

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

LAND NORTH OF LINTHOUSE LANE

REPRESENTATION PREPARED ON BEHALF OF TAYLOR WIMPEY UK LTD

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Appendix

Appendix 1- Vision Document



1. Introduction

- 1.1. This representation responds to the South Staffordshire District Council's ('SSDC') Local Plan Review 'Publication Plan' ('the Plan') consultation held under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Representations are made with regard to the Plan itself and to the accompanying published evidence, having regard to the National Planning Policy Framework ('NPPF').
- 1.2. This representation is made by Pegasus Group on behalf of Taylor Wimpey UK Ltd ('Taylor Wimpey') in respect of their land interest in the proposed housing allocation adjacent the boundary of Wolverhampton, identified at Policy SDS5 as 'Site Ref No. 486c Land north of Linthouse Lane with a minimum capacity of 1,200 dwellings by 2039 ('the Site')'.
- 1.3. This representation should be read alongside other representations submitted by Taylor Wimpey in respect of other interests, including Land to the North of Blackhalve Lane, Wolverhampton.
- 1.4. Taylor Wimpey has previously submitted details of the Site through the Regulation 18 Preferred Options Plan, which included the production of a Vision Document to demonstrate how the site could be delivered; an updated Vision Document is attached to these representations at Appendix 1 for completeness. Separate representations have also been made on behalf of Taylor Wimpey for another site north of Blackhalve Lane.
- 1.5. The site extends to 123.28 hectares and is within a highly sustainable location adjacent to the City of Wolverhampton. The site adjoins the northern edge of the Black Country conurbation and comprises as a natural sustainable, urban extension to Wolverhampton. There are no significant physical barriers to development. There are, however, a number of physical features which serve to shape the development shown on the illustrative masterplan. These include the overhead power lines which traverse the site in a north-west to south-east direction as well as the localised topography of the site, existing vegetation, and public rights of way.
- 1.6. 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.

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



2. Planning Policy Context

- 2.1. Taylor Wimpey supports SSSDC'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 a review was 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. Further, the commitment in the emerging Plan to undertake a review at least once every five years, is in accordance with NPPF para 33, which requires local planning authorities to keep policies in their Local Plans up to date by undertaking such a review.
- 2.5. The Proposed Publication Plan consultation follows previous consultations on the Local Plan 'Preferred Options' review which identified a spatial strategy with the identification of housing and employment delivery, whilst also identifying strategic objectives and priorities through numerous policies. The current consultation document represents SSSDC'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.
- 2.6. 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.*¹ In the context of South Staffordshire, strategic matters include housing, employment, infrastructure, and the Green Belt.

- 2.7. Taylor Wimpey supports SSSC's proactive approach in continuing with a review of the Local Plan, to ensure that an up-to-date policy framework exists with 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. It is considered that on this element it remains relevant and is broadly supported.
- 3.3. The Local Plan Review Vision does not include, however, the Council's declared climate emergency (declared in 2019), with greater emphasis placed on providing homes which accord with NPPF para 8c which sets out that in order to achieve sustainable development, proposals should mitigate and adapt to climate change. It also seeks to 'protect and enhance' the District as it currently exists, rather than thinking forward and considering how growth could actually better the District as a whole. The Vision should be appropriately reworded to include South Staffordshire's declared climate emergency.
- 3.4. In addition, 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.
- 3.5. 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 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 Taylor Wimpey 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. Taylor Wimpey believes the proposed Local Plan would highly benefit from an introduction of a similar policy within the emerging Local Plan, especially in light of the recent collapse of the Black Country Plan which has led to greater instability of housing supply across the GBBCHMA. The introduction of safeguarded land would allow the Council to assess sites suitable for development and fully maximise the District's capability to greater assist the GBBCHMA growing unmet housing need.
- 4.7. Relevant Green Belt boundary amendments, including the identification of safeguarded land should therefore be considered in the current LP review.
- 4.8. Policy DS2 (Green Belt Compensatory Improvements) is a new policy included within the Regulation 19 Publication Plan. The Policy provides additional detail on expected compensatory improvements for Green Belt released sites when compared to the Preferred Options Document. Taylor Wimpey supports the inclusion of a policy setting out the need for Green Belt compensation in relation to sites being removed from the Green Belt. However, the policy still leaves elements of ambiguity and its practical application unclear. Whilst it is appreciated that the SSDC have outlined that 'applicants must demonstrate proportionate compensatory improvements', this does not provide a clear requirement for Green Belt compensation and a revised policy approach is preferred as outlined below.
- 4.9. Policy DS2 also sets out the following hierarchy for Green Belt compensation.
 - a) *Compensatory improvements to remaining Green Belt land adjacent to, or in close proximity to the development site;*
 - b) *Compensatory improvements to remaining Green Belt land within the wider locality accommodating the development;*
 - c) *Compensatory improvements to remaining Green Belt land in an area identified through the council's latest Nature Recovery Network mapping or Open Space Strategy.*



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

- 4.10. The hierarchical approach to the Green Belt compensation policy as drafted is not supported. Neither the NPPF nor the PPG refer to a hierarchy of preferred methods of Green Belt compensation. Furthermore, when assessing the policy, it is not at all clear that the preferred methods of Green Belt compensation would deliver a greater benefit than the approaches lower down the hierarchy.

Housing- Policy DS4

- 4.11. Taylor Wimpey broadly supports limb a of Policy DS4 which sets a housing target of 9,089 homes over the Plan period whilst providing approximately 13% additional homes to ensure plan flexibility. Upon review of the Local Plan evidence base, it is unclear how the Council have concluded that the housing target includes 13% additional homes. This figure is not evidenced in the Evidence Base and Taylor Wimpey requests the Council provide clarification on this figure.
- 4.12. The principle of the proposed 4,000 houses to support the GBBCHMA shortfall is broadly supported by Taylor Wimpey. 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 collapsed 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.
- 4.13. 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.

- 4.14. As a result of the overwhelming shortfall in both the Black Country and Birmingham and despite South Staffordshire allocating 4,000 homes, Taylor Wimpey considers that there is scope for an uplift to this figure.
- 4.15. In regard to SSDC's 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, Taylor Wimpey raises concerns regarding potential insufficient housing to meet the District's housing needs.
- 4.16. 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.
- 4.17. 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.
- 4.18. 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.
- 4.19. 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.

4.20. 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 Development Forum in October 2022, Quod¹ advised that the 2021 Census figures should be considered with caution. Reasons for such caution are identified in the Paper as:

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

4.21. 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.

4.22. Taylor Wimpey considers a larger contribution, especially on sites adjacent to existing allocations, 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.

Economic Uplift and Housing Figures

4.23. 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-

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



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.

- 4.24. The Economic Development Needs Assessment 2020–2040 (June 2022) (EDNA), prepared by DLP Planning on behalf of South Staffordshire District Council, 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.
- 4.25. 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*'.
- 4.26. 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. 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, as raised above, Taylor Wimpey 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.

Longer Term Growth Aspirations for a new settlement- Policy DS6

- 4.27. 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.
- 4.28. Taylor Wimpey made representations to the Preferred Options Plan and has no comment to make in respect of Policy DS6, other than to agree that such an option would not contribute to housing growth during the proposed plan period to 2039.

5. Site Allocations

Masterplanning Strategic Sites- Policy MA1

- 5.1. Policy MA1 is a new Policy included within the Regulation 19 Publication Plan. It sets out a requirement for each Strategic allocation to produce a Strategic Master Plan which will be confirmed by the Council in pre-application discussions. Taylor Wimpey broadly supports this approach, and an illustrative masterplan accompanies this representation for completeness which can be found within the appended Vision Document.
- 5.2. However, concern is raised relative to some of the overly prescriptive detail set out in the matters to be included within the Strategic Master Plans, including specific elements such as forest schools (at limb e).

Strategic development location: Land North of Linthouse Lane- Policy SA3

- 5.3. Taylor Wimpey supports the proposed strategic housing allocation at Land North of Linthouse lane (ref: SA3).
- 5.4. Taylor Wimpey also supports the inclusion of site-specific policies to establish a vision for each site, alongside a requirement for a detailed masterplan and design code.
- 5.5. In the context of Land North of Linthouse Lane, the Publication Plan identifies the site provides the opportunity to deliver a minimum of 1,200 homes over the Plan Period. The Strategic Masterplanning Location Proforma for Linthouse Lane (found at Appendix B of the Publication Plan) identifies the site has a minimum capacity of 1,976. Taylor Wimpey concurs with this minimum requirement for delivery within the Plan period but considers that the total number of homes would need to reduce (to c 1,750 homes) with the inclusion of the on-site sports pitches as shown on the illustrative masterplan within the appended Vision Document.
- 5.6. Taylor Wimpey welcomes the removal of the requirement for a Supplementary Planning Document for Linthouse Lane. Such a document would be superfluous given the commitment in the Local Plan to develop a Strategic Master Plan and design code for the site as described below in accordance with Policy MA1.



- 5.7. Taylor Wimpey is committed to preparing the Strategic Master Plan in accordance with the requirements established through Policies MA1 and SA3 through a collaborative approach including engagement with the local community and key stakeholders. Significant masterplanning and design work has already been undertaken by Taylor Wimpey, as evidence through the Vision Document at Appendix 1.
- 5.8. There are, however, elements of the Policy which Taylor Wimpey has concern. Limb g) refers to delivering any historic environment mitigation measures identified by the Council. Such an absolute requirement is not considered to be appropriate for Local Plan policy. In addition, the policy refers to integrating the former Prestwood into the design of any proposed development and avoiding any direct impacts upon these non-designated remains. Whilst these sites can be adequately addressed in the proposal, it is unlikely that no impact will result at all, and such an approach is inconsistent with national policy relative to Heritage assets in the NPPF. As a result, the policy as drafted is unsound as it would be inconsistent with national policy and would not be justified as an appropriate strategy for the development of the site.

Housing Allocations – Policy SA5

- 5.9. Taylor Wimpey supports the allocation of their land interests identified through Policy SA5 at Land north of Linthouse Lane (ref: 486c) (and at Land at Cross Green (ref: 646 a&b).
- 5.10. A Vision Document for Land North of Linthouse Lane is submitted with this representation in support of the site, within Appendix 1.
- 5.11. South Staffordshire District Council at Strategic Objective 2 identify that housing growth will be located at the Districts most sustainable locations to facilitate growth and assist in meeting the wider unmet housing needs. It is considered that land North of Linthouse Lane is a highly sustainable site, capable of supporting housing growth to meet the housing need.
- 5.12. Land North of Linthouse Lane is located immediately adjacent to the settlement edge of Wolverhampton and, as such, is not associated with any stand-alone settlement located within South Staffordshire. Nevertheless, Policy DS5 indicates the site as one of three sites which seeks to facilitate sustainable growth adjacent to the Black Country to support growth of their towns and cities and assist in meeting the wider unmet housing needs from the housing market area. The site benefits from good access to local facilities including shopping,



health services, and educational facilities. The site is also well placed in terms of accessibility to existing pedestrian and public transport networks. Policy DS5 indicates that the Council will work cross-boundary with infrastructure bodies and statutory parties to ensure the three sites are supported by necessary infrastructure, a notion which Taylor Wimpey supports.

- 5.13. The Housing Site Selection Paper (2022) sets out detailed commentary on the Proposed Housing Site Allocations set out at Policy SA5. The paper concludes at paragraph 5.24.11 that the entirety of the site at land north of Linthouse Lane is of 'high Green Belt harm', making it less harmful than other large scale site options adjacent to the northern edge of the Black Country. The site also falls within an area of 'moderate-low' landscape sensitivity, which again is also less sensitive than other large scale site options in this area.
- 5.14. Taylor Wimpey supports the allocation of Land North of Linthouse Lane and as set out above it is clear the site is sustainably located and should remain an allocation within the Local Plan.
- 5.15. It should be noted that whilst Taylor Wimpey supports the overall strategy of the Plan, there is concern over the potential lack of safeguarded land as outlined at paragraph 4.5 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 Council is encouraged to safeguard in the most sustainable locations as to ensure sustainable housing growth can be achieved during the plan period and that GB boundaries can endure beyond the Plan period.

6. Development Management Policies

Policy HC1- Housing Mix

- 6.1. Housing mix should be guided by market signals as reflected in the most up to date assessment needs. Such assessments will need to be updated over the course of the Plan period.
- 6.2. The requirement that 70% of properties comprise of 3 bedrooms or less is restrictive and does not afford the flexibility expected by NPPF para 62 in order to meet the need to provide for a range of size, type, and tenure for different groups.
- 6.3. The use of the phrase 'disproportionate' in the penultimate paragraph, when describing the quantum of 4+ bedroom houses, lacks the precision and clarity needed for a Plan policy.
- 6.4. The policy should recognise that needs and demand will vary from area to area and site to site and recognise 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. Taylor Wimpey suggests a definition of major

development should be reintroduced into the Plan, with the DMPO definition referred to above used 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. Taylor Wimpey welcomes 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 as suggested within Taylor Wimpey's Regulation 18 Representations.

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 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. Taylor Wimpey 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 will be required to demonstrate how the proposal contributes to meeting the needs of older and disabled people. 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. In relation to the site at Linthouse Lane, Policy SA3 requires 80 units for specialist elderly care housing which Taylor Wimpey is supportive of.
- 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 brings with it significant additional 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 noted the above, it is also noted that the Council's Viability Study 2022 simply refers to a Government consultation².
- 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 change to Building Regulations and statutory guidance, on which the Government will consult further in due course.
- 6.29. At the present time, 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".

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

- 6.32. 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, 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.
- 6.33. Whilst Taylor Wimpey generally supports the concept of self-build/custom housing, they do not consider provision as part of a larger housing development to be 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.
- 6.34. Taylor Wimpey supports the notion 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

- 6.35. 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 Taylor Wimpey' experience, local highway authorities do not want trees in immediate proximity of the street due to management concerns or liabilities or introduce additional development costs due to associated commuted sum payments.
 - 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

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



6.37. Taylor Wimpey suggests that some flexibility must be allowed in the application of the Nationally Described Space Standards (NDSS) as occasional non-compliance with NDSS may be appropriate for sound urban design reasons and the Policy should therefore build in some flexibility.

6.38. 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.”*

6.39. 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.

HC13- Parking Standards



- 6.40. Taylor Wimpey supports the proposed parking standards contained within the Publication Plan.
- 6.41. The proposed limb b, which seeks to reduce on site parking where developments are well served by public transport is highly supported by Taylor Wimpey given this addresses the Council's declared climate emergency.
- 6.42. It is noted that the Council's Viability Assessment includes a cost of only £500 per EVCP. This cost is below the Government's cost estimate and excludes any costs for upgrading local networks. The Department for Transport – Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated a cost of £974 per EVCP plus an automatic levy for upgrading networks capped at £3,600. This is not reflected in the Stage 2 Viability Study.

Policy HC14- Health Infrastructure

- 6.43. 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.
- 6.44. 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.
- 6.45. Taylor Wimpey considers this policy should provide additional flexibility by recognising on-site provision of health infrastructure may represent a more appropriate solution to meeting health needs.

Policy HC15- Education

- 6.46. Taylor Wimpey broadly supports the policy 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.

- 6.47. 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.

Policy HC17- Open Space

- 6.48. 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.

Policy HC18- Sports facilities and playing pitches

- 6.49. Policy HC18 is informed by the Playing Pitch and Sport Facilities Assessments produced by KKP in 2020 and is broadly supported.
- 6.50. 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.
- 6.51. The requirements for playing pitches are set out in the Future Housing Growth and Playing Pitch Requirements Topic Paper (November 2022). The current masterplan for the Land North of Linthouse Lane site identifies where sports pitches and associated facilities could be located in accordance with the requirements set out in the Topic Paper. These requirements are supported by Taylor Wimpey.
- 6.52. Taylor Wimpey would however seek guidance on the requirements the additional housing to be provided on Land North of Linthouse Lane beyond the Plan period. Taylor Wimpey would wish to engage with the Council as soon as possible to agree what the additional requirement is to ensure that it can be appropriately provided for within the Strategic Master Plan.



Policy EC3- Inclusive Growth

- 6.53. 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 modern methods of construction inevitably increasing in the coming years, probably sourced from outside South Staffordshire.
- 6.54. It is not clear how any certainty could be provided through such a plan. It should be recognised that the business model employed by Taylor Wimpey (and other major housebuilders) relies upon subcontract businesses.
- 6.55. Despite this, construction stage opportunities include:
- Taylor Wimpey can deliver a comprehensive employment, training, and skills strategy as part of the construction stage;
 - The strategy can include opportunities to engage with schools and colleges; and
 - Taylor Wimpey will prioritise the procurement of materials and labour locally where possible
- 6.56. 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 EC8- Retail

- 6.57. Taylor Wimpey notes the reference to a small quantity of retail provision being supported within Policy EC8 at Linthouse Lane to support the existing Retail Centres Hierarchy.
- 6.58. It is intended that retail floorspace will be included within the central Community Hub as part of a mix of commercial and community facilities.



- 6.59. Taylor Wimpey is supportive of the inclusion of commercial floorspace at Land North of Linthouse Lane.

Policy EC11- Infrastructure

- 6.60. 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.
- 6.61. The Policy should also commit SSDC to actively engage and work with neighbouring authorities where necessary, such as at the proposed allocation of Land North of Linthouse Lane where transport connections fall outside of the SSDC boundary.
- 6.62. Unless amended, the policy is considered unsound, as it is neither *justified* nor *consistent with national policy* for the reasons set out above.

Policy NB2- Biodiversity

- 6.63. Taylor Wimpey is supportive of the need to address net losses to Biodiversity, through the provision of enhancement to deliver and 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.
- 6.64. 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.

Policy NB4- Landscape Character



6.65. Policy NB4, would benefit from 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"

6.66. 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:

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

Policy NB6– Sustainable Construction

6.68. 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.

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

6.70. '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.'

6.71. In reference to the above clause there is no evidence to suggest that the Council have considered or addressed the Data Protection 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. The Policy should therefore contain wording that that they will be reviewed to account for future changes to Government legislation, policy, guidance, and regulation changes

- 6.72. Whilst Taylor Wimpey supports the government's proposal to achieve 'Zero Carbon Ready' homes by 2025, this will be achieved through application of low carbon heating and hot water technology and highly insulated fabric building elements i.e., walls/floor/roofs which will in turn reduce the energy demand for the home. The decarbonisation of the electricity grid will only improve the carbon reduction of a proposed development over time. Until many of the emerging national standards are fixed, the industry will be unable to confirm how it will deliver further carbon reduction over Building Regulations. In view of these uncertainties the proposed policy should be flexible enough to allow developers to utilise the most appropriate technology available at that time. The Government's approach "remains technology-neutral and designers will retain the flexibility they need to use the materials and technologies that suit the circumstances of a site and their business". (MHCLG Summary Response to the FHS (2019 Consultation Changes to Part L and F). On the basis of this the policy should be amended to introduce much greater flexibility and recognition of the emerging approach to this dynamic sector the construction industry.
- 6.73. In addition whilst the Government's response to the FHS (2019 Consultation Changes to Part L and F) states that local planning authorities will retain powers to set local energy efficiency standards for new homes, it also states "as we move to ever higher levels of energy efficiency standards for new homes with the 2021 Part L uplift and Future Homes Standard, it is less likely that local authorities will need to set local energy efficiency standards in order to achieve our shared net zero goal". (MHCLG Summary Response to the FHS (2019 Consultation Changes to Part L and F). The Government's proposals set out in both part 1 of its Future Home Standards Consultation has set a target for homes to be 'zero carbon ready' from 2025 rather than necessarily achieving 'zero carbon' from 2025.
- 6.74. The Policy should also contain a viability exception clause and avoid a simple pass or fail test to ensure they do not prejudice the future delivery of sustainable development.
- 6.75. Taylor Wimpey recognises the importance of reducing embodied carbon within the development process. However, Embodied carbon emissions are unregulated in the UK. Current policy and regulation focus solely on operational energy use, as distinct from embodied carbon. There currently does not exist a nationally approved regulator or national recognised standard, national planning policy or building regulation requirement to assess and report embodied carbon emissions or whole life cycle carbon assessments.



- 6.76. The costs of introducing the proposed policy requirements must be included within the Plan viability assessment and viability assessment of strategic sites. This should include the cost of network upgrades to support technologies. Where a viability assessment is submitted to accompany a planning application, this should be based upon and refer back to the viability assessment that informed the plan, with evidence of what has changed since then.
- 6.77. Whilst Taylor Wimpey support responding to climate change and reducing carbon emissions, the proposed policy is ambiguous, its specific requirements unjustified and it has not been subject to either viability testing nor assessment whether the technology is available to deliver it.

7. Sustainability Appraisal

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

- **SA Objective 1. Climate change mitigation:** Minimise the Plan area's contribution to climate change.
- **SA Objective 2. Climate change adaptation:** Plan for the anticipated impacts of climate change.
- **SA Objective 3. Biodiversity and geodiversity:** Protect, enhance, and manage the flora, fauna, biodiversity, and geodiversity assets of the district.
- **SA Objective 4. Landscape and townscape:** Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.
- **SA Objective 5. Pollution and waste:** Reduce waste generation, increase the reuse of, and recycling of, materials whilst minimizing the extent and impacts of water, air, and noise pollution.
- **SA Objective 6. Natural resources:** Protect, enhance, and ensure the efficient use of the district's land, soils, and water.
- **SA Objective 7. Housing:** Provide a range of housing to meet the needs of the community.

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



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

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

7.3. The significance of effects is scored as follows:

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

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

Table 7.1 Guide to scoring significance of effects

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

Land North of Linthouse Lane: Site Ref: 486c

7.5. The Site is assessed within the Updated 2022 SA as 'Land North of Linthouse Lane', under site reference 486c (Policy SA3). This includes an assessment of the nature and magnitude of the impact of development 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
486c	+/-	-	-	-	-	-	+	-	-	-	-	+

Figure 7.1 Significance of effects pre-mitigation

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
486c	+/-	+	0	-	-	-	+	-	0	-	-	+

Figure 7.2 Significance of effects post-mitigation

7.6. Taylor Wimpey supports the above scoring overall but disputes the finding that developing the site would result in a Major Negative impact upon landscape and townscape.

7.7. The SA (2022) sets out that the site lies within an area assessed of 'low-moderate' landscape sensitivity and is considered to result in a 'high' level of harm to the purposes of the Green Belt.

7.8. In respect of other aspects, the sites were only found to have 'low-moderate' landscape sensitivity or a 'negligible' impact on landscape character and cultural heritage.

7.9. 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. Not only is this considered inaccurate regarding the summary of

Green Belt impact, but it also implies that the consideration of Green Belt impact carries significantly greater weight than other landscape considerations in the overall assessment of impact upon Landscape and Townscape.

7.10. The Green Belt Study shows the Site as falling within Green Belt Sub-Parcel reference: S20Fs1 – ‘Ashmore Park/Essington’, 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 adjacent or close to the large built-up area, contains no or very limited urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside.	Strong
P2: Preventing the merging of neighbouring towns	Land lies between Wolverhampton (West Midlands conurbation) and Cheslyn Hay (Cannock built up area). The M6 and M54 motorways contribute to perceived separation, however the extent of intervening inset development acts to reduce the perceived open countryside gap.	Moderate
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (i.e., an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	Strong
P4: Preserve the setting and special character of historic towns	Land does not contribute to the setting or special character of a historic town	Weak / No contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong

Table 7.2: Land Parcel S20Fs1 Contribution Towards Green Belt Purposes

7.11. However, it should be stressed that parcel S2OFs1 contains a wider extent of land than just the site; the parcel also includes tracts of land to the northeast, up to and including land adjacent to Essington, as illustrated below.

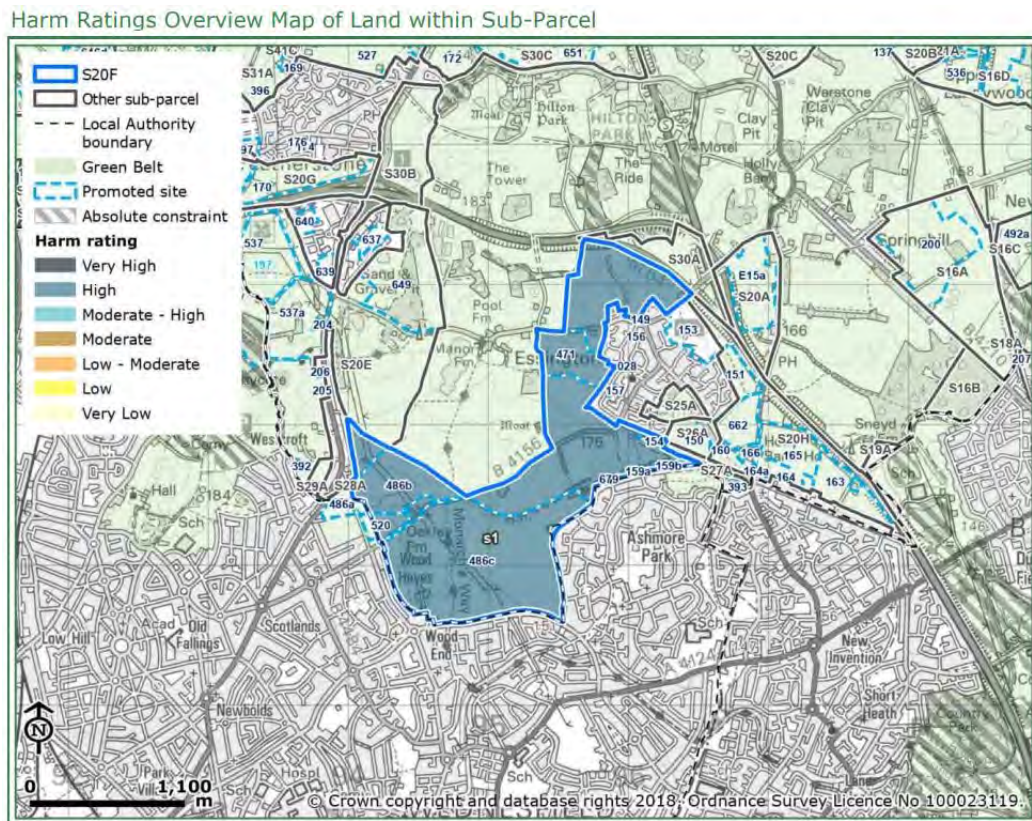


Figure 7.3: Green Belt Harm Rating for Sub-Parcel Ref: S2OF (South Staffordshire Green Belt Study July 2019)

7.12. In this regard, it is contended by Taylor Wimpey that the Site has a reduced importance against purposes 1 and 3 of the Green Belt; checking the unrestricted sprawl of large built-up areas and Safeguarding the countryside from encroachment.

7.13. Regarding these purposes, the Site is adjacent the built-up area and, contrary to the wider Green Belt parcel, has strong urbanising influences by virtue of this relationship. The development of the Site would not extend further into the countryside than the existing built extent of Wolverhampton (defined by Blackhalve Lane and Kitchen Lane). As such, the development of the Site would not result in the 'sprawl' of the built-up area. Instead, it would serve to 'round off' the urban area in this location. It is therefore contended that the Site only has a 'moderate' contribution to purposes 1 and 3 of the Green Belt.

- 7.14. Overall, it is considered that these reconsidered assessments would result in a revised Green Belt harm finding of 'moderate' which, in turn, would result in a reduced SA impact score of Minor Negative ('-') for the site in respect of Landscape and Townscape.
- 7.15. Taylor Wimpey also disputes the Minor Negative ('-') post-mitigation score attributed to the site in respect of education. SSDC has identified site 486c as a strategic allocation within the draft Local Plan Review. The Vision Document prepared by Taylor Wimpey in support of the Site, includes land for a two-form entry primary school, which would support education provision from residents of the site. It is therefore contended that this mitigation is sufficient to make the overall result of the site Negligible ('0').
- 7.16. Lastly, in respect of the housing objective, the SA states that:
- "Under this objective, development proposals which would result in an increase of 99 dwellings or less would usually be assessed as having a minor positive impact on the local housing provision. Development proposals which would result in an increase of 100 dwellings or more would be likely to have a major positive impact on the local housing provision."*
- 7.17. The scale of the site is well in excess of 100 and should accordingly score a Major Positive ('++') score against the housing objective.

8. Land North of Linthouse Lane

8.1. Taylor Wimpey is currently in control of land to the north of Linthouse Lane and to the south of Blackhalve Lane, as shown on the Site Location Plan appended to this representation (see Appendix 1). This land encompasses that which is identified through emerging Policy SA3 of the Local Plan Review as Strategic Housing allocation '*Land North of Linthouse Lane*'.

Site Description

8.2. The land identified as a draft strategic allocation under Policy SA3 represents a logical and sustainable extension to the existing Major Urban Area that provides an opportunity for delivering approximately 1,750 new homes with associated infrastructure.

8.3. There are no significant physical barriers to development. There are, however, a number of physical features which serve to shape the development shown on the illustrative masterplan. These include the overhead power lines which cross the site in a north-west to south-east direction as well as the localised topography of the site, existing vegetation, and public rights of way.

8.4. An Illustrative Masterplan has been prepared demonstrate how the site could be delivered and function as a natural sustainable, urban extension to Wolverhampton. This includes an approximate offset to the existing power lines, retention of the existing public rights of way and vegetation.

8.5. The Illustrative Masterplan identifies the following key features for land to the north of Linthouse Lane on land which Taylor Wimpey control:

- Circa. 1,750 dwellings
- Provision of land for the delivery of a number of potential community uses, including the provision of a new 2.1ha Primary School;
- Significant provision of Green Infrastructure to include a landscape mitigation strategy;

- Provision of SuDS through the delivery of new attenuation features; and
- A new enduring Green Belt boundary defined by the route of the dismantled railway line with Country Park and Grazing Land beyond.

8.6. A Vision Document has been prepared by Taylor Wimpey which provides further detail in respect of the site and includes the Illustrative Masterplan. This is included at Appendix 1 to this representation.

Green Belt

8.7. The Site lies within the West Midlands Green belt, adjacent to the current built up area of Wolverhampton and within walking distance of many services, facilities, and bus links.

8.8. Whilst the Council's Green Belt Assessment (2019) indicates that development of the site would result in a 'high' level of harm to the purposes of the Green Belt, the conclusion for Green Belt Sub-Parcel ref: S20Fs1 recognises that the existing Green Belt boundaries are not strong.

8.9. The Site consists of single area of open land that bounded on three of its four sides by residential properties, which form part of the Black Country conurbation (eastern, western, and southern boundaries). In effect the conurbation already extends beyond the site to the north via existing development on Kitchen Lane and Blackhalve Lane. The Site would therefore be well contained and not encourage sprawl beyond the period of the Local Plan Review.

8.10. The creation of strong, defensible boundaries is important in protecting the countryside from encroachment. While it is acknowledged that, in theory, the release of any land from the Green Belt could result in encroachment into the countryside, it is considered that the site offers the opportunity to provide strong and defensible boundaries which will protect the countryside and maintain the visual and physical separation between Wolverhampton/the Black Country conurbation and surrounding settlements. This is evidenced by the significant landscape buffer on the northern boundary of the site, as shown on the Illustrative Masterplan. It is recognised that Westcroft is not identified as a separate and distinct settlement in the Green Belt Assessment, and this is supported by Taylor Wimpey.

- 8.11. It is also noted that land the Site represents the only strategic development option to the north of the Black Country that isn't considered by the Council's evidence to result in a 'high' level of harm to the purposes of the Green Belt if development were to be brought forward.

Landscape Sensitivity

- 8.12. South Staffordshire District Council's Landscape Study (2019) finds that the Site has 'moderate' sensitivity in landscape terms.
- 8.13. Pegasus Environment has undertaken a Preliminary Landscape and Visual Appraisal (LVA) to determine the various landscape and visual constraints and opportunities of the wider site area and its context. This includes how these factors might serve to influence the potential for development in respect of an illustrative masterplan, and to influence an inherent landscape strategy as part of that masterplan.
- 8.14. The local landscape context comprises the wider pattern of agricultural land to the north, the topography of which is generally falling to the south towards the site, from a localised ridgeline between Essington and Westcroft. The site is located on gently sloping land between ca. +170m AOD and ca. +145m AOD. To the south, the existing settlement edge of Wolverhampton provides a townscape setting to the site and there are some near distance views into the site from this edge. Longer distance views towards the site are available from the southern edge of Essington and from higher ground to the north. There are no landscape specific designations which cover the site or the immediate area.
- 8.15. The LVA identifies the key constraints and opportunities present in the site and surrounding landscape, and also the nature of the likely impacts that may arise from the proposed development. The LVA has analysed the baseline information in the context of the proposed development and has informed the proposals for landscape mitigation.
- 8.16. The Illustrative Masterplan has incorporated a landscape mitigation strategy which will avoid, reduce, or remedy adverse impacts. The development of the illustrative masterplan has been informed by an initial appraisal of the local landscape and visual constraints and opportunities. As such, the illustrative masterplan:
- Addresses near distance views from the edge of Essington across the Green Belt 'gap' between Essington and the edge of Wolverhampton, to maintain separation and

deal with potential 'coalescence' issues;

- Includes a set-back of the development envelope away from the more elevated area of the site to the north-east;
- Utilises the well-vegetated dismantled railway line as a new Green Belt boundary;
- Provides a central linear open space in response to the offsets required to existing powerlines;
- Ensures an appropriate offset to the public right of way passing through the site along the existing hedgerow running north-south between Linthouse Lane and Blackhalve Lane;
- Addresses longer distance views from the more elevated ground to the north by providing space for additional planting to strengthen the new Green Belt boundary in this location; and
- Establishes a positive relationship with existing residential properties surrounding the site.

8.17. These over-arching principles set the framework for the areas which are proposed for development. Each of these can be subject to a greater level of detail as masterplanning continues to identify constraints and opportunities at a more detailed level.

8.18. It is contended that the site is able to accommodate the proposed residential led development without causing undue harm to the landscape character and visual amenity of the site and surrounding countryside and footpath network.

Impact on the Historic Environment



- 8.19. An archaeological and heritage assessment has been prepared by Environmental Dimension Partnership Ltd to inform the proposal and to assess the potential effects arising from development within the site.
- 8.20. The report confirms that the site does not contain any designated heritage assets such as world heritage sites, scheduled monuments, registered parks and gardens, registered battlefields or listed buildings, where there would be a presumption in favour of their physical preservation in situ and against development.
- 8.21. Only one potentially sensitive designated heritage asset has been identified outside of the site. This is the scheduled ancient monument of Moat Farm moated site, which lies some 160m north of the Site, to the north of Blackhalve Lane. The assessment concluded that whilst there is some potential for a low level of harm to the heritage significance of the monument through the change to its setting, this would need to be weighed against the public benefit of the proposed development, with harm being further mitigated through the detailed design of any proposal.
- 8.22. There are no listed buildings or other designated heritage assets in close proximity to the site, although there are a number of listed and locally listed buildings in the wider area. The assessment concludes that no opportunity for harm to these or any other heritage assets outside of the site is predicted as a result of the development.
- 8.23. The archaeological potential of the Site is assessed as being low. Should any below ground archaeological remains survive, there is no reason to believe or expect that the Site will contain archaeology of such significance that it would require preservation in situ and therefore constrain development of the site. The Site has been intensively farmed and if any below ground deposits are found, they are likely to be poorly preserved due to this agricultural activity, thereby reducing their significance.

Surface Water Flooding

- 8.24. The Site lies in Flood Zone 1, the area at least risk from flooding.
- 8.25. Surface water drainage is proposed to be accommodated through the provision of a series of balancing ponds and SuDS features located around the Site. The Illustrative Masterplan,



included at Appendix 1, identifies the provision of balancing ponds incorporated into a network of green infrastructure.

Highways (Accessibility to the Site)

- 8.26. The Site is well placed in terms of accessibility to existing pedestrian and public transport networks. The site is also located in close proximity to local facilities including shopping, medical services, and education facilities.
- 8.27. There are good public transport links in the area, with 7 two-way buses per hour operating along Linthouse Lane and Cannock Road on a weekday and Saturday and, 4 two-way buses per hour operating on a Sunday.
- 8.28. Travel by rail is achievable as part of a multi-modal trip i.e., park and ride and cycle and ride. From Wolverhampton Train Station there are regular services to Edinburgh, Bournemouth via Birmingham New Street, Aberystwyth via Telford, London Euston, Walsall, and Liverpool. Bloxwich Train Station is also located within the proximity of the site which has regular services to Rugeley Trent Valley and Birmingham international.
- 8.29. Access to the Site can be achieved from the surrounding highway network and there have been discussions with the relevant highway authorities in Staffordshire and Wolverhampton to refine access arrangements including a proposal to now include an access via a traffic island on Linthouse Lane.
- 8.30. The Illustrative Masterplan identifies the following vehicular access points:
- Proposed vehicular access via Linthouse Lane;
 - Proposed vehicular access via Kitchen Lane;
 - Proposed vehicular access via Blackhalve Lane.
- 8.31. The Illustrative Masterplan also identifies the incorporation of existing Public Rights of Way (PRoW) within green corridors and proposes a network of new primary pedestrian routes



maximising opportunities to create sustainable transport links (walking and cycling) to existing and potential new amenities and facilities.

- 8.32. In the longer term, to support a planning application, a Transport Assessment will be completed to assess impacts across the wider network, this will include speed survey work. The Transport Assessment will take account of any local committed development sites and any committed highway improvements. Suitable mitigation will be provided as part of the development proposals including any identified off-site highway works and contributions.

Impact on Natural Environment

- 8.33. Technical work has been undertaken by the Environmental Development Partnership Ltd to guide initial proposals for the Site, having regard to ecological sensitivities pertaining to the site and identifying opportunities and constraints which may influence development.
- 8.34. The Site is not covered by any non-statutory designations, however there are a number of non-statutory sites within 2km of the boundary. With the exception of Ashmore Lodge Biodiversity Alert Site (BAS) and Oakley Farm Potential Site of Importance (PSI), the nature of the designation of each site and the intervening distance means that a potential impact on them from the proposed development is unlikely.
- 8.35. Whilst it is acknowledged that the loss of any best and most versatile land is undesirable, the majority of the site comprises Grade 3 land, and that the scale of development required to support needs arising within the Black Country will necessitate the loss of an amount of Grade 3 land or better under any reasonable option.

Impact on Environmental Quality

- 8.36. 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.
- 8.37. A full Phase 1 Environmental Risk Assessment has been completed for the site. The assessment identifies that it is unlikely that the site would be classified as contaminated land.



8.38. Noise is unlikely to be a significant issue for the proposed development; however, it is likely to have some impact on the form of any proposal. The northern boundary of the site lies adjacent to Blackhalve Lane. The eastern boundary is adjacent to Essington Rugby Club and Kitchen Lane. The southern boundary is adjacent to Linthouse Lane, and the western boundary is bounded by properties off Woodend Road and Cannock Road.

8.39. It should be noted that landscaping would be included throughout the development in conjunction with carefully orientated and sited dwellings and associated gardens to minimise noise impact and preserve residential amenity.

8.40. Consequently, it is unlikely noise will have a significant adverse impact on the development of this site.

Site-Specific Opportunities

8.41. As set out previously within this representation, the development of the site for residential purposes presents the opportunity to deliver:

- Provision of land for the delivery of a number of potential community uses, including the provision of a new Primary School and local retail facilities;
- Significant provision of Green Infrastructure to include a new Country Park;
- Provision of SuDS through the delivery of new attenuation features; and
- A new enduring Green Belt boundary defined by the route of the dismantled railway line and strengthened via the provision of a new Country Park to the north.
- Green belt compensation through the delivery of nature conservation improvements and new recreation routes comprising of sports pitches, new country park and enhancements to the railway walk

Suitability



- 8.42. The information set out above, read in conjunction with the appended Illustrative Masterplan, demonstrates that the Site is suitable for development.

Deliverability

- 8.43. There is an agreement in place between the landowner and Taylor Wimpey to facilitate the development of the Site.
- 8.44. A considerable amount of technical work has been undertaken to demonstrate the deliverability of the Site. Taylor Wimpey can confirm that this work concludes that there are no physical or other constraints likely to render the Site undeliverable. The Site is available now.
- 8.45. There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the potential impacts of the development of the site can be mitigated through design and in many cases a positive outcome can be achieved, such as the strengthening of Wolverhampton's north-eastern boundary through landscaping and utilisation of the dismantled railway line as an enduring new Green Belt boundary.
- 8.46. The Site is deliverable and immediately available and, subject to allocation and removal of the land from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years.



9. Conclusion

- 9.1. This representation is made by Pegasus Group on behalf of Taylor Wimpey UK Ltd to the South Staffordshire Local Plan Review, Publication Plan (Regulation 19). This representation relates to Land North of Linthouse Lane, which Taylor Wimpey is promoting for residential-led development.
- 9.2. Taylor Wimpey is supportive of the Local Plan Review undertaking but has made specific comments on key matters associated with the Local Plan Review. These include on the amount of land identified for housing, Green Belt land release and safeguarded land, on some development management policies, and, on site specific matters associated with the Council's consideration and evidence base on the Land North of Linthouse Lane.
- 9.3. The information contained within this representation, read in conjunction with the appended Development Vision Document and the updated Strategic Transport Assessment, demonstrates that Land North of Linthouse Lane is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 9.4. Taylor Wimpey considers that their land interests at Land North of Linthouse Lane are suitable and deliverable 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, or even beyond as safeguarded land and should remain as an allocation.



Appendix 1

Vision Document

A photograph of a family of three walking away from the camera on a paved path. The mother is on the left, the father is on the right, and a young child is in the middle, holding hands with both parents. The scene is set at sunset, with a warm, golden glow and long shadows cast on the path. Bare trees are visible in the background on the left.

LAND OFF LINTHOUSE LANE, WOLVERHAMPTON DEVELOPMENT VISION

Prepared by Pegasus Group on behalf of Taylor Wimpey UK LTD

December 2022 | BIR.5060

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December 2022 Project code BIR.5060
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**Taylor
Wimpey**



L A N D O F F
L I N T H O U S E L A N E
W O L V E R H A M P T O N



**PEGASUS
GROUP**





EXECUTIVE SUMMARY

This Development Vision document has been prepared by Taylor Wimpey UK Limited ('Taylor Wimpey') and demonstrates that land off Linthouse Lane, Wolverhampton ('the site'), provides the opportunity to create a sustainable, distinctive, and attractive new neighbourhood.

The site is promoted for residential led development in response to its proposed allocation in South Staffordshire District Council's Local Plan Review.

IN SUMMARY:

- Wolverhampton is a strategic settlement within the Black Country conurbation and, as such, is a highly sustainable location for development. The site, whilst located within South Staffordshire District, constitutes a logical extension to the City and would sit within an existing 'recess' in the built form.
- The adopted Black Country Core Strategy recognises Wolverhampton as a highly sustainable location for development.
- The housing need arising from the City of Wolverhampton, South Staffordshire District and the wider Greater Birmingham and Black Country Housing Market Area constitutes exceptional circumstances to justify the release of Green Belt land.
- The site would deliver on the three aspects of sustainable development as per the requirements of the NPPF.
- The site is not affected by any overriding physical, environmental or technical constraints.
- The Development Framework Masterplan demonstrates that the site could accommodate up to 1750 new homes, along with extensive public open space and supporting infrastructure.
- The Development Framework Plan includes land for a new two-form entry primary school and community hub.
- The Development Framework also includes a new Country Park which will include a naturalised green space with mown paths and areas of wildflower planting.
- The development will also include playing sport pitches.
- The development is wholly deliverable and would be completed swiftly by one of the UK's leading housebuilders.
- Taylor Wimpey is committed to engaging with South Staffordshire District Council, Wolverhampton City Council, key stakeholders and the local community in preparing a Strategic Masterplan to deliver a high-quality which delivers real benefits for the area.



Sustainable Development at
Land Off Linthouse Lane
Benefits

Taylor Wimpey

01 The Proposal



up to 1,750
New Homes



30%
Affordable Housing

02 Construction Benefits

£320million

Construction Value
(not including local centre
and infrastructure)

£23million

Gross Value
Added



157

Construction Jobs



289

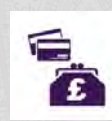
Supply Chain Jobs

03 Operational and Expenditure Benefits



£12.5million

First Occupation
Expenditure



£59million

Household
expenditure per annum

04 Local Authority Revenue Benefits



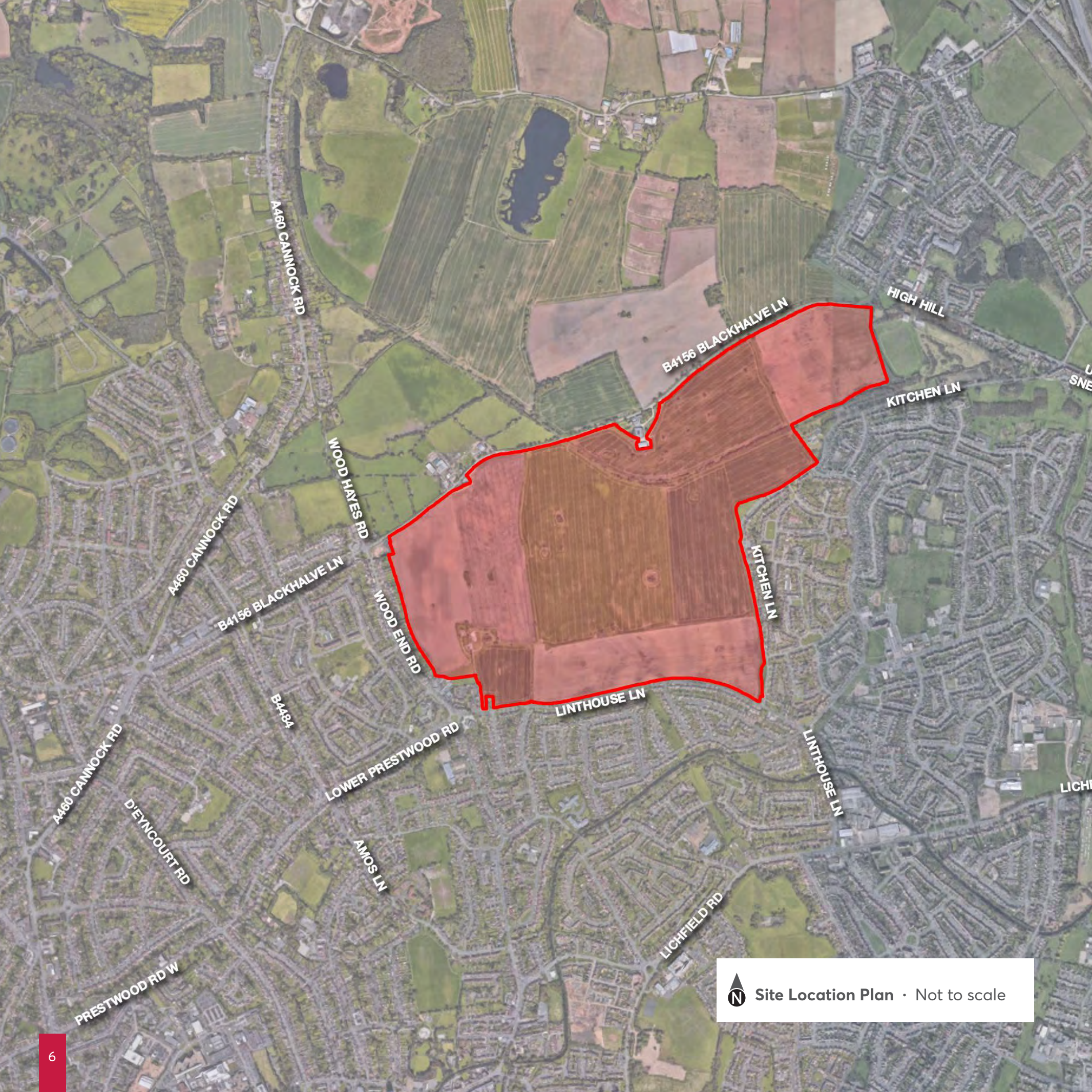
£3.8million

Annual Council Tax
Revenue



£15.3million

New Homes Bonus
Payments



 Site Location Plan · Not to scale

INTRODUCTION

1.1 Land off Linthouse Lane, Wolverhampton, provides the ideal opportunity to deliver a sustainable, attractive and distinctive residential development which will deliver new homes to help meet the local housing needs and the wider housing market area. The site is located on the northern edge of Wolverhampton, to the north of Linthouse Lane and south of Blackhalve Lane. The majority of the site is located within South Staffordshire District, however, the proposed accesses from Linthouse Lane and Kitchen Lane are within Wolverhampton City. The site is currently located within the Green Belt and is surrounded on three sides by existing residential development. The site has good access to Wolverhampton via a number of vehicular, public transport and pedestrian connections.

1.2 Taylor Wimpey is a national and respected housebuilder who is committed to working with South Staffordshire District Council, in conjunction with Wolverhampton City Council

and the local community, to design a quality and sympathetic development which delivers social, environmental and economic benefits for the wider area.

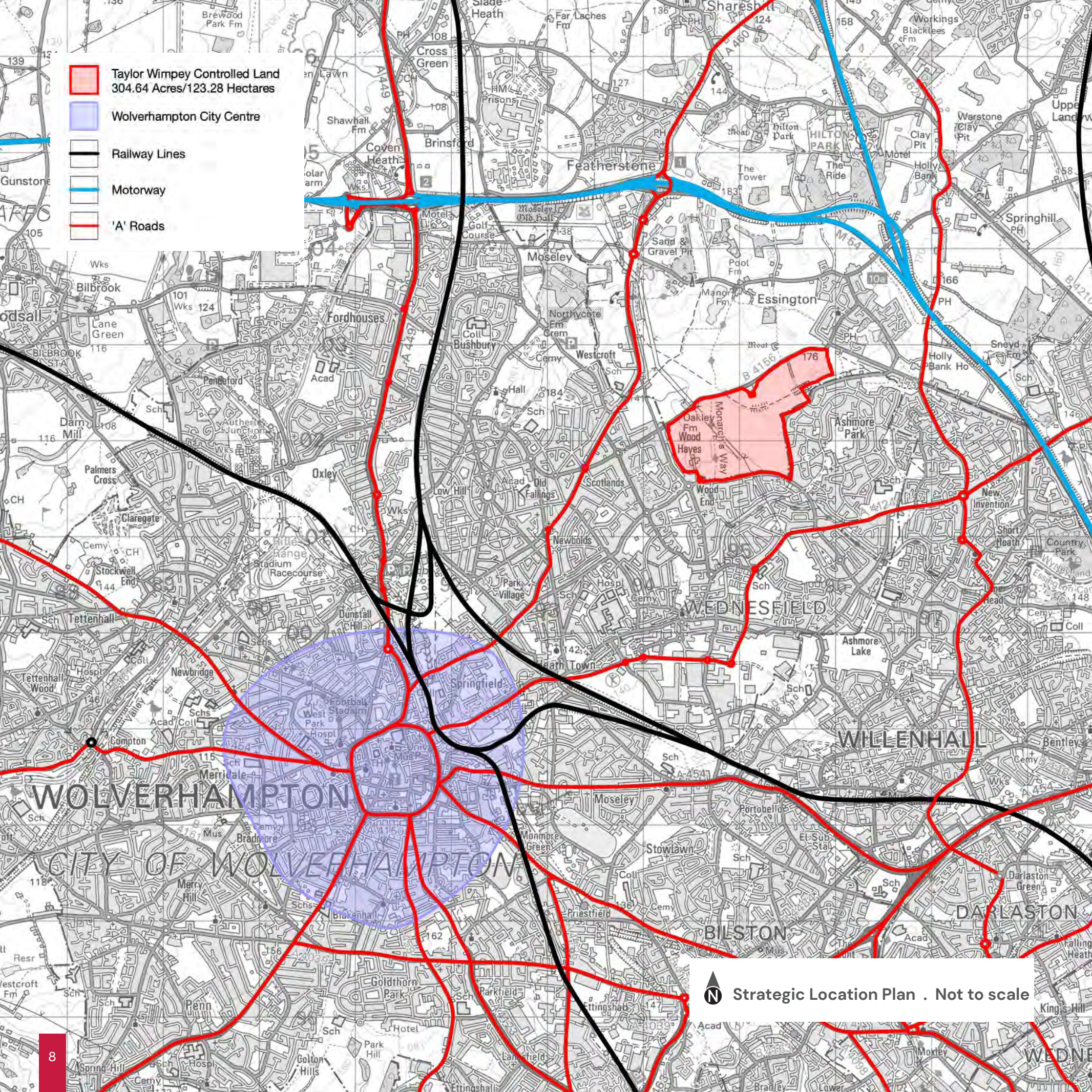
1.3 This document provides a vision for the development of a sustainable residential proposal with significant areas of public open space and other supporting infrastructure. It explains the technical work that has been carried out by Taylor Wimpey to inform our initial development vision for the site and forms the basis for more detailed consultation with South Staffordshire District Council, other key stakeholders and the local community to refine the proposals as appropriate.






1.4 Taylor Wimpey is one of the UK's leading housebuilders, being responsible for the delivery of over 10,000 homes annually. Taylor Wimpey is committed to engaging with local communities to shape developments which best meet local needs and requirements. Further details of our company are set out in Appendix 1.

1.5 Taylor Wimpey has appointed a consultant team to assist in producing an appropriate vision for the site. The principal team members comprise Pegasus Group (Planning, Master planning and Landscape Consultants), BWB Consulting (Noise, Utilities, Air Quality, Flood Risk and Drainage), EDP (Arboriculture, Ecology and Heritage) and DTA Transport Consultants (Transport).

1.6 This document includes the following sections:

- Section 2 – The Site & Surrounding Area**
- Section 3 – Policy Background**
- Section 4 – What is the Vision for the Site?**
- Section 5 – Site Analysis**
- Section 6 – The Proposal**
- Section 7 – Conclusion**



-  Taylor Wimpey Controlled Land
304.64 Acres/123.28 Hectares
-  Wolverhampton City Centre
-  Railway Lines
-  Motorway
-  'A' Roads

 Strategic Location Plan . Not to scale

THE SITE & SURROUNDING AREA

2.1 Whilst the majority of the site is located within South Staffordshire District, it lies immediately adjacent to the Black Country city of Wolverhampton. The adopted Black Country Core Strategy (2011) identifies Wolverhampton as a Strategic Centre, along with Brierley Hill, Walsall and West Bromwich. As such, Wolverhampton is a sustainable location for development and a focus for growth and investment.

SITE CONTEXT AND LOCATION

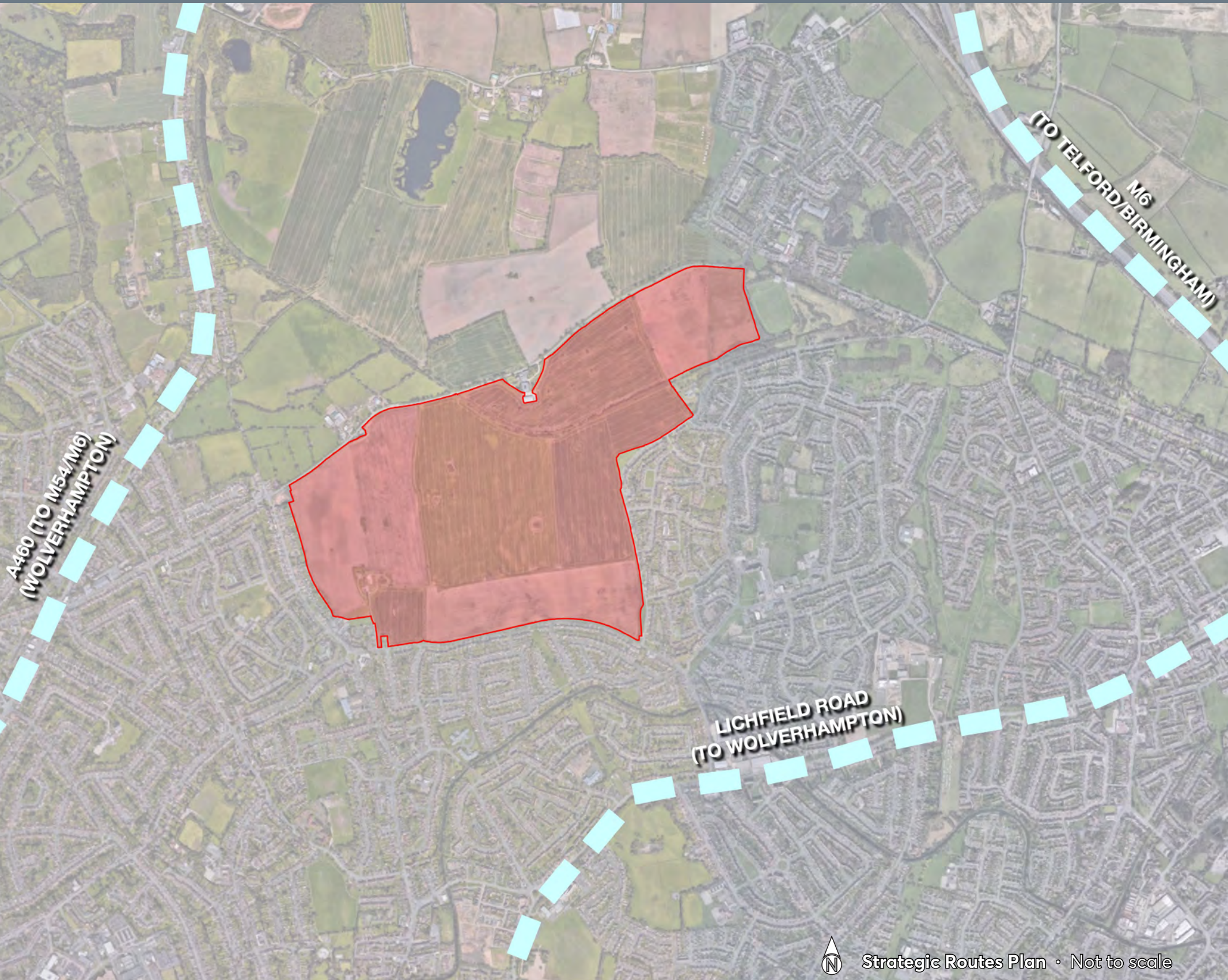
2.2 The site benefits from numerous potential vehicular and pedestrian access points connecting the site to the wider area, including Linthouse Lane to the south, Kitchen Lane to the east and Blackhalve Lane to the north. Wolverhampton railway station is located approximately 4km to the south-west of the site, whilst Bloxwich and Bloxwich North stations are located approximately 4km to the east. These stations provide access to a variety of local and national destinations including; Birmingham, London, Manchester, Liverpool, Bristol, Edinburgh and Glasgow. There are a number of bus stops to the south of the site on Linthouse Lane, providing services between Bilston, Walsall, Willenhall, Pendeford and Wolverhampton.

2.3 A Public Transport strategy will be developed as part of the proposals through consultation with the local highway authorities and stakeholders. The strategy will identify opportunities to enhance existing bus services and provided a new service between the development and key destinations and facilities.

2.4 Overall, there is significant opportunity to travel by public transport to Wolverhampton and beyond.

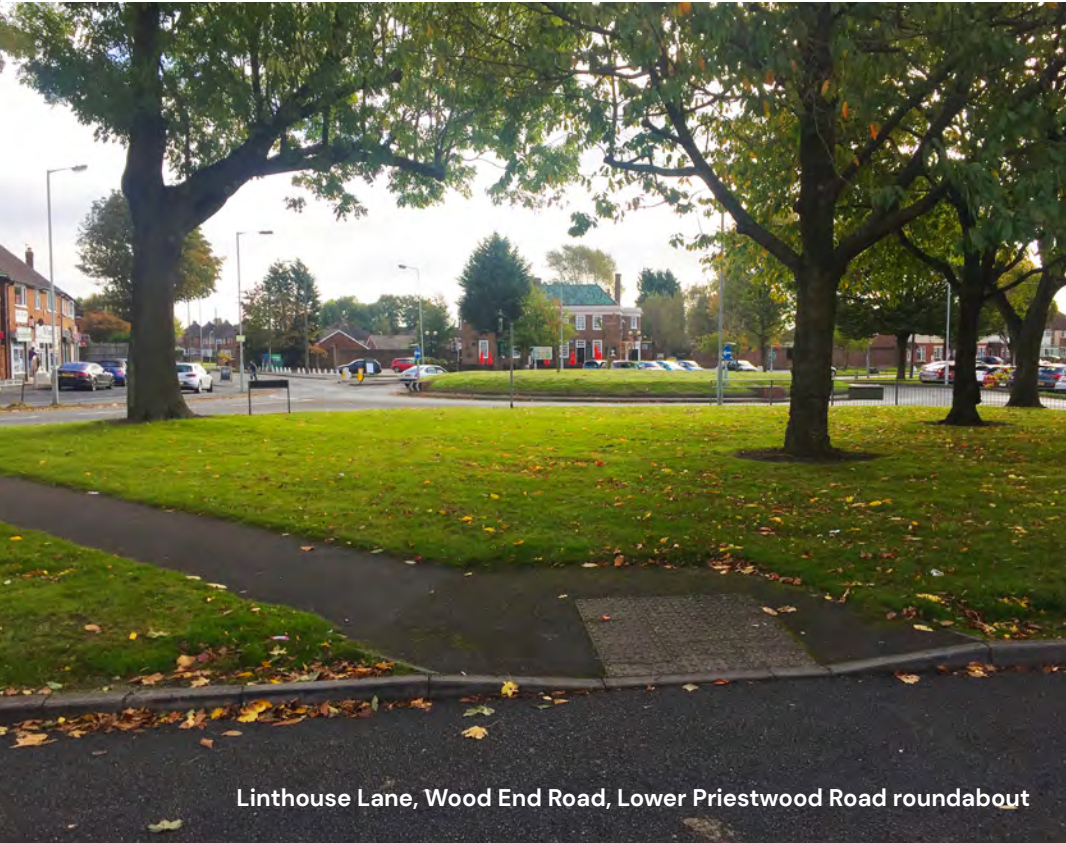
2.5 Wolverhampton itself is a historic settlement, founded in the 10th century by Lady Wulfrun. Wolverhampton is recorded in the Domesday Book in 1086 as being in the county of Staffordshire.

2.6 The settlement historically grew as part of the woollen trade, followed by coal and iron industry. A large number of council houses were constructed in Wolverhampton following the First and Second World Wars, with a number of flats and apartments being constructed in the 1960s. The area immediately surrounding the site is characterised by more modern semi-detached housing.



Strategic Routes Plan • Not to scale

PHOTOGRAPHS OF THE SITE AND ADJOINING ROADS/INFRASTRUCTURE



Linhouse Lane, Wood End Road, Lower Priestwood Road roundabout



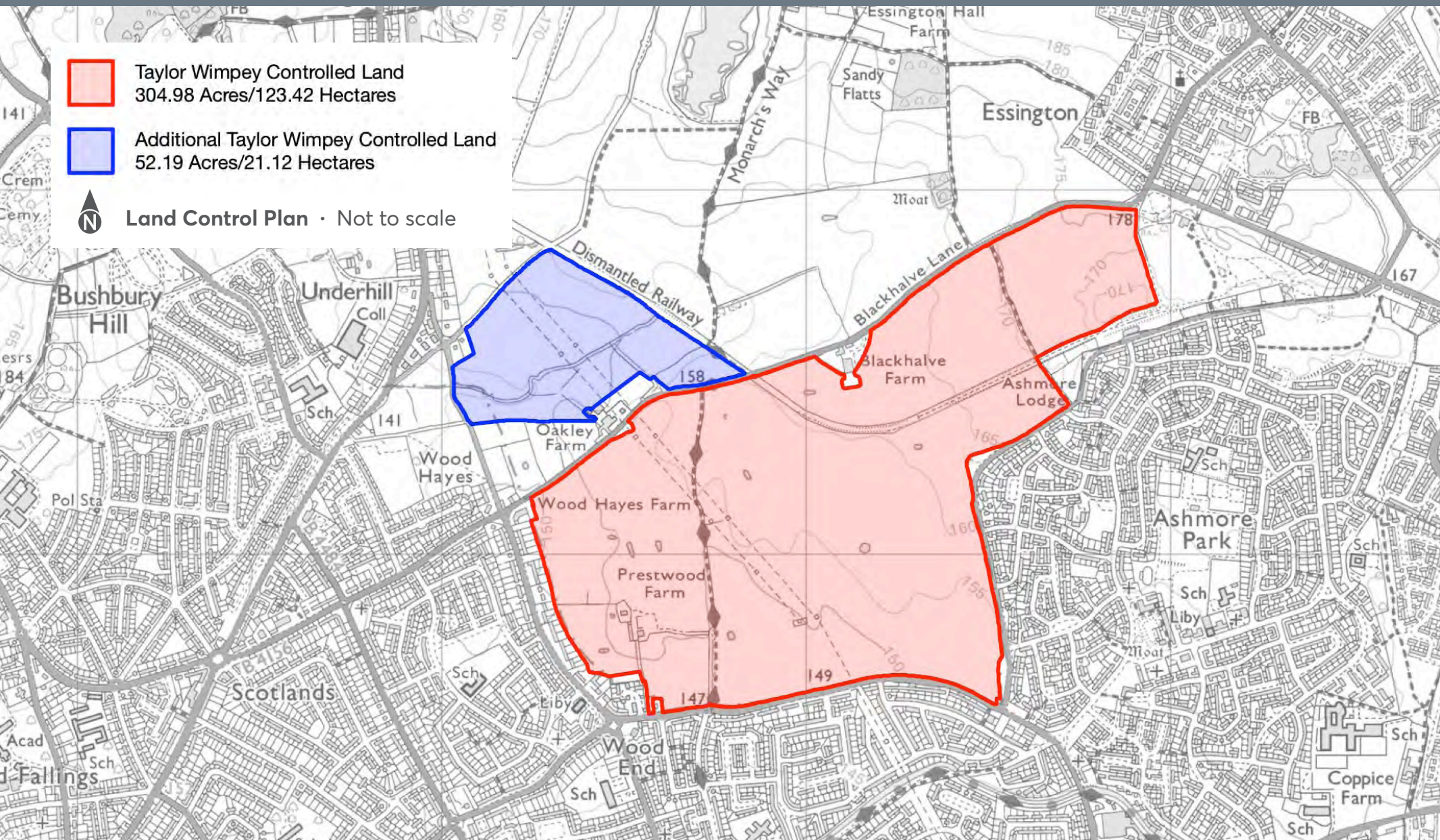
View East, Linhouse Lane



Public right of way running between Blackhalve Lane and Linhouse Lane



Kitchen Lane



LAND CONTROL

- 2.7 The site, edged in red (above), comprises approximately 128ha of agricultural land to the north of Wolverhampton. It is well-contained by existing residential development to the east, south and west, with the northern boundary predominantly comprising Blackhalve Lane.
- 2.8 The site is crossed by an existing Public Right of Way (PRoW) running north-south from Blackhalve Lane to Linthouse Lane and a dismantled railway walk in the north-eastern corner.
- 2.9 The land to the north of the dismantled railway is included within the proposed allocation but retained within the Green Belt.
- 2.10 Taylor Wimpey also controls additional land to the north of Blackhalve Lane (shown

edged blue above) which is bounded by Old Hampton Lane to the north, Wood Hayes Road to the west and the dismantled railway to the east. The western most part of the land lays within Wolverhampton City administrative boundary and forms part of the proposed Fallings Park allocation in the [now collapsed] Black Country Plan.

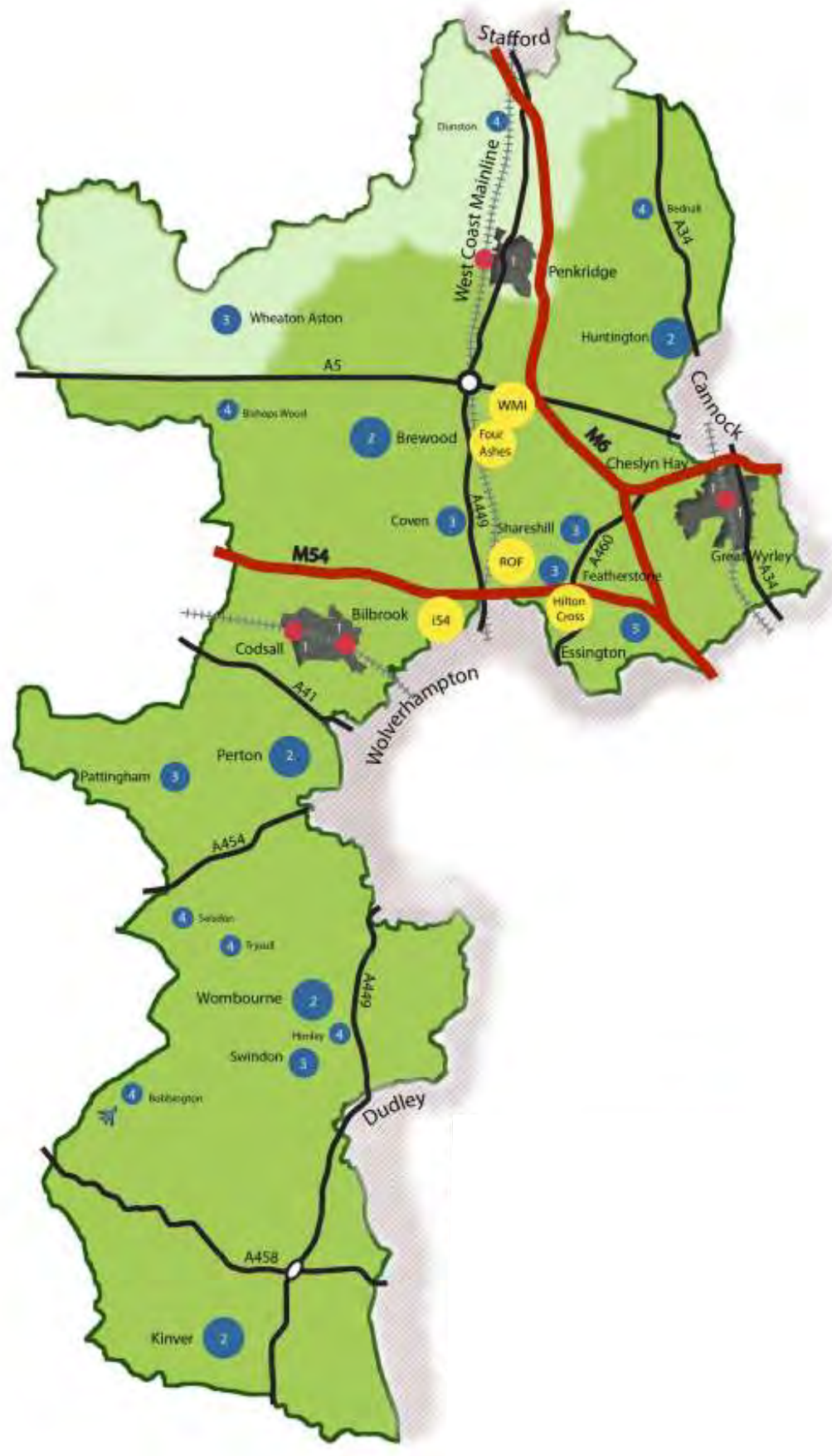
- 2.11 The land has previously been promoted for development along with the Site but remains outside of the proposed allocation and remains within the Green Belt.

SURROUNDING AREA

- 2.12 As previously stated, the site is surrounded residential development to the west, south and east, comprising a range of housing styles and appearances.

VIEW AROUND THE SITE BOUNDARIES TO THE SOUTH





N South Staffs Local Plan Review Context Map
 • Not to scale

POLICY BACKGROUND

NATIONAL PLANNING POLICY

- 2.1 A revised National Planning Policy Framework (NPPF) was introduced in July 2021. The Government recognises that the planning system should be genuinely plan-led, with succinct and up-to-date local plans providing a positive vision for each local authority; a framework for addressing housing needs and other economic, social and environmental priorities that span a minimum 15 year period from adoption.
- 2.2 The NPPF requires local authorities to identify a sufficient amount and variety of land, that can come forward where it is needed, to support the Government's aim of significantly boosting the supply of homes. To determine the number of homes needed a local housing need assessment is required, conducted using the 'standard method.' This standard method identifies a housing need for South Staffordshire District of 241 dwellings per annum, including an uplift to take account of market signals and affordability.
- 2.3 Similarly, the standard method indicates that, collectively, the four Black Country authorities are obliged to deliver 4,000 dwellings per year, including a 35% uplift applied to the City of Wolverhampton.

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW

- 2.4 The current development plan 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.


- 2.5 Taylor Wimpey 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 2039. 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.
- 2.6 The Preferred Options version of the Local Plan Review identified Land at Linthouse Lane as a Strategic Development Location (SDL). This SDL was identified as a location for major housing growth comprising a minimum of 1,200 homes, a community hub (to include local convenience store, commercial floorspace and flexible community space), new primary school, community park and sports pitches to serve existing and new residents.

MASTERPLANNING APPROACH

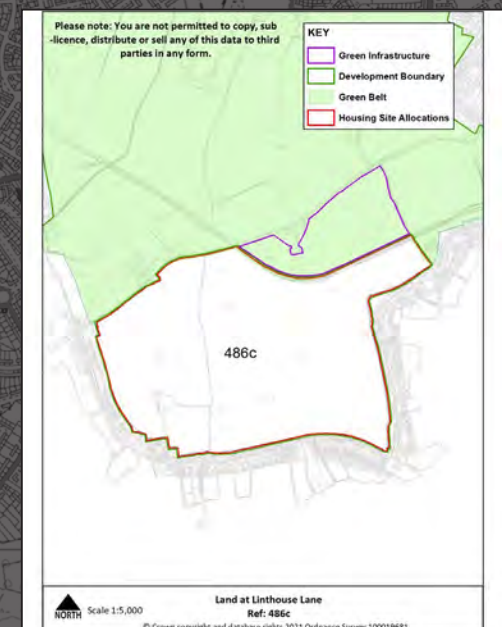
- 2.7 Since Land at Linthouse Lane was identified as a Strategic Development Location in the Preferred Options document, Taylor Wimpey has worked collaboratively with the Council, the Council's masterplanning consultant and a range of key stakeholders to progress a Vision, Objectives and Concept Masterplan to underpin a Development Framework Plan contained within this Vision Document.
- 2.8 In line with draft Policy MA1, Taylor Wimpey is committed to preparing a strategic masterplan through further stakeholder and community engagement to inform the preparation of a planning application in due course.

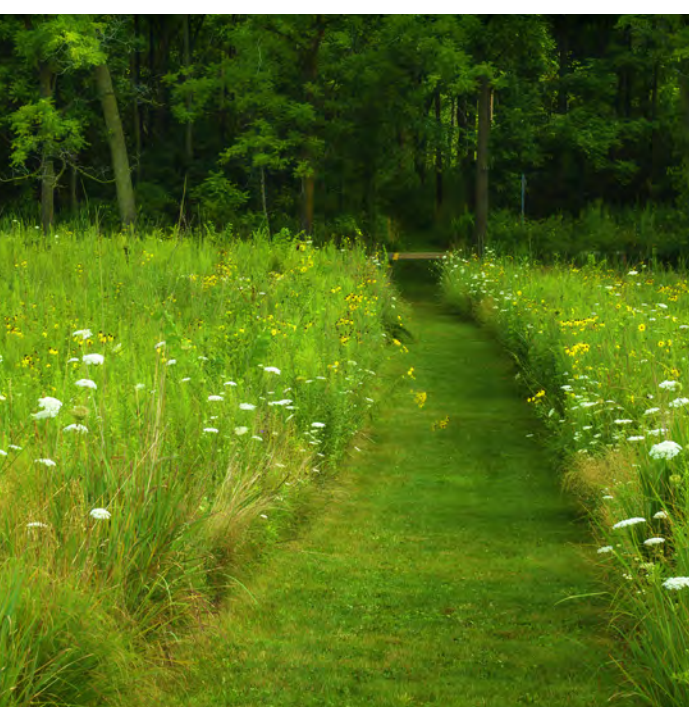
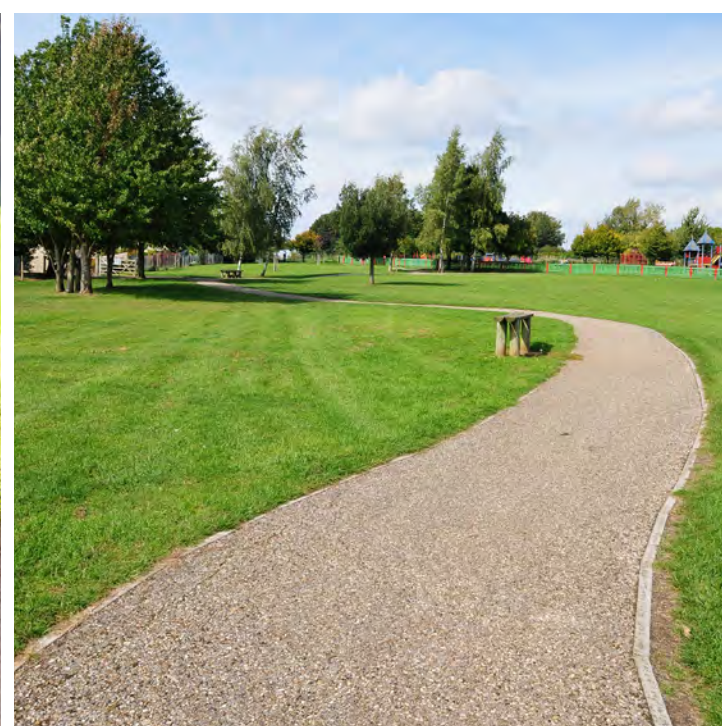
South Staffordshire Council

Local Plan
Preferred Options
November 2021



Further information can be found at www.sstaffs.gov.uk





WHAT IS THE VISION FOR THE SITE?

- 4.1 Taylor Wimpey is committed to delivering high quality schemes which create strong communities that are integrated into their surroundings.
- 4.2 The masterplanning process to date has identified the following Vision and Objectives which are to inform a new high quality, sustainable new development at Land North of Linthouse Lane.

"The development north of Linthouse Lane will be distinctively different, landscape led, sustainable neighbourhood, forming a beautiful new edge to both the Wolverhampton urban area and the Staffordshire countryside to the north. It presents an opportunity to use innovative designs and patterns of development, to create variety and distinctiveness whilst respecting the character of the established residential areas that surround it.

The development's location and strong links to Wolverhampton will provide easy and sustainable access to a wide range of services in the nearby areas of Ashmore Park and Wood End. The new neighbourhood centre will be at the heart of the new community, meeting the

day-to-day retail and service needs of residents allowing them to come together around a primary school and community hub within attractive and active green space.

The neighbourhood will be defined by a strong green infrastructure network, providing a variety of green, multi-functional links focussed towards the new community park and associated facilities, which will be a fantastic leisure opportunity for both residents of the neighbourhood and those living nearby.

The development will focus on achieving high environmental standards, energy efficiency and a regulated net zero carbon community."

ENVIRONMENTAL OBJECTIVES

Transport & Movement

- The new settlement will be highly permeable and prioritise active travel and walkable neighbourhoods, with a safe and secure hierarchy of connected streets and routes including strong cycling and walking infrastructure throughout the site and beyond.
- Connections with and improvements to sustainable travel infrastructure such as improvements to the local footpaths and cycleways.
- All streets to be connected, safe and secure as part of an overall site wide movement framework.

Housing & Built Environment

- Defined character areas will be created within the site, seeking to respond to the existing physical surroundings/context of the site and the movement framework/hierarchy.
- Provide a high quality, well-designed and innovative housing mix to create a balanced community and accommodate a range of people from first time buyers, young families and the elderly.
- Inclusion of a variety of building forms relevant to specific character areas (not high rise). Buildings will be well insulated and energy efficient with potential to utilise modern methods of construction and provide opportunities for self-build.

Environmentally Sensitive

- A high-quality site wide network of integrated green infrastructure, including existing environmental assets, natural capital corridors and SuDS, will enable connectivity and sustainable movement, mitigate and utilise flood zones and contribute over 10% net gain in biodiversity.
- Landscape led design which incorporates large areas of public open space to soften hard infrastructure and promote biodiversity corridors throughout the development.
- A new Country Park will be provided to the north east of the site and connected to the wider green infrastructure and movement network.

ECONOMIC OBJECTIVES

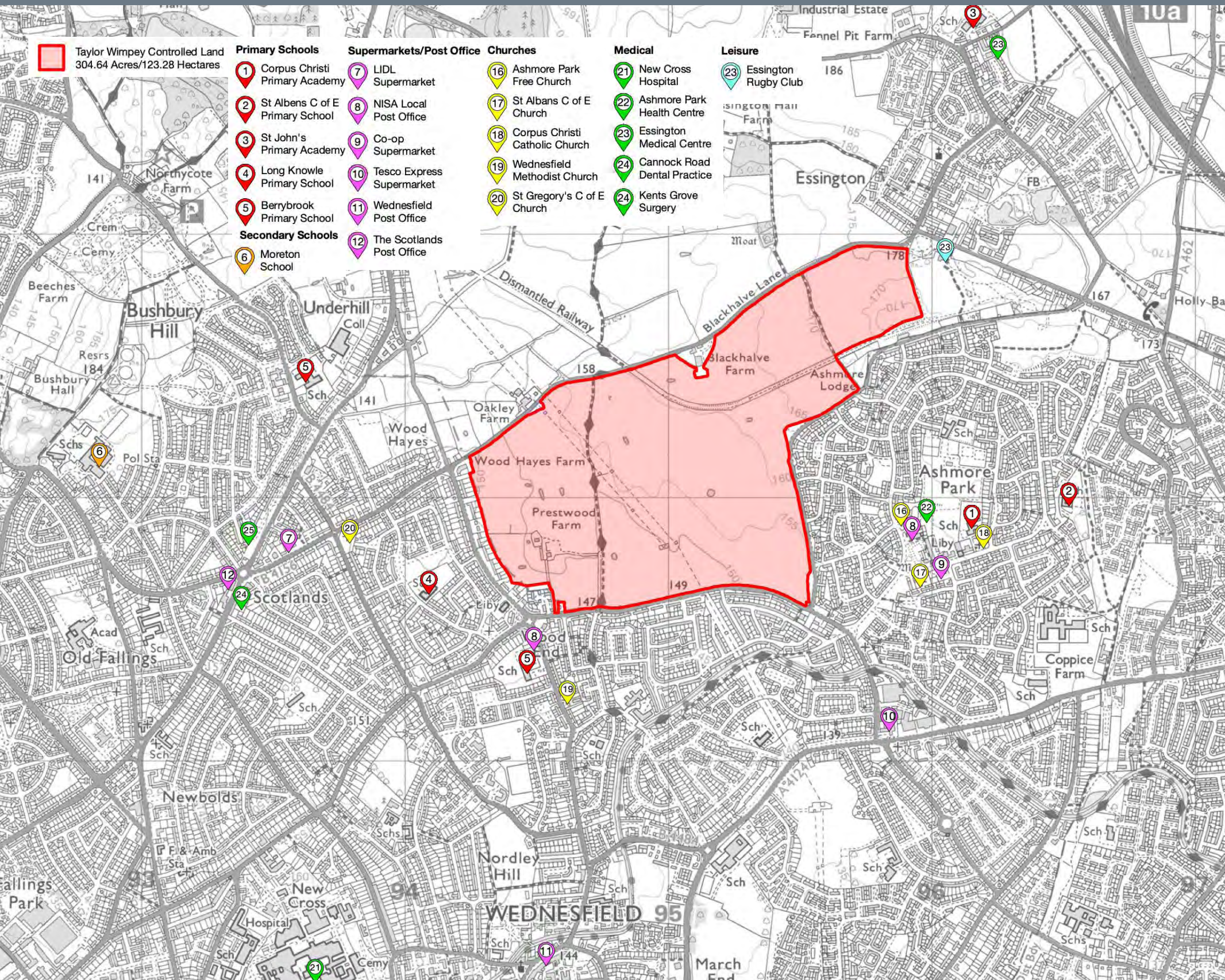
Well Served & Thriving

- The provision of a community hub will be provided centrally to the development which will serve both new residents and residents of the surrounding area. The community hub is proposed to include a local retail, other commercial floorspace and flexible community space.
- A two form primary school will also be provided at the heart of the development to ensure it is accessible to all.

SOCIAL OBJECTIVES

Active, Inclusive & Safe

- Active travel will be prioritised throughout the settlement to encourage walking/cycling whilst also reducing the risk of air pollution from traffic within the site.
- A range of suitable homes will be provided to meet established needs in respect of size, type, tenure and affordability in order to realise a balanced community.
- Provision of flexible community and commercial space will allow opportunities for future residents to meet and organise a range of activities and groups as required.
- The inclusion of communal gardens and informal spaces will help promote a sense of community and social inclusion.



SITE ANALYSIS

A SUSTAINABLE LOCATION

- 5.1 The site is situated on the northern edge of Wolverhampton and forms a logical extension to the City. Wolverhampton is a sustainable location for development, with the City benefits from an extensive range of services and facilities. The site itself is well related to the City and has good access to services as well as the City Centre.
- 5.2 In terms of sustainable access, the site is well located to take advantage of existing and proposed foot, cycle and public transport services in the local area. Opportunities for maximising connectivity between the proposed development and the local area are discussed in this report and would need to be revisited in detail at the appropriate stage.

- 5.3 Wolverhampton railway station is located approximately 4km west of the site, whilst Bloxwich and Bloxwich North stations are located approximately 4km to the east. These stations provide access to a variety of local and national destinations including Birmingham, London, Manchester, and Bristol. There are a number of bus stops to the south of the site on Linthouse Lane, providing services between Bilston, Walsall, Willenhall, Pendeford and Wolverhampton.
- 5.4 The development proposals include a wide range of new services and facilities to reduce the need to travel.

SUSTAINABILITY BENEFITS

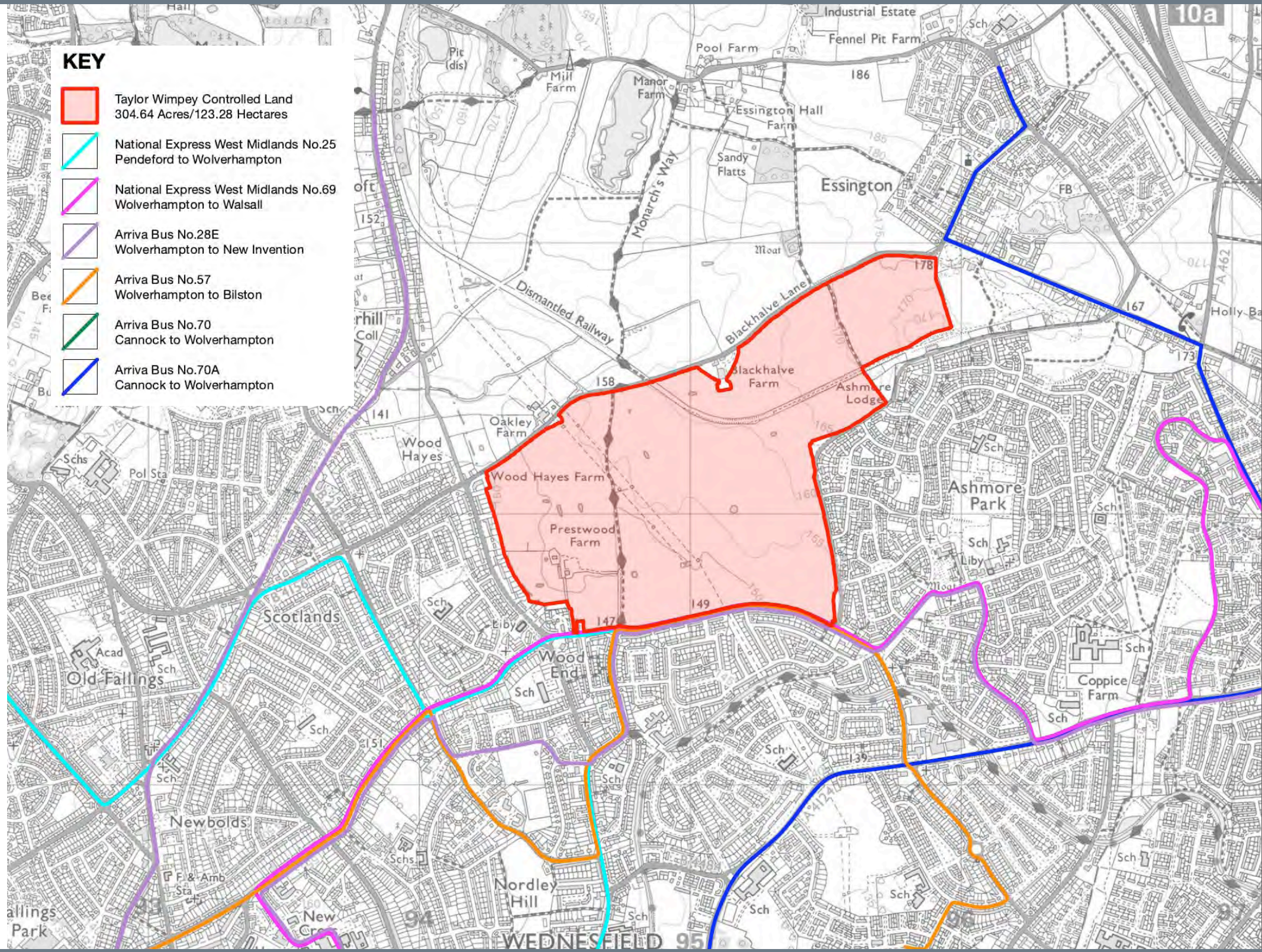
- 5.5 The site will deliver significant benefits in relation to the “three dimensions” of sustainable development as set out in the NPPF.

TECHNICAL ASSESSMENTS

- 5.6 Taylor Wimpey carried out various baseline technical assessments including highways, flood risk, heritage, ecology, arboriculture, noise, ground conditions, utilities and agricultural land classification. Summaries of the key findings and recommendations are to be found on the following pages.

KEY

-  Taylor Wimpey Controlled Land
304.64 Acres/123.28 Hectares
-  National Express West Midlands No.25
Pendeford to Wolverhampton
-  National Express West Midlands No.69
Wolverhampton to Walsall
-  Arriva Bus No.28E
Wolverhampton to New Invention
-  Arriva Bus No.57
Wolverhampton to Bilston
-  Arriva Bus No.70
Cannock to Wolverhampton
-  Arriva Bus No.70A
Cannock to Wolverhampton





HIGHWAYS AND TRANSPORTATION

- 5.7 Access to the site can be achieved from a number of locations, including from Linthouse Lane to the south, Kitchen Lane to the east and Blackhalve Lane to the north, as shown on the Indicative Masterplan.
- 5.8 The existing highway network has good visibility in these locations and the required visibility splays could be achieved through minor highway works and widening.
- 5.9 Internally, the site would include a principal spine road in conjunction with a number of primary and secondary streets.
- 5.10 As stated previously, the site is well related to Wolverhampton railway station, as well as Bloxwich and Bloxwich north. There are bus stops adjacent to the site on Linthouse Lane and there will be a requirement for public transport improvements to be delivered as part of any future development of the site. This could include introducing new bus stops on the surrounding road network or by relocating existing bus stops. Furthermore, the layout of the site would be designed to accommodate access by buses to provide future flexibility in terms of public transport provision.
- 5.11 Various nearby facilities are considered to be within a reasonable walking distance from the site. The site is sustainable in terms of access by walking and cycling to local facilities and accessibility to public transport services.
- 5.12 A Transport Assessment will be completed to assess impacts across the wider network, this will include speed survey work. The Transport Assessment will take account of any local committed development sites and any committed highway improvements.
- 5.13 Suitable mitigation will be provided as part of the development proposals including any identified off-site highway works and contributions.

FLOOD RISK

- 5.14 Based on the Environment Agency flood maps, the development site lies in Flood Zone 1 and therefore all land uses are sequentially acceptable.
- 5.15 The Environment Agency surface water maps show low to high accumulations within the site and along existing watercourse and ditch routes. Issues associated with overland flow and surface water flooding can be dealt with as part of a site-specific Flood Risk Assessment and mitigation measures including cut off ditches and French drains to intercept flows and the raising of finished floor levels may be required.
- 5.16 A site-specific hydraulic modelling exercise has been undertaken to assess flood risk to the site. Post-development options testing is proposed in the form of culvert removal and additional landscaping to manage the floodplain within the site.

DRAINAGE

- 5.17 Percolation testing will be undertaken across the site in due course, however at this stage it is considered above ground attenuation features will be required. Detention basins and swales will be provided across the site, in order to treat surface water as close as possible to the source.
- 5.18 Attenuation will be provided to restrict the surface water run off to greenfield rate for up to a 1 in 100 year + 40% climate change storm event. The drainage strategy will be refined through the Strategic Masterplanning process.
- 5.19 The development area has the potential to drain by gravity to a number of the public foul sewers located within Linthouse Lane. Detailed investigations with Severn Trent Water will take place in due course to confirm capacity requirements. In any event and in accordance with the Water Industry Act (1990), Severn Trent Water will be required to provide capacity for the development whilst containing environmental impacts and maintaining water quality; therefore, improvements to the network will be provided if required.



Figure 1: View north towards Moat Farm scheduled monument from Blackhalve Lane (PRoW to right of view). The scheduled monument is entirely obscured by trees and thick vegetation. The Site lies to the south on the opposite site of Blackhalve Lane and behind further hedgerows.

HERITAGE & ARCHAEOLOGY

- 5.20 The Site does not contain any designated heritage assets (as defined in Annex 2 of the NPPF). The closest such asset is the scheduled monument of Moat Farm, c. 160m to the north of the Site (Figures 1–3). It survives as substantial overgrown earthworks, described in the schedule as a raised wooded island, surrounded by a predominantly waterlogged moat with a causeway on the eastern side. The foundations of a cottage and outhouse, destroyed in 1940, are described as having been located within the moat, which the Staffordshire Historic Environment Record (HER) describes as being of late post-medieval date. The moat was partly infilled by waste tipping in the early 1980s.
- 5.21 The monument itself is currently well screened by trees within and surrounding it. Land within the Site is partially visually separated from the monument and has no obvious connection with it other than as part of the wider relatively undeveloped agrarian landscape. However the development would likely be visible from the monument, and would increase the degree of built form in views from the monument, although over some distance through filtered views.
- 5.22 Development within the Site, unmitigated, could therefore have an effect on the setting of the moated site, although this would represent an incremental contextual change to the surrounding agrarian landscape, rather than any change to elements of the setting of the monument which are key to its heritage significance. There is also some potential for design measures, such as additional screening along Blackhalve Lane, to be incorporated into any development design and thus effectively mitigate any impact on the scheduled monument.
- 5.23 Whilst this asset will require a full setting assessment in due course, given its separation from the Site and overgrown nature, as well as the flatness of the topography, there is currently every reason to believe that careful masterplanning would minimise or avoid any effect on this asset from a development of the Site. As such, it is considered unlikely that this monument would form a substantial constraint to either the deliverability or capacity of the Site.
- 5.24 Otherwise, all other assets are located more distantly, being located c.900m from the Site. There are two conservation areas within 1.5km of the site, comprising Bushbury Hill, some 1.2km to the north-west of the Site, and a very small conservation area on Cedar Way, some 660m to the south. The latter contains three buildings recorded on the City of Wolverhampton Council local list of buildings (albeit these are classified as non-designated heritage assets and carry less weight in decision making than listed buildings). There are two Grade II listed and eleven locally listed buildings in the wider area. These assets comprise a mixture of mostly residential dwellings, public houses and farmsteads. There are also war memorials, a windmill base, a former school, and a millennium monument. Most are dated to the 19th–20th centuries. Whilst a full heritage setting assessment will be required in due course, current research suggests that the Site does not form part of their setting and does not contribute to their significance. These assets are therefore considered not to form a constraint to the deliverability or capacity of the Site.
- 5.25 With regard to non-designated heritage assets, there are three archaeological monuments or features recorded within the Site in the Staffordshire or Wolverhampton Historic Environment Record (HER). These include a moated site, most likely medieval in date, localised to a small portion of the south-western part of the Site to the east of Prestwood Farm (Figure 3). No further details are recorded on the HER, however, this feature was visible as a cropmark on aerial photographs dating back to the 1950–70s. No above ground remains of the moated site survive today and the moated site has been infilled and is overgrown. Whilst further research of this feature may be required in due course, given the overall size of the Site, there is every reason to believe that its retention, should this be desirable, could easily be accommodated whilst not prejudicing the overall capacity of the Site.
- 5.26 Other than this, the Site appears to have been in agricultural use since at least the medieval period as evidenced by the identification of ridge and furrow adjacent to the Site boundary. Outside of the moated site, the potential for archaeological remains of medieval date to be present within the Site, other than those of negligible value associated with agricultural activity, is assessed as low.
- 5.27 There are remains of a dismantled mid-19–early 20th century railway bisecting the Site, and the former post medieval Ashmore cottages in the north-eastern part of the Site, which are identified in historic mapping. Should any below ground remains associated with these features survive, given their more recent date and likelihood of truncation from modern ploughing, they are likely to be of no more than negligible archaeological interest.
- 5.28 Whilst the Site may require fieldwork investigation in due course to clarify its potential, there is no suggestion from the sources consulted for this initial assessment that it would contain buried remains of such significance that they would form a substantial constraint to its capacity or inhibit its overall deliverability.



Figure 2: View south along PRoW from Moat Farm scheduled monument 'driveway' towards Blackhalve Lane and the Site. The Site lies to the south beyond Blackhalve Lane, but is obscured by intervening trees, vegetation, and hedgerows.



Figure 3: The medieval moated site is recorded as being located to the east of the Prestwood Farm (the red brick building visible behind trees in the image), which is to the left of the red brick house in this image. There are no visible remains today of the medieval moated site, and it appears to have become overgrown and infilled since it was noted in aerial photographs from the 1950s-70s.



The improved grassland in the northwest of the Site



The stream in the northwest section of the Site



The arable nature of the Site



The stream in the north western extreme of the Site



Giant hogweed on the Site

ECOLOGY

5.29 An ecological desk study and Extended Phase 1 survey of the Site have been completed to inform the promotion of the Site.

5.30 No part of the Site is covered by any statutory ecological designations, however, there are four such designations within the Site's zone of influence (Zoi). The Site falls within the 15km Zoi of Cannock Chase SAC and must therefore ensure that potential indirect impacts as a result of increased recreation are avoided through the provision of appropriately designed alternative natural green recreational space within the development layout.

5.31 Four non-statutory designated sites were identified within the Sites Zoi with Ashmore Lodge Biodiversity Alert Site (BAS) of most relevance, which comprises a dismantled railway running through the Site, lined with trees and scattered scrub, with some parts covered in semi-improved grassland. Inherent mitigation has been incorporated into the layout from the outset, incorporating this feature into the proposed open space and providing a wide green buffer from the proposed development. Opportunities exist to enhance the habitats in the long-term.

5.32 The Site predominantly comprises arable land, which is considered to be of limited/negligible ecological importance though habitats of higher importance are present including a network of hedgerows and ponds, as well as the habitats associated with the dismantled railway discussed above including scattered trees, scrub, tall ruderal, and semi-improved grassland. An initial Biodiversity Impact Assessment (BIA) has indicated that the proposed scheme detailed within the Development Framework Plan is capable of achieving a biodiversity net gain of over 10% for both area habitats as well as hedgerows.

5.33 The habitats have the potential to support assemblages of birds, bats, badgers, amphibians, reptiles and invertebrates, with further survey work recommended to inform any future planning application. Given the opportunities to retain, enhance and create areas of ecologically valuable habitat within the Site, it is considered that any potential impacts on protected species can be avoided, with any medium to long-term impacts mitigated for through the creation of areas of higher ecological value within areas of public open space and wider naturalised green space.

5.34 Overall, it is considered that there are no significant 'in principle' constraints to the future development of the Site, which cannot be avoided through implementation of sensitive design, enabling the retention of sensitive habitats and features. There is the potential for future development to deliver biodiversity net gain through enhancement of existing locally valuable habitats, including hedgerows, combined with new landscape planting to maintain and enhance Green Infrastructure assets which are present across the Site and provide new opportunities for protected species. Sensitive development of the Site is therefore considered to be capable of meeting national and local planning policy and wildlife legislation requirements.



Scattered mature trees across the arable field parcels sandwiched between Blackhalve Lane and the dismantled railway line give an almost parkland character to this area alongside Blackhalve Farm. Mature vegetation of the dismantled railway is seen to wrap around the image to the right.



View into the fields to the north-west of Blackhalve Lane, presenting a contrastingly well-treed and contained character when compared to the southern field parcels.

ARBORICULTURE

5.35 EDP has undertaken two walkover tree surveys of the site, the first in 2017 and the second in 2022. These surveys were undertaken broadly in accordance with BS5837:2012 Trees in Relation to Design, Demolition and Construction, their aim was to identify and record all trees within and adjacent to the Site that may be affected by or have the potential to influence the proposals.

5.36 The survey process recorded 78 individual trees and 14 groups of trees totalling 92 items. Of these 92 items, 15 have been category 'A', of high quality and value, 74 as category 'B', of moderate quality and value and 3 as category 'C' of low quality and value. A total of 11 species are supported across the study area, these comprise native and naturalised species and are considered typical of the rural setting, with oak, maple and hawthorn dominating the hierarchy.

5.37 The overall findings of the survey reflect the Site's current agricultural management, with the majority of surveyed items located around the periphery of the Site within the field boundary hedgerows.

5.38 To inform the masterplanning process foot protection areas for each item have been calculated using the methodology set out in BS5837:2012 Trees in Relation to Design, Demolition and Construction. Both Category A and category B items will be prioritised for retention, where practicable, within the masterplanning process. However, the default position shall be the retention of all items, where practicable, regardless of category grading as all trees provide positive environmental and ecological contributions, irrespective of their condition.

5.39 A future planning application will be supported by a comprehensive Arboricultural Assessment and will include an assessment of the developments impact upon the existing tree stock as we as making recommendations for additional tree planting.

5.40 The default position shall be the retention of all items, where practicable, regardless of category grading as all trees provide positive environmental and ecological contributions, irrespective of their condition.

5.41 A future planning application will be supported by a comprehensive Arboricultural Assessment and will include an assessment of the developments impact upon the existing tree stock as we as making recommendations for additional tree planting.



NOISE

- 5.42 The masterplan indicates how dwellings would be set back from main roads, including the proposed spine road. Furthermore, landscaping would be included throughout the development in conjunction with carefully orientated and sited dwellings to minimise noise impact and preserve residential amenity.
- 5.43 Consequently, it is unlikely noise will have a significant adverse impact on the development of this site.

GROUND CONDITIONS

- 5.44 The 1:50,000 British Geological Survey map for the area shows the entire site is underlain by superficial deposits of Glacial Till – predominantly cohesive but potentially variable and strata of varying geotechnical properties may be present. The solid geology across majority of the site comprises the Clent and Enville Formation – sandstones and mudstones (undifferentiated).
- 5.45 An assessment of contamination and gas migration on the site shows a low to moderate risk to residential end users and construction works. It is therefore considered unlikely that the site would be designated as statutory contaminated land by the local authority under the provision of Part IIA of the Environmental Protection Act 1990 (inserted by Section 57 of the Environmental Act 1995).

UTILITIES

- 5.46 Electricity cables including National Grid Extra High Voltage cables, 132kV and 11kV overhead cables are located within the site area. A number of these cables will be retained in situ, with suitable easements and diversions will be implemented where feasible and necessary.
- 5.47 Diversions for sewers, water and gas mains, BT and electric cables will be required to facilitate the proposed access points with a suitable payment made as required to facilitate these alterations.

AGRICULTURAL LAND CLASSIFICATION


























- 5.48 Natural England's Land Classification Map for the West Midlands Region (ALCO04) shows that the majority of the site comprises Grade 3 'Good to Moderate' quality agricultural land, with small areas comprising Grade 4 'Poor' quality land. It is noted that the majority of land around Wolverhampton also comprises Grade 3 agricultural land.
- 5.49 Further assessment will be required to ascertain the extent to which the site constitutes Grade 3a or 3b land.
- 5.50 A Landscape and Visual Baseline has been produced, to appraise the existing landscape and visual condition of the site and its context. This is based on site survey work and desk-based analysis.

LANDSCAPE

- 5.51 The site is not located within any nationally or locally designated landscape, nor does it lie within 3km of any such landscape. The site is located within Green Belt which does not assign value or quality to the landscape but relates to spatial planning of the landscape. A Green Belt Review has been undertaken as part of the Landscape and Visual Baseline.
- 5.52 Overall, it is considered that there are no significant 'in principle' landscape and visual constraints that cannot be avoided, mitigated or reduced through well-considered design. This is due to the low sensitivity of landscape character, the site's existing relationship with the settlement edge and the very limited extent of intervisibility between the site and the surrounding landscape. Development of the Site provides opportunity to retain, enhance, re-establish and integrate field hedgerows and tree components, and create new tree groups and woodland blocks through the undertaking of sensitive masterplanning, and appropriate management for longevity.




Site Constraints & Opportunities · Not to scale

	SITE BOUNDARY 304.64 ACRES / 123.28 HECTARES
	ADDITIONAL TAYLOR WIMPEY CONTROLLED LAND 52.19 ACRES / 21.12 HECTARES
	DRAFT BLACK COUNTRY PLAN STRATEGIC HOUSING ALLOCATION CSA.2
	WIDER LANDSCAPE CONTEXT
	EXISTING VEGETATION (INDICATIVE)
	WOODLAND/PARKLAND
	FIELD PATTERNS
	DITCH (INDICATIVE POSITION)
	ESTIMATED FLOOD ZONE FROM SURFACE WATER (INDICATIVE)
	LAKES, CANALS AND PONDS
	PUBLIC RIGHTS OF WAY
	DISMANTLED RAILWAY WALK
	VIEWS TOWARDS SITE FROM EXISTING BUILDINGS
	KEY VIEWS INTO THE SITE
	STREET VIEWS INTO THE SITE
	OVER HEAD CABLES
	OVER HEAD CABLES 20M OFFSET NO BUILD ZONE (INDICATIVE)
	UNDERGROUND CABLE
	SCHEDULED MONUMENT
	LOCAL FACILITIES (SHOPS, DOCTORS SURGERY, SCHOOL AND RECREATION)
	BUS STOP
	PRIMARY ROAD
	PUMPING STATION
	SLOPED LANDFORM
	AREA SUBJECT TO SHALLOW MINE WORKINGS INDICATIVE

SITE OPPORTUNITIES AND CONSTRAINTS

Opportunities

- An opportunity to create a vibrant, sustainable and well-connected development on the edge of the City of Wolverhampton.
- Opportunity to create a clear and legible movement hierarchy with clear distinction and way finding opportunities.
- Community primary school to be provided on site for new and existing residents.
- A central community hub will seek to provide future and existing residents with shopping and community pursuits.
- Creation of new public open spaces including a new Country Park which will provide occasions for new and existing residents to socialise and spaces to spend leisure time.
- Provide a range of housing that will meet the needs of local people.
- Creation of new leisure routes that will connect with the local infrastructure.
- Development will seek to remain existing green infrastructure and enhance where possible.






































Constraints

- The site is presently located within the Green Belt
- Overhead cables to be retained
- Proximity to scheduled monument of Moat Farm

5.53 The site benefits from a lack of any significant physical or environmental constraints and provides the opportunity to deliver housing development in a sustainable location which will integrate with existing built development and provide a soft transition to the surrounding countryside.



THE PROPOSAL

	SITE LOCATION 123.28 HECTARES 304.64 ACRES		POTENTIAL GRASCRETE EMERGENCY ACCESS		POTENTIAL TRIM TRAIL LOCATION
	PROPOSED SITE ACCESS		PRIMARY PEDESTRIAN/ CYCLE MOVEMENT		POTENTIAL LINK TO WIDER NATIONAL CYCLE INFRASTRUCTURE
	HIGH DENSITY DEVELOPMENT = 14.22 HA X 40 DPH = 569 UNITS		PRIMARY PEDESTRIAN MOVEMENT		EXISTING LANDSCAPE
	MEDIUM DENSITY DEVELOPMENT = 20.65 HA X 35 DPH = 723 UNITS		POTENTIAL PEDESTRIAN & CYCLE LINKS TO WIDER GREEN INFRASTRUCTURE		PROPOSED STRUCTURAL PLANTING
	LOW DENSITY DEVELOPMENT = 15.04 HA X 30 DPH = 451 UNITS		PUBLIC RIGHT OF WAY		COMMUNITY ORCHARD
	2 FORM ENTRY SCHOOL - 2.1 HECTARES		DISMANTLED RAILWAY WALK		WILDFLOWER PLANTING
	COMMUNITY HUB SPACE - 1.3 HECTARES POTENTIALLY CAN ACCOMMODATE RETAIL SPACE, FLEXIBLE WORKING, COMMUNITY HALL		ACTIVE TRAVEL ROUTE ON THE WYRLEY & ESSINGTON CANAL WITH LINKS BACK TO WOLVERHAMPTON CITY CENTRE		SUSTAINABLE URBAN DRAINAGE (TBC)
	PUBLIC OPEN SPACE (INCLUDING SUDS) PUBLIC OPEN SPACE BELOW THE DISMANTLED RAILWAY - 37.35 HA COUNTRY PARK - 18.14 HA GRAZING LAND - 12.49 HA		KEY FOCAL SPACES / JUNCTURES		EXISTING WATERBODIES
	6.75M WIDE PRIMARY STREET WITH TWO 2M VERGES, 2M WIDE FOOTPATH AND 3M CYCLEWAY		NEIGHBOURHOOD AREA OF PLAY		20M NO BUILD ECOLOGY OFFSET FROM TOP OF BANK (TBC)
	5.5 SECONDARY STREET WITH 2M WIDE FOOTPATHS		LOCALLY EQUIPPED AREA OF PLAY		OVERHEAD CABLE WITH 30M EASEMENT (TBC)
	4.8 TERTIARY STREET WITH 2M WIDE FOOTPATHS		NATURAL PLAY SPACE		POTENTIAL LOCATION FOR UP TO 3 FULL SIZE PITCHES OR 6 MINI PITCHES
	PRIVATE SPACES / SHARED SURFACE STREETS		INFORMAL KICK ABOUT SPACE		POTENTIAL LOCATION FOR CHANGING FACILITIES
			COMMUNITY ALLOTMENTS		

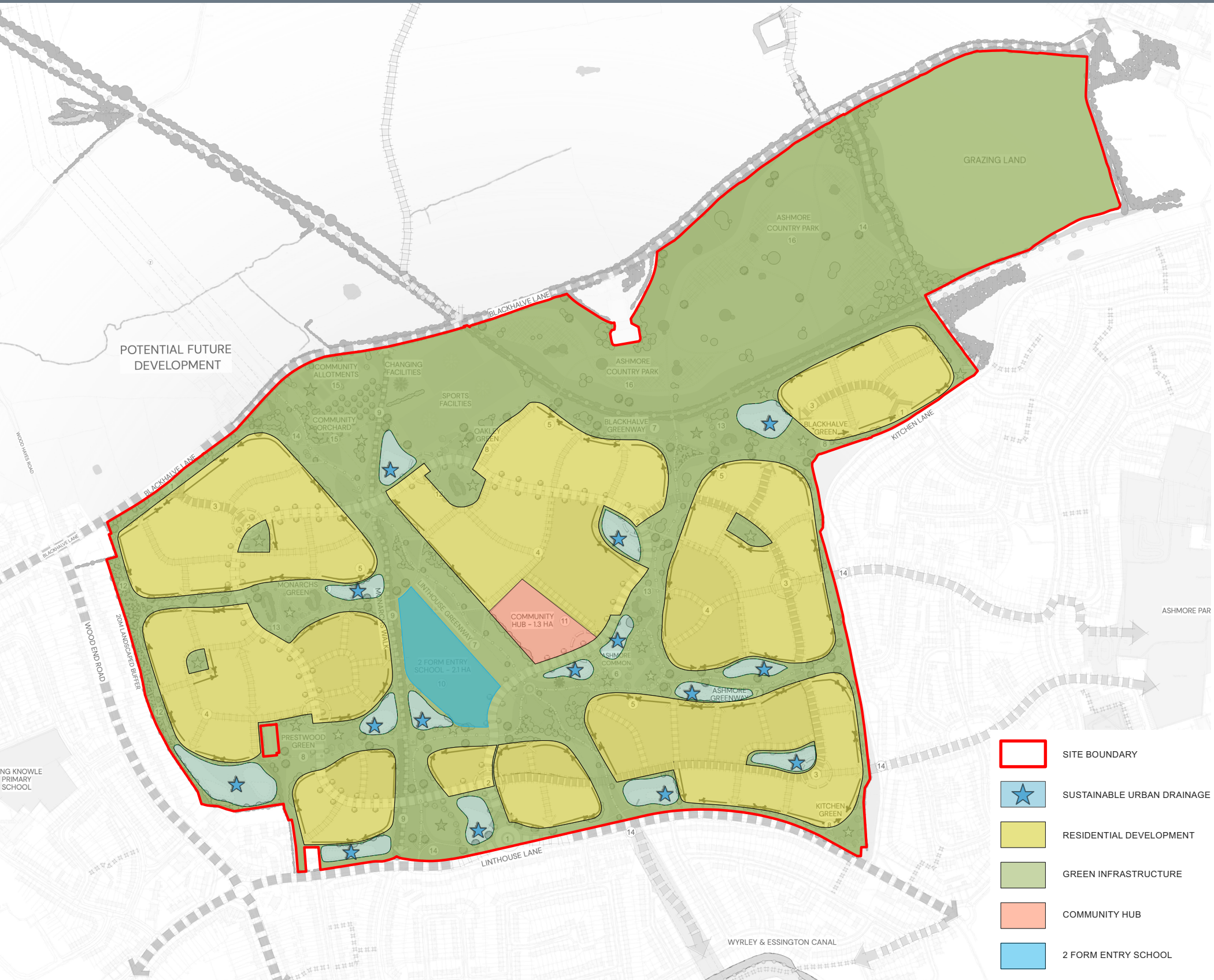
COMBINED
TOTAL
DEVELOPMENT
= 1743 UNITS

APPROACH

- 6.1 Taylor Wimpey has developed a Development Framework Plan which reflects the opportunities and constraints of the site and seeks to deliver the vision and objectives reached through the masterplanning process to date. This Masterplan will evolve further as a result of future consultations with South Staffordshire District Council, the local community and other key stakeholders.

KEY PRINCIPLES

1. PROPOSED VEHICULAR ACCESS VIA LINHOUSE LANE, KITCHEN LANE AND BLACKHALVE LANE;
2. PRIMARY VEHICULAR MOVEMENT THROUGH SITE;
3. LOOPED SECONDARY STREETS PROVIDING EMERGENCY LINKS BETWEEN PRIMARY MOVEMENT;
4. TERTIARY MOVEMENT SERVING SMALLER CLUSTERS OF DEVELOPMENT;
5. OUTWARD FACING DEVELOPMENT PROVIDING NATURAL SURVEILLANCE OVER PUBLIC OPEN SPACES;
6. CENTRAL GREEN "ASHMORE COMMON" PROVIDING A CENTRALISED GREEN SPACE PROVIDING AREAS FOR PLAY, SOCIALISING, EXERCISE AND COMMUNITY PURSUITS;
7. A SERIES OF GREENWAYS PROVIDING PUNCTUATION THROUGH DEVELOPMENT OFFERING OPPORTUNITIES FOR PEDESTRIAN/CYCLE PERMEABILITY;
8. CREATION OF RESIDENTIAL GREENS OFFERING A SPACE FOR EQUIPPED PLAY AND LANDSCAPED SPACES;
9. RETAINED PUBLIC RIGHT OF WAY - MONARCHS WAY PROVIDING NORTH-SOUTH MOVEMENT;
10. POTENTIAL LOCATION FOR 2 FORM ENTRY PRIMARY SCHOOL
11. POTENTIAL LOCATION FOR COMMUNITY HUB WITH LINKS BACK TO ASHMORE COMMON AND PROPOSED SCHOOL LOCATION;
12. ENHANCED OFFSETS TO EXISTING RESIDENTS ON WOOD END ROAD VARYING BETWEEN 20-25 WITH ADDITIONAL LANDSCAPING SCREENING;
13. EXISTING PONDS TO HAVE A 20M EXCLUSION ZONE FROM TOP OF BANK TO HELP ENHANCE EXISTING ECOLOGY
14. PEDESTRIAN AND CYCLE MOVEMENT ROUTES PROVIDING CONNECTIONS BACK TO EXISTING SURROUNDING MOVEMENT ROUTES;
15. POTENTIAL COMMUNITY ALLOTMENTS AND ORCHARD LOCATIONS OFFERING OPPORTUNITIES FOR NATURAL FORAGING AND SUSTAINABLE FOOD PRODUCTION; AND
16. CREATION OF ASHMORE COUNTRY PARK PROVIDING A NATURALISED GREEN SPACE WITH MOWN PATHS AND LARGE AREAS OF WILDFLOWER PLANTING LINKING BACK TO PROPOSED DEVELOPMENT AND EXISTING MOVEMENT ROUTES.



- SITE BOUNDARY
- SUSTAINABLE URBAN DRAINAGE
- RESIDENTIAL DEVELOPMENT
- GREEN INFRASTRUCTURE
- COMMUNITY HUB
- 2 FORM ENTRY SCHOOL

LAND USE

6.2 The development will provide up to 1,750 homes for the District's growing population, providing a range of property sizes and tenures.

6.3 In addition to new homes the proposals will provide:

6.4 A 2-form entry school will be provided to cater for both new residents and the wider community.

6.5 A new community hub containing a range of social, communal spaces and services to meet the day-to-day needs of the residents.

Accessible Greenspace

6.6 The landscape led design provides new residents and the wider community with a generous variety of green spaces and associated facilities. A new country park to the north provides a destination point, whilst a series of "greens" and "commons" are located throughout the site containing play areas, feature landscapes and natural habitats. All of these spaces are connected via a strong network of greenways with a focus on non-vehicular movement.

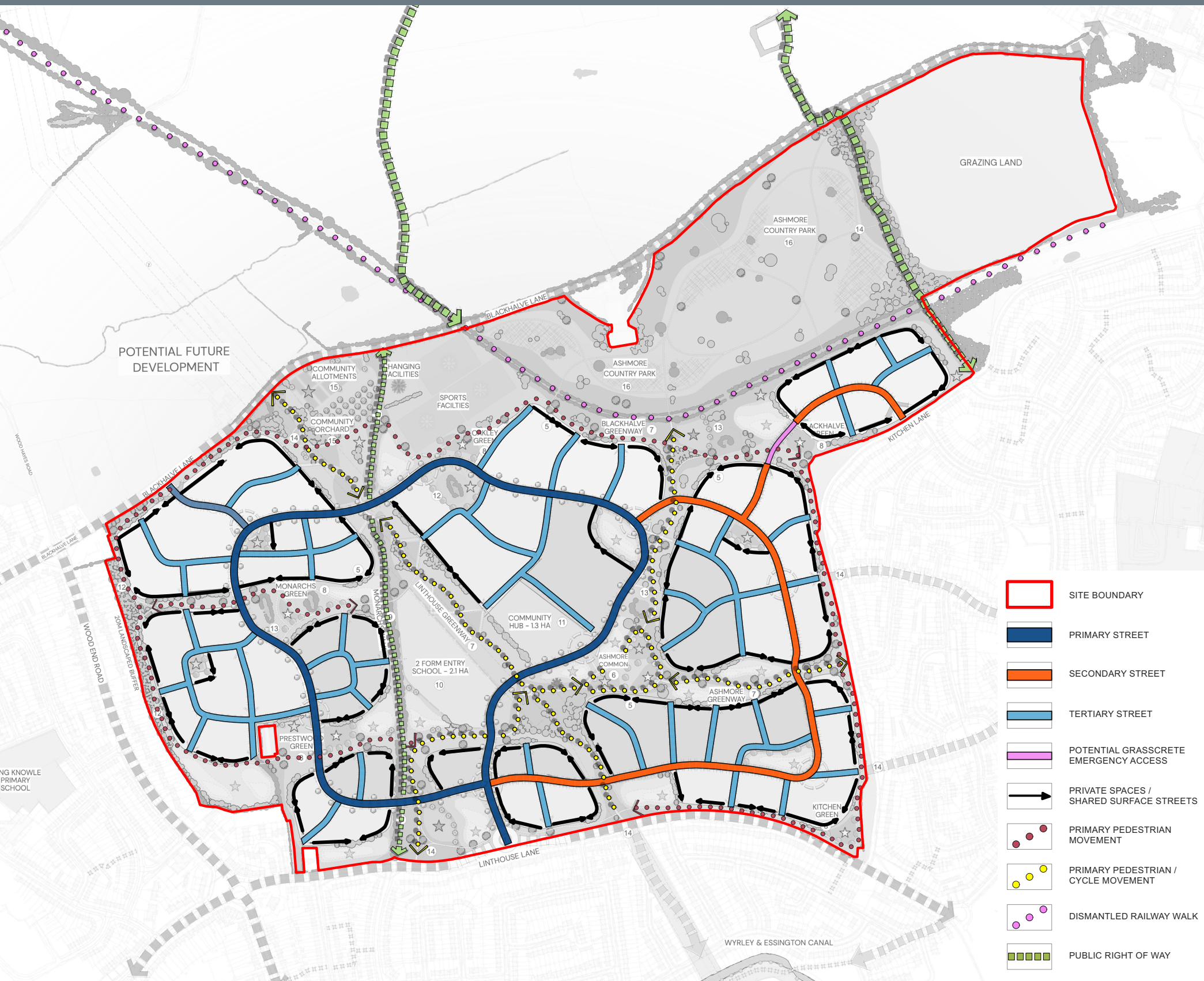
6.7 In addition to the above, communal landscape features are provided through allotments and a community orchard. These spaces will be accessible for new and existing residents to assist in assimilating the development into the wider community.











6.8 Sports provision – between the country park and the development is the opportunity for up to 3 sports pitches and associated changing facilities.

6.9 The development is proposed to have a fully circulatory bus route offering opportunities for full mobility to surrounding urban centres and facilities.

6.10 Pedestrian and cycle movement throughout the development will provide permeability and connections back to existing/ historic movement routes. These connections will allow free movement for all new and existing residents.

6.11 The development will enable further improvements to existing surrounding highway along with making improvements to the immediate infrastructure for access.



-  SITE BOUNDARY
-  PRIMARY STREET
-  SECONDARY STREET
-  TERTIARY STREET
-  POTENTIAL GRASSCRETE EMERGENCY ACCESS
-  PRIVATE SPACES / SHARED SURFACE STREETS
-  PRIMARY PEDESTRIAN MOVEMENT
-  PRIMARY PEDESTRIAN / CYCLE MOVEMENT
-  DISMANTLED RAILWAY WALK
-  PUBLIC RIGHT OF WAY

MOVEMENT STRATEGY

- 6.12 The development has the opportunity to provide a new sustainable and fully circulatory transport infrastructure to serve the growing population as well as existing residents in the South Staffordshire and Wolverhampton area.
- 6.13 The development demonstrates a clear and defined road hierarchy providing strong movement routes throughout the development.
- 6.14 Street hierarchy will comprise a series of interconnected primary, secondary and tertiary routes in recognition of the need to combine the street function as a movement corridor alongside place making functions.
- 6.15 Streets will be pivotable in terms of its function, movement and place function which varies within the hierarchy. Building layout, landscape and character will help to define the hierarchy discouraging a car dominant layout and allowing free movement of pedestrians and cyclists.
- 6.16 On site pedestrians and cyclists will have the opportunity to connect through the development and out to the wider movement infrastructure. Potential connections to nearby employment hubs will be accessible within a 20 min cycle walk/cycle offering green forms of movement and exercise.
- 6.17 A central bus movement route will be provided to run through development offering every resident to be within a ten minute walk of bus services.
- 6.18 Active travel will facilitate movement in and around development to allow sustainable movement to access national transport systems.
- 6.19 Development will facilitate additional highways improvements to surrounding infrastructure to provide for additional capacity on surrounding road systems.



-  SITE BOUNDARY
-  PUBLIC OPEN SPACE
-  SUSTAINABLE URBAN DRAINAGE
-  NEIGHBOURHOOD AREA OF PLAY
-  LOCALLY EQUIPPED AREA OF PLAY
-  NATURAL PLAY SPACE
-  INFORMAL KICKABOUT SPACE
-  COMMUNITY ALLOTMENTS
-  POTENTIAL TRIM TRAIL LOCATION
-  POTENTIAL LOCATION FOR UP TO 4 PITCHES
-  POTENTIAL LOCATION FOR CHANGING FACILITIES

GREEN & BLUE INFRASTRUCTURE

6.20 Landscape design and green infrastructure is a key component for creating an enjoyable, identifiable and memorable development. Landscaped spaces are an integral part of the place making strategy and create a strong green movement structure across development.

6.21 Open spaces will aim to provide new residents with a varying range of community use spaces, such as natural and equipped areas of play, trim trails, community allotments, community orchards, sports facilities and informal kick about spaces.

6.22 Community use land will provide residents with space for social inclusion, active pursuits and formal and informal forms of play for all ages and abilities.

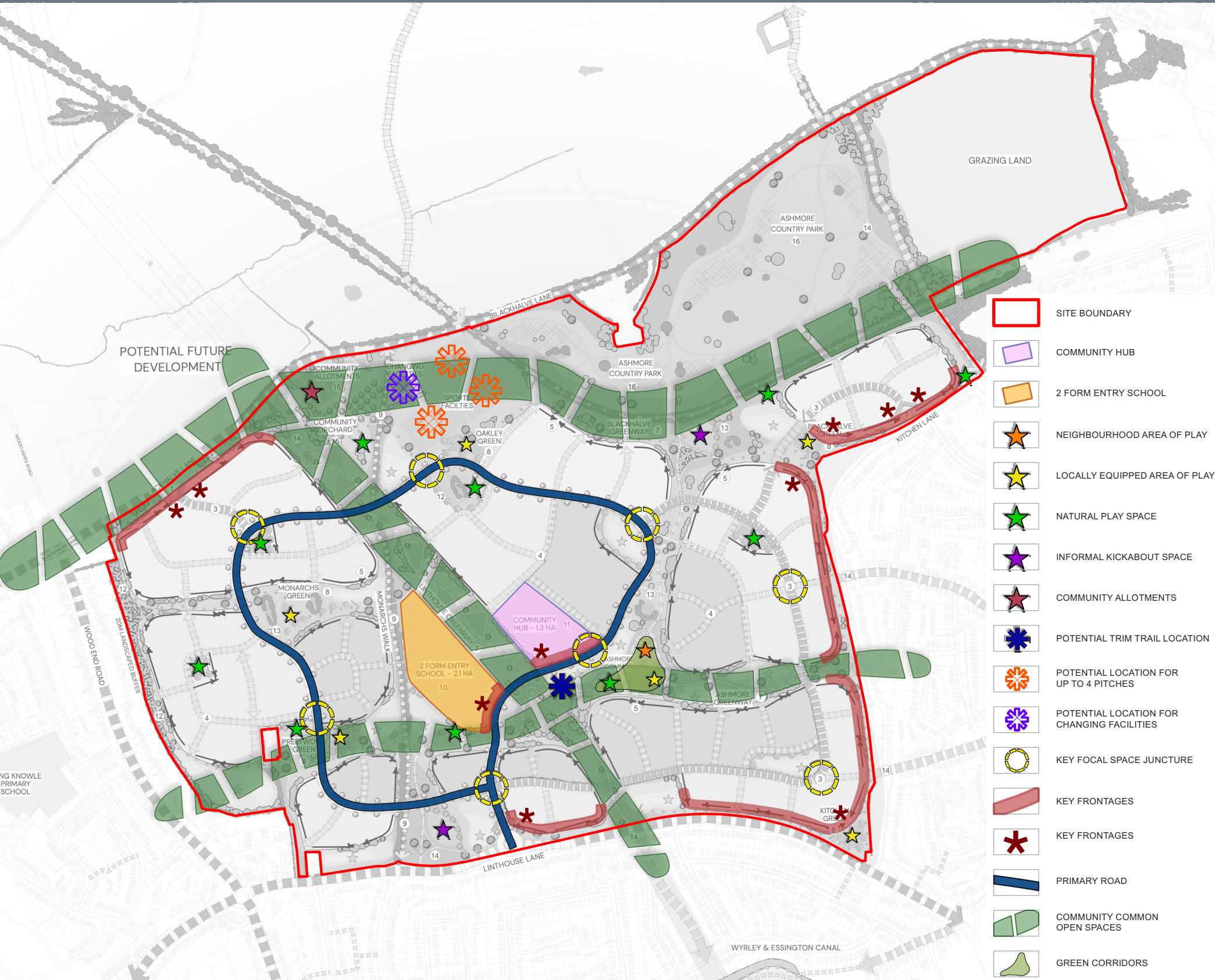
6.23 Enhanced access to existing public movement routes will create a fully accessible and secure infrastructure of green infrastructure incorporating community use land and public open spaces.

6.24 Greenways will provide a multifunctional space allowing for free movement between open spaces, enhanced landscaped corridors, enriched foraging routes for wildlife and spaces for residents to move freely within development without the need to use highway land if desired.

6.25 New sporting facilities will provide a space for all ages to be active while also offering opportunities for social inclusion and community pursuits.

6.26 All onsite existing trees and hedgerows are to be retained where possible with major enhancements where possible. This will help safeguard wildlife habitats, foraging routes and biodiversity on site.

6.27 All site low points will be utilised for sustainable drainage solutions providing opportunities wetland habitats and an increase in biodiversity.



-  SITE BOUNDARY
-  COMMUNITY HUB
-  2 FORM ENTRY SCHOOL
-  NEIGHBOURHOOD AREA OF PLAY
-  LOCALLY EQUIPPED AREA OF PLAY
-  NATURAL PLAY SPACE
-  INFORMAL KICKABOUT SPACE
-  COMMUNITY ALLOTMENTS
-  POTENTIAL TRIM TRAIL LOCATION
-  POTENTIAL LOCATION FOR UP TO 4 PITCHES
-  POTENTIAL LOCATION FOR CHANGING FACILITIES
-  KEY FOCAL SPACE JUNCTURE
-  KEY FRONTAGES
-  KEY FRONTAGES
-  PRIMARY ROAD
-  COMMUNITY COMMON OPEN SPACES
-  GREEN CORRIDORS

PLACEMAKING

6.28 The development will seek to implement key principles that development will respond appropriately to. These will be shaped by the site's constraints and opportunities, helping development to meet best standards of Urban Design practice.

6.29 Key principles that development will seek to respond to are:

- Creation of key gateways located at each access into development with the aim of creating memorable and positive development upon arrival into the site.
- Key nodal points along primary movement routes will assist in way finding opportunities for the user.
- A series of key frontages along highly visible edges will seek to respond in an appropriate manner to its setting.
- Creation of a central multi-functional community hub will serve new and existing residents with educational, health, retail and public facilities.
- Creation of a road hierarchy that assist in wayfinding throughout development with a gradual reduction in movement as development moves out towards rural/greenway edges.

- The creation of a strong green infrastructure and open space structure, comprising public open space, wildlife ecology areas, community use spaces and equipped areas of play.
- Creation of a fully circulatory/ fully connected movement infrastructure that promotes green forms of movement and demonstrates a non-car dominated development.
- Maximum outward facing development will provide passive surveillance over newly created open spaces assisting in reducing anti-social behaviour.
- Sensitive rural edges along the northern edges of development are designed appropriately to provide a high-quality interface.
- Interfaces with existing development along southern and eastern edges will be designed to complement existing development and assimilate appropriately into its surroundings.



CONCLUSION

7.1 The land off Linthouse Lane is truly deliverable and there is nothing to prevent its allocation for residential development in the South Staffordshire's Local Plan Review. The site provides the opportunity to realise a sustainable, quality urban extension on the northern edge of Wolverhampton which could accommodate up to 1,750 new homes and facilities set amongst extensive areas of public open space.

AVAILABLE NOW

7.2 The land shown on page 12 is under the control of Taylor Wimpey, a national housebuilder who are committed to bringing forward a planning application for the site following further consultation and progression of the Local Plan Review.

7.3 There are no legal or ownership impediments which would prevent the land from being delivered for residential use.

SUITABLE LOCATION

7.4 The site comprises Green Belt land on the edge of Wolverhampton which can be demonstrated is suitable for release to meet housing needs of the city of Wolverhampton, South Staffordshire District and the Greater Birmingham Housing Market Area. Wolverhampton has a wide range of services and facilities located in its existing built area and also provides excellent links to other cities throughout the country. The site is considered to be a sustainable location for residential development.

ACHIEVABLE

7.5 The site comprises greenfield land and will not be subject to any known major remediation or preparation costs. Taylor Wimpey has reviewed the economic viability of the site and proposals in terms of land values, market attractiveness / demand, sales rates and development costs and can confirm that the development is economically viable. Taylor Wimpey also has the capacity to deliver the proposed development.

7.6 In terms of a delivery programme, following an allocation in the Local Plan Review, the first occupations could potentially occur as early as 2026, whilst the whole development would be completed in accordance with the housing delivery trajectory set out within the Local Plan Review.

7.7 In summary, the site will deliver a significant number of much-needed housing in the medium-term to long-term in a sustainable location. Taylor Wimpey has confirmed that the proposed development is viable and they are able to deliver the development in a timely manner. Therefore, the site is achievable.

7.8 Taylor Wimpey is committed to working with South Staffordshire District Council, other key stakeholders and the local community to design a quality residential development which respects and enhances the village. Taylor Wimpey will use this document to facilitate further consultation with the relevant authorities and the local community to refine the proposals in light of further input and to support appropriate representations to the Local Plan Review.



APPENDIX 1

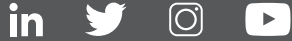
Taylor Wimpey UK Limited

Taylor Wimpey UK Limited is a dedicated homebuilding company with over 126 years' experience; we have an unparalleled record in our industry. We aim to be the homebuilder of choice for our customers, our employees, our shareholders and for the communities in which we operate.

We have expertise in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure which improves our customers' quality of life and adds value to their homes. We draw on our experience as a provider of quality homes but update that, to the expectations of today's buyers and strive to provide the best quality homes, while setting new standards of customer care in the industry. Our 23 regional businesses in the UK give our operations significant scale and truly national geographic coverage.

Each business builds a range of products, from one bedroom apartments and starter homes to large detached family homes for every taste and budget and as a result, our property portfolio displays a surprising diversity. The core business of the company is the development for homes on the open market, although we are strongly committed to the provision of low cost social housing through predominantly partnerships with Local Authorities, Registered Providers as well as a variety of Government bodies such as the Homes England.

With unrivalled experience of building homes and communities Taylor Wimpey today continues to be a dedicated house building company and is at the forefront of the industry in build quality, design, health and safety, customer service and satisfaction. Taylor Wimpey is committed to creating and delivering value for our customers and shareholders alike. Taylor Wimpey combines the strengths of a national developer with the focus of small local business units. This creates a unique framework of local and national knowledge, supported by the financial strength and highest standards of corporate governance of a major plc. Taylor Wimpey Strategic Land, a division of the UK business, is responsible for the promotion of future development opportunities, such as this site, through the planning system. The local business unit that will, in conjunction with Strategic Land, carry out housing and related development is Taylor Wimpey North Midlands based in Wolverhampton.



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PLANNING



ECONOMICS



HERITAGE

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