noted that the justification for allocating site 582 in preference to other sites (paragraph 5.25.8) remains entirely silent on the consideration of sites 494a and 494b despite their relatively comparable scoring within the Sustainability Appraisal. However, a review has been undertaken of the Site Proformas within Appendix 3 of the Topic Paper to consider this in more detail.

It is noted that the Site Proformas for Sites 494a and 494b (Appendix 3) are identical and have failed to duly recognise that the sites could be released independently from one another. To re-emphasise, site 494a could accommodate up to 120 dwellings, whilst sites 494a and 494b combined could accommodate up to 450 dwellings.

In this regard, it is noted that the County Highways raise concerns that access to the sites would not be achievable. As can be noted from the submitted Site Promotion Document, site 494a already benefits from two consented (and now implemented) site access points designed to accommodate up to 200 residential dwellings per access (application ref. 16/01078/FUL). As such, the site already benefits from suitable site access points which would allow for the immediate release of site 494a for housing development. The proforma for site 494a should be amended to reflect this position and the Council duly re-consider this smaller parcel for allocation.

It should be duly noted that sites 494a and 494b benefit from significant sustainability advantages over site 582 which is currently identified for allocation; the site(s) are located closer to existing public transport, shops and services, whilst already benefiting from an established public footpath network.

It is noted that site 582 is proposed to be allocated to deliver a minimum of 390 dwellings; however, the site proforma clearly identifies that it will be necessary to accommodate significant areas of the site for site access improvements, surface water drainage (SuDS) and an offset to the adjoining Local Wildlife Site. It is understood that the SHELAA has estimated that this would require approximately 7 hectares of the site to be utilised for these elements. Furthermore, it is noted that the site proforma stays silent on the presence of TPOs within site 582. On this basis, utilising a density of 37 dwellings per hectare and taking into consideration the points raised above, internal site infrastructure (roads etc.), the level of open space and play space provision that would be required, it is considered that the site is unlikely to deliver a minimum of 390 dwellings.

3.7 Duty to Cooperate Topic Paper 2021

Whilst work is still ongoing to with regard to the duty to cooperate, it is noted that no formal Statement of Common Ground has been achieved between the neighbouring authorities at this point in time. As such, concern must be raised that the authority would be acting prematurely in progressing with any form submission of the Local Plan Review for examination without this formally being in place. As detailed within Appendix A of the Topic Paper, there remain to be a number of key topics on which no formal consensus has been reached with adjoining authorities.

As outlined within our previous representations to the local plan review process, our Client broadly agree with the requirements for accommodating unmet housing need from adjoining authorities (Topic Paper paragraphs 5.2 – 5.6). However, in supporting the proposed approach identified within the Spatial Housing Strategy, the Council should be seeking to allocate, or at least safeguard, multiple mid-size allocations along the edge of Wolverhampton rather than the singular site currently identified (site 582). This would allow for a more proportionate and sustainable approach to site selection whilst also allowing for a fallback position should a housing site not be realised/delivered. As such, it is duly requested that the Council consider releasing and/or safeguarding further land adjacent to the urban edge of Wolverhampton to meet potential development needs now and beyond the current plan period.

It is noted that Paragraph 5.13 of the Duty to Cooperate Topic Paper identifies that the Council will actively engage with both Staffordshire County Council and the adjoining education authority to ensure proposed housing growth is coordinated and that there is sufficient education infrastructure to support these. Whilst it is appreciated that such cross boundary assumptions are to be detailed within any forthcoming Statement of Common Ground, it is not apparent that the Council has duly considered education capacity in detail within their site assessment or Sustainability Appraisal process. This is considered further within Section 6 of these representations.

4.0 Greenbelt Considerations

A Green Belt Criteria Comparison Report has been prepared by SLR considering the criteria and assessments contained within the Preferred Options Document and evidence base, including the Sustainability Appraisal (SA), individual site assessments, landscape sensitivity and Green Belt studies. This document primarily concentrates on the consideration of the promoted Springhill Lane Site (Site 494a and 494b) and the site currently preferred for allocation within the Preferred Options Document at land north of Langley Road (Site 582). This document is provided within Appendix 2 for your reference and forms part of these representations.

The report identifies that the overall contribution to Green Belt Purposes is identified as the same for both the 'Promoted' and 'Preferred' sites with Green Belt Purposes 1 (urban sprawl), 3 (encroachment) and 5 (assisting urban regeneration) all rated as strong.

The site summaries set out in Appendix F of the sustainability Appraisal illustrate how close the 'Promoted' and 'Preferred' site are considered to be. In these summaries the 'Preferred' site has a lower sensitivity to housing development in part, while the 'Preferred' site has a lower level of Green Belt harm in part. The final conclusions appear to rely on the assessment of 'moderate-high' Green Belt harm for the 'Preferred' site, in comparison to 'high' Green Belt harm for the 'Promoted' site to define the final decision.

The potential harm to the Green Belt is considered in Section 2.4 of the report (Appendix 2) and two points are evident as follows;

- The 'Preferred' site is described as being tightly contained by outcrops of the settlement of Wolverhampton. But as illustrated in Figure 5 and the presence of the disused railway to the north this is not correct.
- The 'Promoted' site is far more influenced by the adjacent urban environment than the 'Preferred' site and this influence already affects the adjacent Green Belt and would not increase if the site were developed. As defined in the SLSA *"this sense of rural character is reduced due to the wide visibility of surrounding settlement including long distance views of the tower blocks within Wolverhampton"*.

Thus, it is considered that the 'Preferred' site performs more strongly contributing to the Green Belt terms and its development would result in greater harm. The methodology for defining the level of harm caused to the Green Belt is identified in paragraph 6.23 of the Green Belt study which states that:

*"Where land makes a strong contribution to one of the Green Belt purposes, and where its release would partially weaken adjacent Green Belt (for example by increasing its containment by urban areas), harm is likely to be **high**"* (it is assumed this excludes purpose 5 which is common to all sites).

The 'Preferred' site is stated as making a 'strong' contribution to three of the Green Belt purposes as stated for on Page 663 of Appendix 3 of the Green Belt Study. The release of this site would increase pressure on the Green Belt land further west. This Green Belt land forms a triangle of land trapped between the converging disused railway and Langley Road. This triangular area already has a notable level of development further along Langley Road and across back garden plots between Langley Road and the disused railway.

Thus, the level of Green Belt harm for the 'Preferred' site must amount to high and not moderate-high as defined.

In comparison, the 'Promoted' site also has a strong contribution to three of the Green Belt purposes as identified, but its potential to increase the containment of remaining Green Belt is much more limited. In addition, the urban influence on the adjacent Green Belt is already present along the prominent developed ridge top and no further urban influence is likely to extend into the Green Belt through the development of the 'Promoted' site. The 'Promoted' site thus has a closer relationship with the adjacent urban area rather than the

wider Green Belt and the high level of harm identified on the Green Belt is considered excessive and should be lower than identified.

The restriction of urban sprawl and effects on the Green Belt have already been examined in paragraph 2.3.2 with the reference to paragraph 4.9 of the Green Belt Study which states;

“Land that has a stronger relationship with a large built-up area than with open land, whether due to ... the dominance of adjacent urban development ... makes a weaker contribution to this purpose.”

For these reasons it is considered that the harm to the Green Belt would be less for the ‘Promoted’ site (Site 494a and 494b) in comparison to the ‘Preferred’ site (Site 582).

5.0 Ecology Considerations

A review has been undertaken of the documentation available regarding the consideration of sites at Land at Springhill Lane Parcel (494a and 494b) and Land off Langley Road (582) which is proposed for housing allocation in the South Staffordshire Local Plan Review.

This document only reviews the ecological reasons for allocation or non-allocation based on Sustainability Appraisal (SA) Objective 3: Biodiversity and Geodiversity Assessment Methodology see Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Plan August 2021 report Box 3.3. A summary of the reasons for exclusion or inclusion is provided below.

The appraisal provides guidance as to when a potential impact should be considered as a major negative, minor negative etc. which are summarised as:

- Major Negative - the size, nature and location of a development proposal would be likely to permanently degrade, diminish or destroy the integrity of a quality receptor such as a feature of international, national or regional importance; and/or
- Minor negative - the size, nature and location of a development proposal would be likely to not quite fit into the existing location or with exiting receptor qualities; and or affect undesignated yet recognised local receptors.

Within SA Objective 3 – Biodiversity and Geodiversity it is noted that sites 494a and 494b are located approximately 560m from a stand of ancient woodland and therefore it could have a potentially minor negative impact on these ancient woodlands due to an increased risk of disturbance.

A review of government guidance on ancient woodlands² does not include a set buffer beyond which not impact would be anticipated but rather that a project at the planning application stage should provide evidence as to why they believe there would be no increased risk of disturbance. It is anticipated that the term disturbance used in the Sustainability Appraisal of the South Staffordshire Local Plan Review refers to disturbance to wildlife from additional traffic and visitors to the ancient woodland.

It is considered that there would be no direct impacts from the proposed development Land at Springhill Lane (site 494a and 494b) due to the separation distance involved and therefore there would be no risk of direct damage to the site. Nevertheless, the Sustainability Appraisal for the South Staffordshire Local Plan Review considered that the impact of the proposed development of Land at Springhill Lane (site 494a and 494b) would be a minor negative impact due to the risk of disturbance to Ancient Woodland approximately 560m away.

The Land at Springhill site (site 494a and 494b) is separated from the closest area of Ancient Woodland at Nut Tree Coppice (National Grid Reference: SO 875 950) by Springhill Lane, a cricket club, various residential properties and Showell Lane (See Ecological Designations Drawing 11 within the Site Promotion Document [Appendix 1]).

The area of Ancient Woodland at Nut Tree Coppice is located to the south of Showell Lane, with residential properties and gardens blocking immediate access to the woodland. It is noted that there is a path from Showell Lane, through the field separating Nut Tree Coppice and Blazebank to Orton Grange on Orton Lane but this does not give public access to the Ancient Woodland. As such, the potential for linkages between the Springhill Lane site and the Ancient Woodland (or for an increase in visitors to the Ancient Woodland) is considered minimal.

² <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

In addition, as identified above, being separated by Springhill Lane the ancient woodland is also separated from the Springhill Lane site (site 494a and 494b) by a cricket club and existing residential properties of the Springhill area of Penn, Wolverhampton . There is no public footpath connecting Land at Springhill Lane site (site 494a and 494b) and the Ancient Woodland at Nut Tree Coppice. There is an informal footpath off Springhill Lane in the field between Greenway House Residential Home and Springhill Cricket Club which passes through the fields and it appears then it is used to connecting into the access road for Springhill Cricket Club and does not offer public access to Showell Lane.

It is therefore considered that the risk of a minor negative impact through disturbance of the Ancient Woodland located approximately 560m away from Land at Springhill Lane Parcel A (494a) and Land at Springhill Lane Parcel B (494b) is unlikely due the separation of the land parcels by existing properties, roads and a lack of public access to the woodland. On this basis, this element of the scoring within the Sustainability Appraisal is considered incorrect.

6.0 Socio-Economic Considerations

An Education Capacity Overview Statement has been prepared in response to the identified scoring for the Springhill Lane site (site 494a and 494b) when compared to the land North of Langley Road site (site 582). This competing site has scored/performed higher than the Springhill site given its proximity to Bhylls Acre Primary School. However, in utilising an arbitrary 800m search criterion, the evidence base utilised has failed to give consideration to the catchment of other schools and the capacities currently contained therein.

The submitted assessment has demonstrated that although the preferred site is closer to the primary school, there is no capacity at Bhylls Acre Primary School to accommodate a significant increase in pupils generated by a housing development.

The assessment has shown that despite Bhylls Acre Primary School not having capacity for additional pupils, there are plenty of schools that are within walking distance to both sites. However, the minimum capacity of 390 dwellings proposed by the Land off Langley Road would push many of the surrounding schools well past their capacity. The only secondary school within South Staffordshire is Wightwick Hall School. The housing development at Land of Langley Road would push the secondary school well past its capacity meaning that there would be no available secondary school within South Staffordshire.

It could be argued that the Land at Langley Road scheme would be phased, Developer Contributions would be sought, or the pupils generated could use a combination of schools to reduce the impact. However, it can be concluded that the release of the smaller parcel of the Springhill Site (site 494a) would put far less pressure on the schools and certainly should not be scored lower in terms of education provision. Even if the wider Springhill Site were to be released (494a and 494b), the same mechanisms for upgrading schools provision would be necessary (i.e developer contributions) for both sites and the scoring should again be comparable to those given to site 582.

As highlighted in Section 3 of the report, the assessment was not intended to undertake a full education capacity assessment. Its purpose is to highlight whether there is education provision beyond the 800m target area set by the Sustainability Appraisal.

7.0 Summary and Closure

SLR Consulting Limited has been instructed by Jay Farm Homes and Lawnswood Homes to prepare representations to the South Staffordshire Council Local Plan Review, Preferred Options Consultation process in support of their site at Springhill Lane, Wolverhampton.

These representations have been formed through a review of the published information available on the Local Plan Review webpage of the South Staffordshire Council website and the associated consultation portal. This submission seeks to provide answers to each of the questions posed within the consultation portal, whilst further detailed comments are raised with regard to the overarching content of the published Preferred Options document and associated evidence base.

As outlined above, a range of comments have been made with regard to the content of the evidence base documents and the associated site assessments. Our client duly requests that these be considered in full to allow due consideration of their landholding at Springhill Lane, Wolverhampton and the proposed Spatial Strategy for housing allocations within the authority area.

It is contended that site 494a performs/scores better than site 582, whilst site 494b is considered to score comparably to site 582. It is therefore requested that the Council duly consider the points raised above and herein with respect to the assessment of parcels 494a and 494b in regard to the site allocations identified within the Preferred Options consultation. Indeed, the Council should consider:

- Whether site 494a should be allocated in addition to site 582;
- Whether sites 494a and 494b are a more appropriate allocation to that proposed at site 582; or
- Whether site 494a and/or site 494b should be safeguarded for potential future allocation within subsequent local plan reviews.

We trust that the above and enclosed is satisfactory to consider these formal representations. However, should you have any queries please do not hesitate to contact us directly. Jay Farm Homes and Lawnswood Homes reserve the right to make further representations and further comments regarding the Local Plan process at the appropriate time.

APPENDIX 1

Site Promotion Document – Springhill Lane, Wolverhampton

APPENDIX 2

Green Belt Criteria Comparison Report

APPENDIX 3

Education Capacity Overview Statement

EUROPEAN OFFICES

United Kingdom

AYLESBURY

T: +44 (0)1844 337380

BELFAST

belfast@slrconsulting.com

BRADFORD-ON-AVON

T: +44 (0)1225 309400

BRISTOL

T: +44 (0)117 9064280

CARDIFF

T: +44 (0)2920 491010

CHELMSFORD

T: +44 (0)1245 392170

EDINBURGH

T: +44 (0)131 3356830

EXETER

T: +44 (0)1392 490152

GLASGOW

glasgow@slrconsulting.com

GUILDFORD

guildford@slrconsulting.com

LONDON

T: +44 (0)203 6915810

MAIDSTONE

T: +44 (0)1622 609242

MANCHESTER (Denton)

T: +44 (0)161 5498410

MANCHESTER (Media City)

T: +44 (0)161 8727564

NEWCASTLE UPON TYNE

T: +44 (0)191 2611966

NOTTINGHAM

T: +44 (0)115 9647280

SHEFFIELD

T: +44 (0)114 2455153

SHREWSBURY

T: +44 (0)1743 239250

STIRLING

T: +44 (0)1786 239900

WORCESTER

T: +44 (0)1905 751310

Ireland

DUBLIN

T: +353 (0)1 296 4667

France

GRENOBLE

T: +33 (0)4 76 70 93 41