

SOUTH STAFFORDSHIRE LOCAL PLAN PREFERRED OPTIONS NOVEMBER 2021

LAND AT LINTHOUSE LANE

TAYLOR WIMPEY UK LTD

Taylor
Wimpey

**TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012**



Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Edinburgh | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough | Solent

DESIGN ENVIRONMENT PLANNING ECONOMICS HERITAGE

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Group.

Pegasus Group is a trading name of Pegasus Planning Group Limited [07277000] registered in England and Wales Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT
Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

CONTENTS:

Page No:

1.0	Introduction	1
2.0	What Does the Local Plan Need to Consider?	3
3.0	Development Strategy	8
4.0	Site Allocations	13
5.0	Development Management Policies.....	16
6.0	Sustainability Appraisal	29
7.0	Land at Linthouse Lane	37
8.0	Conclusion	51

APPENDICES:

Appendix 1: Site Location Plan

Appendix 2: Development Vision Document

1.0 Introduction

1.1 This representation is made by Pegasus Group on behalf of Taylor Wimpey UK Ltd ('Taylor Wimpey') to the South Staffordshire Local Plan Review ('LPR') Preferred Options Consultation ('the Consultation'). The consultation is progressed under 'Regulation 18' of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 This representation relates to Land at Linthouse Lane, which Taylor Wimpey is promoting for residential-led development. A Site Location Plan is included at **Appendix 1** to this Representation. This land encompasses that which is identified through emerging Policy SA3 of the LPR as Strategic Housing allocation '*Land at Linthouse Lane*', in addition to a further 20 hectares of land (approx.) which Taylor Wimpey is promoting as land to be released from the Green Belt and safeguarded for development beyond the plan period.

1.3 These representations respond to the following documents, including addressing the questions set out within the LPR Consultation Document:

- Sustainability Appraisal of the South Staffordshire Local Plan Review – Preferred Options Plan, Regulation 18 (III) SA Report, August 2021
- Infrastructure Delivery Plan (South Staffordshire District Council) 2021
- South Staffordshire Green Belt Study – Stage 1 and 2 Report (LUC), July 2019
- South Staffordshire Landscape Sensitivity Assessment (LUC) 2019
- Rural Services and Facilities Audit (South Staffordshire Council) 2021

- Viability Assessment – Local Plan and Community Infrastructure Levy (Dixon Searle Partnership) October 2021.

1.4 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.5 The representations also give consideration to the legal and procedural requirements associated with the plan-making process.

2.0 What Does the Local Plan Need to Consider?

- 2.1 Taylor Wimpey supports South Staffordshire District Council ('SSDC') in progressing with a 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 SSDC to comprehensively review the adopted Development Plan, including not only its own objectively assessed housing need, but also the role of the District in meeting unmet cross boundary needs from the wider Greater Birmingham Housing Market Area ('GBHMA'), including from the Black Country.

National Requirements for Plan-Making

- 2.2 Paragraph 33 of the National Planning Policy Framework 2021 ('NPPF') requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years.
- 2.3 Paragraph 24 of the NPPF also confirms that local planning authorities "*...are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.*" In the context of South Staffordshire, strategic matters can include housing, employment, infrastructure and the Green Belt.
- 2.4 Taylor Wimpey supports the Council'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 2038 and to ensure that development is genuinely plan-led.

Evidence Base

- 2.5 Appendix A of the LPR Consultation Document sets out the range of studies which will be, or have been prepared, to evidence and justify the policies and allocations contained within the LPR.

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to.

- 2.6 Generally, the documents listed in Appendix A are considered to represent comprehensive evidence base necessary to support a local plan. It is also noted that a number of the documents have been updated in 2021, which is also supported.
- 2.7 However, concern is raised that the *Greater Birmingham HMA Strategic Growth Study*, *SSDC's Self Build & Custom Build Register* and the *Strategic Housing & Employment Land Availability Assessment ('SHELAA')* are not included, although it is noted that an updated SHELAA (2021) is available on SSDC's website. It is therefore assumed that its omission from Appendix A is a typographical error.
- 2.8 Nevertheless, the GBHMA Strategic Growth Study is a key aspect of the LPR evidence base and is a crucial piece of evidence in the context of South Staffordshire District.
- 2.9 The GBHMA Strategic Growth Study remains the latest comprehensive consideration of housing needs across the Greater Birmingham and Black Country HMA and provides a range of recommended options for meeting these needs, to be tested through individual LPA Local Plan reviews. This evidence has been subject to scrutiny as supporting evidence at the North Warwickshire Local Plan examination and provides justification for SSDC's intended contribution of 4,000 homes to assist in meeting the identified housing shortfall, as set out in draft Policy DS3.
- 2.10 Similarly, it is considered the Self Build & Custom Build Register should be identified as part of the evidence base to inform emerging policies in respect of housing needs and mix, including the level of self-build and custom-build housing that is expected to be provided on applications for residential

development.

2.11 Whilst the consultation document raises specific questions in relation to some evidence base documents, such as the Infrastructure Delivery Plan ('IDP'), it fails to ask questions in respect of others. Comment on these specific evidence base documents is accordingly contained within the following Chapters of this Representation.

Evidence Base Document	Comment within Representation
Sustainability Appraisal of the South Staffordshire Local Plan Review – Preferred Options Plan, Regulation 18 (III) SA Report, August 2021	Chapter 6
South Staffordshire Green Belt Study – Stage 1 and 2 Report (LUC), July 2019	Chapter 7
South Staffordshire Landscape Sensitivity Assessment (LUC) 2019	Chapter 7
Rural Services and Facilities Audit (South Staffordshire Council) 2021	Chapter 7
Viability Assessment – Local Plan and Community Infrastructure Levy (Dixon Searle Partnership) October 2021.	Chapter 5

Infrastructure Delivery Plan

2.12 An IDP (2021) has been prepared to support the LPR to ensure the required infrastructure and investment needed to deliver the plan effectively is identified. The IDP should include the specific infrastructure projects needed to deliver planned growth and will be updated as the plan progresses

Question 2:

(a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP?

Yes/No

(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?

Yes/No

2.13 Taylor Wimpey supports SSDC's proposed infrastructure-led strategy which seeks to focus development towards larger and better-connected settlements and, where appropriate, deliver new infrastructure benefits.

2.14 Development of Land at Linthouse Lane, can facilitate significant infrastructure provision, including the following infrastructure opportunities identified within the IDP:

- Improvements to sports and leisure facilities within the District.
- Opportunities to develop new primary education facilities
- Opportunities for additional retail provision
- Enhancements to the Green Infrastructure Network, including the provision of new publicly accessible open space and measures to ensure achievement of biodiversity net gain.
- Obligations towards health provision

2.15 Overall, it is considered that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP. Taylor Wimpey is committed to engaging with SSDC, the Parish Council and service providers to explore infrastructure requirements to inform future iterations of the Infrastructure Delivery Plan and the emerging proposal for Land at Cross Green.

Vision and Strategic Objectives

2.16 The LPR Consultation Document identifies a number of 'Issues and Challenges' surrounding homes and communities, economic vibrancy 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.

Question 3:

a) Have the correct vision and strategic objectives been identified?

Yes/No

b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No

- 2.17 Whilst the Vision is succinct, it is not considered to be locally relevant and contains no spatially specific elements. It also seeks to 'protect and enhance' the District as it currently exists, rather than thinking forward and considering how the growth proposed within the LPR can better the District as a whole.
- 2.18 The strategic objectives identified are also broadly supported, particularly the recognition of the requirement to make a proportionate contribution towards the unmet needs of GBHMA contained within Objective 2.
- 2.19 Overall, it is considered that the draft emerging policies will assist in delivering these objectives.

3.0 Development Strategy

Green Belt and Open Countryside

Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside? Yes/No If no, please explain how these policies should be amended?

- 3.1 Policy DS1 is broadly in line with the relevant paragraphs of the NPPF relating to development within the Green Belt and is therefore supported.
- 3.2 The recognition within the supporting text that exceptional circumstances exist for Green Belt release within the District to allow for sustainable development within the plan period is also supported. However, this recognition should also be included within Policy DS1, with cross reference made to the relevant sites where Green Belt release is proposed.
- 3.3 Taylor Wimpey has no comment to make in respect of Policy DS2.

Housing

- 3.4 Taylor Wimpey supports the recognition at Paragraph 4.6 of the LPR that:

"A key part of the new Local Plan is to establish the role that South Staffordshire Council can play in both meeting its own housing needs and those of the wider Greater Birmingham Housing Market Area (GBHMA), which contains local authorities with significant unmet housing needs (Birmingham and the Black Country)."

Spatial Strategy to 2038

Question 5: Do you support the policy approach in Policy DS3 – The

Spatial Strategy to 2038? Yes/No If no, please explain how this policy should be amended?

- 3.5 Policy DS3 sets out that SSDC will deliver a minimum of 8,881 dwellings, comprising 4,131 dwellings to meet South Staffordshire's own housing need using the Government's standard method across the 17-year plan period 2021-2038, 750 dwellings which have already been completed in the District in the period 2018-2021 and a further 4,000 dwellings to contribute towards the unmet needs of the GBHMA.
- 3.6 The Policy also defines a settlement hierarchy across five 'tiers', across which the housing target will be distributed.
- 3.7 Taylor Wimpey broadly supports the policy approach of Policy DS3. However, it remains a concern that the 8,881 dwellings proposed through the LPR may be insufficient, as set out below. In addition, it is submitted that the Spatial Housing Delivery Table (Table 8), should be woven into the Policy, as the settlement hierarchy currently doesn't consider locations adjacent to the Black Country Urban Area, such as Land at Linthouse Lane, as sustainable locations for growth.

Housing Requirement for South Staffordshire District

- 3.8 This is based upon the Government's Standard Method for Calculating Housing Need, which currently requires the district to deliver a minimum annual average of 243 dwellings per annum ('dpa'), based upon a baseline figure of 195 dpa and the 2020 affordability ratio of 7.88 (released March 2021)¹.
- 3.9 Nonetheless, Planning Practice Guidance ('PPG') is clear that the figure produced by the Standard Method represents a *minimum* figure, rather than

¹ Whilst the Strategic Housing Market Assessment ('SHMA') identifies a minimum housing requirement of 254 dpa, it is acknowledged that this is based upon the 2018 affordability ratio of 7.39 and is therefore out of date.

a requirement².

3.10 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 authorities³.

3.11 Other circumstances that should be considered in respect of South Staffordshire District include the balance between homes and jobs created over the plan period.

3.12 These circumstances are considered in further detail below.

Unmet Housing Needs from the Wider Housing Market Area

3.13 The recognition of the significant housing shortfall arising from Birmingham City and the Black Country at paragraphs 4.8-4.9 of the Consultation Document is supported.

3.14 The 37,900-home shortfall arising from within Birmingham has been tested and confirmed at examination, whilst the Black Country Authorities have produced the Draft Black Country Plan 2018-2039, which subject to consultation in 2021, which concluded that the amount of housing need which cannot be accommodated in the Black Country amounts to around 28,239 homes to 2039.

3.15 It is important to stress that these shortfall figures do not take into consideration the 35% uplift applied to Birmingham introduced in December 2020, as the adopted Birmingham Development Plan pre-dated this. The overall unmet housing need figure arising from the GBBCHMA is therefore well in excess of 66,000 homes.

² Paragraph: 002 Reference ID: 2a-002-20190220

³ Paragraph: 010 Reference ID: 2a-010-20201216

3.16 The LPR Consultation Document sets out that, in order to contribute towards meeting this shortfall, SSDC will "test" for the delivery of an additional contribution of 4,000 dwellings through the LPR, based on the scale of growth implied in the district by the strategic locations identified in the GBHMA Strategic Growth Study⁴ ('SGS').

3.17 The principle of this contribution is supported by Taylor Wimpey, although SSDC should continue to co-operate with other authorities within the GBHMA to ensure that the level of the contribution made by each Authority is sufficient to collectively meet the significant shortfall discussed above.

Economic Uplift

3.18 The SHMA sets out the broad economic consequences of the projected growth in Chapter 5. However, the SHMA fails to consider the impact of committed development at the West Midlands Interchange ('WMI'), which is projected to create around 8,500 new jobs, well in excess of the increased in the working age population between 2018 and 2038 identified by the SHMA (3,489 people).

3.19 In addition, significant jobs growth will be provided through committed strategic employment developments planned at i54 and ROF Featherstone.

3.20 At present, the SHMA fails to consider whether the minimum local housing need figure derived from the standard method (243 dpa equating to 4,131 dwellings) would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth, even taking into consideration the 4,000 additional homes to meet unmet needs in the wider GBHMA.

3.21 Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand. This may require an uplift in local housing needs identified.

⁴ Greater Birmingham HMA Strategic Growth Study (GL Hearn) 2018

Spatial Strategy

- 3.22 SSDC previously consulted on a Spatial Housing Strategy and Infrastructure Delivery (SHSID) document in October 2019. This looked at how the proposed housing target could be distributed between different settlements and other broad locations within the District.
- 3.23 Taylor Wimpey supports the distribution of housing growth through the identification of strategic sites close to the Black Country and proportionate growth focused to the villages.
- 3.24 Taylor Wimpey particularly supports the allocation of Land North of Linthouse Lane, which is comprises Strategic Development Location SA3. This allocation not only assists in providing improved infrastructure but also has due regard to where housing needs exist, including within locations close to the Black Country conurbation where a 28,239-home shortfall in provision has been identified.

Longer Term Growth Aspirations for a New Settlement

- 3.25 Policy DS4 sets out an aspiration for SSDC to deliver a new settlement to be delivered 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.

Question 6: Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement? Yes/No If no, please explain how this policy should be amended?

- 3.26 Taylor Wimpey has no comment to make in respect of Policy DS4, other than to agree that such an option would not contribute to housing growth during the proposed plan period to 2038.

4.0 Site Allocations

Strategic Masterplanning Locations

4.1 Taylor Wimpey has a number of land interests within South Staffordshire District. This Representation relates to Land at Linthouse Lane and should be read in conjunction with other representations submitted on behalf of Taylor Wimpey.

Question 7:

a) Do you support the proposed strategic housing allocations in policies SA1-SA4? Yes/No If no, please explain your reasons for this.

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code? Yes/No

4.2 Taylor Wimpey supports the proposed identification of strategic housing allocations at Cross Green (ref: SA2) and at Land North of Linthouse lane (ref: SA3).

4.3 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. The key infrastructure and design requirements listed within the Policies are helpful in informing the masterplan and design code.

4.4 In respect of Land at Linthouse Lane, the LPR identifies that the Site provides the opportunity to deliver approximately 1,200⁵ dwellings alongside new infrastructure as identified in Policy SA3. Whilst Taylor Wimpey supports the allocation, it is contented that the Site has a greater capacity than that identified within Policy SA3. The Promotional Document included at **Appendix 2** to this Representation demonstrates that the Site is capable of

⁵ With a further 776 dwellings to be delivered beyond the plan period, totalling 1976.

accommodating around 2,100-2,450 homes.

4.5 Taylor Wimpey's land interests extend to the whole proposed Linthouse Lane allocation, as identified within Appendix B of the LPR Consultation Document. As such, it is not considered necessary for Policy SA3 to include a requirement to produce a Supplementary Planning Document to cover the site. The fact that the Site is under the control of a single housebuilder should provide the confidence that a comprehensive and co-ordinated approach to development can be achieved in its delivery. The preparation of site specific SPDs, as vehicles for setting out further guidance, has the potential to delay delivery of strategic housing allocations, with no guarantees of an adoption date beyond adoption of a new Local Plan.

4.6 Taylor Wimpey is nonetheless committed to preparing a masterplan and design code as part of any application for outline planning permission. These documents will be prepared having regard to the requirements established through SA3 and the suite of proposed development management policies. In addition, the preparation of a masterplan and design code will provide opportunity for a collaborative approach including engagement with the local community and key stakeholders. This masterplan and design code would provide a suitable framework to control any detailed or reserved matters applications. Significant masterplanning and design work has already been undertaken by Taylor Wimpey, as evidence through the submitted Promotional Document.

4.7 This Document demonstrates the site is available, suitable and viable, with further information provided within Chapter 7 of this representation.

Housing Allocations

Question 8: Do you support the proposed housing allocations in Policy SA5? Yes/No Please reference the site reference number (e.g site 582) for the site you are commenting on in your response.

-
- 4.8 This representation relates to Land at Linthouse Lane which is a strategic allocation not covered by Policy SA5. Further comments in respect of the proposed housing allocations contained in Policy SA5 are set out in other representations submitted on behalf of Taylor Wimpey.

5.0 Development Management Policies

5.1 Chapter 6 of the LPR sets out a number of preferred approaches to policies against which planning applications will be determined. At this stage, these preferred approaches do not reflect the final policy wording that will be included in the Local Plan Review that will be submitted to the Secretary of State. Instead, they are intended to highlight key requirements, aims and measures that the final submitted policies will deliver, focusing on the most important parts of the future policies to seek views on these.

Question 11: Do you agree with the proposed policy approaches set out in Chapter 6? Yes/No. If no, then please provide details setting out what changes are needed, referencing the Policy Reference number (e.g HC1 - Housing Mix).

Policy HC1 – Housing Mix

5.2 Whilst it is recognised that the Policy contained within the LPR Consultation Document is not a 'final' version of the intended Policy, it is nevertheless submitted that the final wording should be flexibly worded to allow for appropriate application across the differing settlements and locations across the District, as appropriate.

5.3 At present, the Policy requires 'major development' to provide:

- 75% of market homes to have 3 bedrooms or less, with specific breakdown to be determined with reference to latest Housing Market Assessment; and
- Specific breakdown of affordable housing to be determined with reference to latest Housing Market Assessment and other affordable housing needs evidence

- 5.4 This wording is not sufficiently clear or flexible. It is not clear whether applications will be expected to strictly accord with the evidence presented in the SHMA, or simply have 'reference' to that evidence.
- 5.5 It is submitted that it is most appropriate for housing mix to be guided by market signals as reflected in the most up-to-date assessment of needs. Such assessments will need to be updated over the course of the Plan period. The requirement that 75% of properties comprise of three-bedrooms or less is restrictive and does not afford the flexibility required for the reasons set out above.
- 5.6 The policy should also comment that it is subject to viability assessment, thus allowing for flexibility in its application.
- 5.7 Lastly, 'Major development' is defined by footnote 11 of the LPR which states that:

"Major residential development is defined in the 2019 National Planning Policy Framework as "development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more" [NB this definition is carried through to the 2021 version of the NPPF].

- 5.8 Whilst a definition of major development ***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)** [Pegasus Emphasis].*

- 5.9 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. It is submitted that the definition in the DMPO should be referred to within the LPR for the avoidance of doubt.

Policy HC2 – Housing Density

- 5.10 Policy HC2 currently 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*".

- 5.11 The objective of achieving an efficient use of land on development sites is supported. However, the policy should be drafted to recognise that a blanket approach to density is unlikely to be effective as this will vary between individual sites depending on specific site constraints and opportunities. Furthermore, it is considered that this wording does not provide direction as to what is expected of developments adjacent to settlements within Tiers 2-5 of the Settlement Hierarchy, which should be corrected.

Policy HC3 – Affordable Housing

- 5.12 Policy HC3 requires proposals for major residential development to provide 30% of all dwellings to be affordable housing, broken down using the following ratio:

- 50% social rent,
- 25% shared ownership, and
- 25% first homes

- 5.13 The require for 30% affordable housing appears to be broadly supported by

the Viability Study⁶ which confirms that affordable housing within the range of 20-30% is potentially relevant to strategic housing sites overall, assuming a maximum of £9,200/dwelling S106 costs and no additional CIL contributions.

5.14 It is recognised that a Stage 2 Viability Assessment will be undertaken once more refined and bespoke assumptions regarding infrastructure and development costs are known. It also is understood that the Infrastructure Delivery Plan will continue to be evolved and refined as the Local Plan review progresses.

5.15 Taylor Wimpey would welcome the opportunity to engage with the Council and the appointed viability consultants prior to the publication of the Stage 2 Assessment.

5.16 The requirement to 'pepperpot' affordable housing in clusters across the development is generally supported. However, the policy should recognise that for management purposes, Registered Providers do require a degree of clustering of affordable housing within a development and this will inform site layouts.

5.17 Policy HC3 also suggests it would not support grant funding for homes to be provided under the requirements of the Policy. It is submitted that the funding mechanisms for the delivery of affordable housing is not a planning matter and is therefore beyond the remits of a Policy to control. This text should accordingly be removed.

Policy HC4 – Homes for Older People

5.18 Policy HC4 requires major development to:

"...make a clear contribution to meeting the needs of the district's

⁶ Viability Assessment – Local Plan and Community Infrastructure Levy (Dixon Searle Partnership) October 2021.

ageing population, through the provision of either: general needs properties for older people e.g. bungalows, other ground floor accommodation with appropriate age restrictions on occupation; or specialist housing e.g. sheltered, extra care homes.

30% of all market and affordable homes to meet Building Regulations Standard Part M4(2) – Accessible and adaptable dwellings."

- 5.19 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.
- 5.20 It also is also unclear as to the level of bungalows or other ground floor accommodation that development is expected to provide. This should be quantified to ensure less scope for unnecessary discussions between developers and SSDC at a later stage in the application process. It is not clear if this policy intends to continue to SSDC's current approach of requiring 10% of all homes to be delivered as bungalows or other ground floor accommodation.
- 5.21 The policy also sets out that 30% of all market and affordable homes should meet Building Regulations Standard Part M4(2) Accessible and adaptable dwellings. These requirements are 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 justified adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case.

5.22 Furthermore, the SHMA 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 (Table 8 of the LPR identifies a supply of 10,034 dwellings). It is therefore not clear how the 30% requirement within the Policy has been arrived at or how this is justified. The requirement to provide a proportion of dwellings to meet Part M4(2) may be justified but it would not be appropriate to include both this requirement and a requirement to provide bungalows or other ground floor accommodation.

Policy HC7 – Self & Custom Build Housing

5.23 Policy HC7 requires sites for major residential development to "*...have regard to any need identified on the self-build and custom housebuilding register, with provision to be agreed on a site-by-site basis.*"

5.24 This approach is generally supported. The imposition of a District-wide percentage requirement would not be supported, as it would likely result in the over-provision of self-build and custom-build housing within the District.

5.25 It is nevertheless submitted that the above Policy should include a mechanism to allow for such plots to come forward for market housing if demand is subsequently found to be absent. For example, if serviced plots for self-build and custom housebuilding have been made available and marketed for 12 months and have not sold, plots can be used for delivery of general market housing.

Policy HC9 – Design Requirements

5.26 Taylor Wimpey supports the introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance.

5.27 However, the requirement to provide tree lined streets should only be in

instances where the locations are agreed by the highway authority. Local highway authorities often do not want trees in immediate proximity of the street due to management concerns or liabilities.

5.28 The utilisation of design codes is supported, but only where they are commensurate with the scale of development proposed. In general, it is expected that they be limited to strategic level sites.

Policy HC11 – Space about dwellings and internal space standards

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

5.30 The requirement that all dwellings should meet Nationally Described Space Standards is not supported. National Planning Guidance Housing: optional technical standards (paragraph 020) clearly states 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.”

5.31 It is clear that the introduction of the NDSS requires a Local Plan policy which has been fully evidenced, justified and viability tested. The Strategic Housing Market Assessment (SHMA) makes reference to the NDSS (paragraph 7.35) only in the context of assessing the need for accessible and adaptable homes. the SHMA does not provide any justification or evidence for requiring NDSS in the District.

5.32 If NDSS is subsequently justified and pursued, the policy should be sufficiently flexible to recognise that well-designed housetypes which fall slightly below will be acceptable, particularly on sites where the majority of the dwellings comply. The policy should also make provision for additional flexibility in relation to affordable housing as many registered providers have their own requirements.

Policy HC12 – Parking Standards

5.33 The continuity of existing parking standards is supported.

5.34 In respect of EVCPs, The Department of Transport Consultation Response: Electric Vehicle Charging Points (EVCP) in Residential & Non-Residential Buildings dated November 2021 sets out that from June 2022 new dwellings with associated parking will have at least 1 EVCP per dwelling. Therefore, it is no longer necessary for the Council to have a proposed policy requirement for EVCPs.

5.35 It is also 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 should inform the Stage 2 Viability Study.

Policy HC14 - Health Infrastructure

- 5.36 The policy objective of ensuring development does not result in an unacceptable impact on health infrastructure is supported. It is suggested that SSDC should engage with the CCG now regarding proposed allocations to refine the approach to infrastructure contributions and include this as part of the IDP. Any infrastructure contributions will be required to meet the CIL tests. This approach ensures that all likely costs associated with the proposed allocations are known, thus allowing for an informed view as to their viability.

Policy HC15 – Education

- 5.37 The policy approach is generally supported although, again, it is suggested that SSDC should engage with SCC Education and include relevant infrastructure requirements as part of the IDP, to ensure that all costs associated with allocations are known.

Policy HC17 – Open Space

- 5.38 The policy requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site, for example where there is already high-quality equipped play provision in the locality it would not make sense to duplicate this provision. In addition, it is not appropriate to require open space to be centrally located on all sites. The policy should take a more flexible approach to achieve the right design solution for each site.
- 5.39 In addition, the exclusion of small incidental green infrastructure (GI) without a clear recreational purpose from on-site open space provision is not supported. The policy text cites landscape buffers as an example of incidental GI which may be excluded. This is not appropriate as landscape buffers can

be of a significant size and clearly make a contribution towards open space provision on a site. They should therefore be included in these calculations.

- 5.40 Clarification should also be provided as to whether features such as attenuation basins are considered to be 'incidental'.

Policy HC18 – Sports Facilities and Playing Pitches

- 5.41 Policy HC18 requires major developments to determine required provision through use of the latest Playing Pitch Calculator and Sports Facilities Calculator provided by Sport England, informed by the recommendations of both the Indoor Sports Facilities Strategy 2020 and the Playing Pitch Strategy 2020. Further guidance on the procedure for determining provision required from new development will be set out in an Open Space, Sport and Recreation SPD.

- 5.42 This policy is noted, although it is submitted that it would be more appropriate for SSDC to define standards expected from development as part of policy (as per the open space standard defined by Policy HC17, for example). This approach provides greater certainty in respect of the infrastructure delivery requirements expected from sites, which ultimately impacts upon their viability. The level of provision expected, and the associated viability implications should be considered within both the IDP and viability assessment.

Policy EC3 – Inclusive Growth

- 5.43 The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential units is not supported by Taylor Wimpey.
- 5.44 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.

5.45 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.

Policy EC9 – Infrastructure

5.46 Policy EC9 commits SSDC to work with and support infrastructure providers and also offer policy support for the delivery of infrastructure identified through the IDP. This is broadly supported, although this engagement with relevant providers should also be taking place as part of the Plan process.

Policy EC10 – Developer Contributions

5.47 Policy EC10 confirms that specific infrastructure requirements will be identified in relevant policy areas and site proformas.

5.48 Whilst this approach is supported, it is paramount that a detailed list of infrastructure requirements is included within the Publication (Regulation 19) version of the Plan, to allow for sufficient scrutiny and comment by the public and interested parties.

Policy NB1 - Protecting, Enhancing and Expanding Natural Assets

5.49 Policy NB1 is supported on the whole. However, the final sentence again refers to a requirement to provide tree lined streets. As set out above in respect of Policy HC9, tree lined streets should only be included following

detailed engagement with the local highway authority, due to the practicalities of management, maintenance and liability.

Policy NB3 - Cannock Chase SAC

- 5.50 The Local Plan Review notes that a separate suite of joint studies are being updated with adjoining authorities in relation to Cannock Chase SAC. The findings of these studies should influence the policy approach to Cannock Chase SAC and determine appropriate mitigation measures.

Policy NB6 - Energy and Water Efficiency, Energy and Heat Hierarchies and Renewable Energy in New Development

- 5.51 The aspirations of this policy to reduce carbon emissions is generally supported. The policy should nevertheless confirm the threshold at which developments are expected to submit an energy statement as part of any application for planning permission.
- 5.52 The inclusion of the target to achieve a 31% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L 2013 are noted. It is understood that this requirement is reflective of anticipated changes to building regulations to deliver the Government's 'Future Homes Standard'. These changes mean that, from mid-2022, new homes will have a 31% reduction in CO₂ when compared to current standards. Further changes are due in 2025 that will mean a 75% reduction in CO₂ when compared to today, along with a new focus on rating primary energy efficiency as well as CO₂.
- 5.53 The Council's proposed policy approach is unnecessary and repetitious of 2021 Part L Interim Uplift. It is the Government's intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council does not

need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.

6.0 Sustainability Appraisal

6.1 The LPR Consultation is supported by a Sustainability Appraisal, prepared by Lepus Consulting⁷ ('the SA'). 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 biodiversity and geodiversity assets of the Plan area, including flora and fauna;
- **SA Objective 4. Landscape:** Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening its distinctiveness;
- **SA Objective 5. Pollution and waste:** Ensure sustainable management of waste whilst minimising the extent and impacts of water, air and noise pollution.
- **SA Objective 6. Natural resources:** Protect, enhance and ensure the efficient use of the Plan area's land, soils and water;
- **SA Objective 7. Housing:** Provide a range of housing to meet the needs of the community;
- **SA Objective 8. Health:** Safeguard and improve 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 choice and efficiency of sustainable transport in the Plan area and reduce the need to travel;
- **SA Objective 11. Education:** Improve education, skills and

⁷ Sustainability Appraisal of the South Staffordshire Local Plan Review – Preferred Options Plan, Regulation 18 (III) SA Report, August 2021

qualifications in the Plan area; and

- **SA Objective 12. Economy and employment:** Support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.

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

6.3 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 • 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 6.1: Guide to scoring significance of effects

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

Land off Blackhalve Lane – Site Ref: 486b, 486c

6.5 Land at Linthouse Lane is considered within the SA as '*Land off Blackhalve Lane*' – Site Refs: 486c (draft allocation SA3) and 486b (land promoted by Taylor Wimpey to be safeguarded).



6.6 This includes an assessment of the nature and magnitude of the impact of the development, both pre- and post-mitigation. These assessments are reproduced in Figures 6.1 and 6.2 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
486a/b	+/-	-	-	-	-	-	+	-	-	-	-	+
486c	+/-	-	-	-	-	-	+	-	-	-	-	+

Figure 6.1: Significance of effects pre-mitigation, Site Refs: 486b and 486c

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
486a/b	+/-	+	+/-	-	-	-	+	-	0	-	-	+
486c	+/-	+	+/-	-	-	-	+	-	0	-	-	+

Figure 6.2: Significance of effects post-mitigation, Site Refs: 486b and 486c

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

6.8 The SA sets out that Sites 486b and 486c are considered to result in a 'high' level harm to the Green Belt, as concluded by the Green Belt Study which supports the LPR⁸.

6.9 In respect of other aspects, the sites were only found to have 'low-moderate' landscape sensitivity or a 'minor negative' impact on landscape character, views from the public right of way network, views for local residents,

⁸ South Staffordshire Green Belt Study – Stage 1 and 2 Report (LUC), July 2019

urbanisation of the countryside and coalescence).

6.10 The finding that the site would have a Major Negative impact upon landscape and townscape accordingly appears to be based upon the finding that the site 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, 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.

6.11 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 contribution 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 (ie 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	All parcels are considered to make an equal contribution to this purpose.	Strong

derelict and other
 urban land



Table 6.1: Land Parcel S20Fs1 Contribution Towards Green Belt Purposes

6.12 However, it should be stressed that parcel S20Fs1 contains a wider extent of land than just Land at Linthouse Lane; the parcel also includes tracts of land to the northeast, up to and including land adjacent to Essington, as illustrated below.

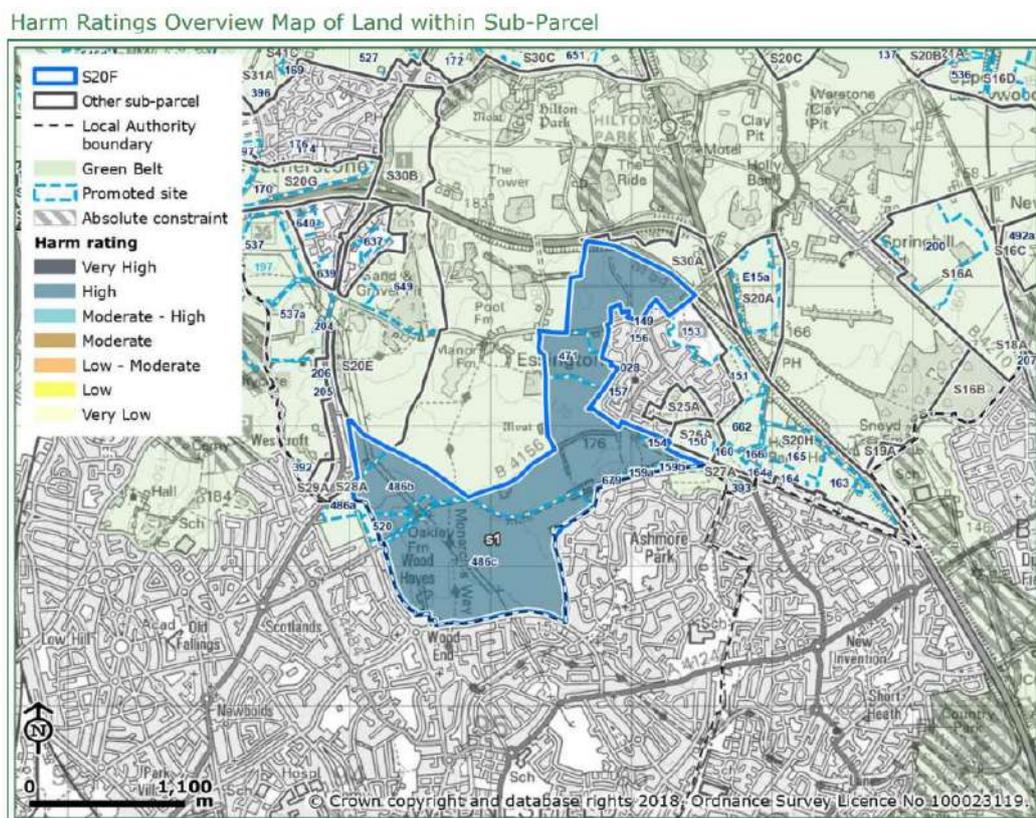


Figure 6.3: Green Belt Harm Rating for Sub-Parcel Ref: S20F (South Staffordshire Green Belt Study July 2019)

6.13 In this regard, it is contended by Taylor Wimpey that Land at Linthouse Lane 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.

- 6.14 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.
- 6.15 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 both sites in respect of Landscape and Townscape.
- 6.16 Taylor Wimpey also disputes the Major Negative ('--') post-mitigation score attributed to Site 486b and the Minor Negative ('-') score attributed to site 486c in respect of education.
- 6.17 SSDC has identified site 486c as a strategic allocation within the draft LPR. The promotional material prepared by Taylor Wimpey in support of site 486c includes land for a two-form entry primary school, which would support education provision from residents of both sites. It is therefore contended that this mitigation is sufficient to make the overall result from both sites Negligible ('0').
- 6.18 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."

-
- 6.19 The scale of both sites 486b and 486c are well in excess of 100 dwellings (486c is allocated in the draft LPR for 1,976 dwellings) and should both accordingly score a Major Positive ('++') score against the housing objective.

7.0 Land at Linthouse Lane

7.1 Taylor Wimpey is currently in control of land to the north of Linthouse Lane and to the south of the dismantled railway line, 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 LPR as Strategic Housing allocation '*Land at Linthouse Lane*', in addition to a further 20 hectares of land (approx.) which Taylor Wimpey is promoting as land to be released from the Green Belt and safeguarded for development beyond the plan period.

Site Description

7.2 The land identified as a draft strategic allocation under Policy SA3 land represents a logical and sustainable extension to the existing Major Urban Area that provides an opportunity for delivering approximately 2,100 to 2,450 new homes with associated supporting infrastructure to the south of Blackhalve Lane. A potential future phase of development is identified to the north of Blackhalve Lane that could deliver an additional 325 to 350 dwellings. It is suggested that this land is also released from the Green Belt and then be safeguarded for delivery in a future local plan period.

7.3 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 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.

7.4 An illustrative masterplan has been prepared to introduce an initial proposal, providing an indication of how the site could be delivered and function as a natural sustainable, urban extension to Wolverhampton. This includes a 20m offset to the existing power lines, retention of the existing public rights of way and vegetation.

7.5 The Illustrative Masterplan identifies the following key features for land to the north of Linthouse Lane on land where Taylor Wimpey has secured an interest:

- Circa. 2,100-2,450 dwellings with a potential future phase that could deliver up to a further 350 dwellings (to be safeguarded);
- Provision of land for the delivery of a number of potential community uses, including the provision of a new 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.

7.6 A Development Vision Document has been prepared by Taylor Wimpey which provides further detail in respect of the site and introduces the illustrative masterplan. This is included at **Appendix 2** to this representation.

Green Belt

7.7 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.

7.8 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:

"The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation at Wednesfield, a moderate contribution to maintaining the separation between the neighbouring towns of Wednesfield and Great Wyrley, and a strong contribution to preventing encroachment on the countryside. The sub-parcel is adjacent to the settlement edge of the suburbs of Wednesfield to the east, south and west, however it retains a strong relationship with the open countryside to the north. Some of the land lies in the gap between these suburbs and the inset village of Essington, however the gap between the two has already essentially been breached by the housing development along High Hill Road. The existing Green belt boundaries at Wednesfield and Essington are not strongly defined, however given that there are no obvious stronger alternatives, releasing land here would serve to weaken the integrity of Green Belt land."

- 7.9 Taylor Wimpey contend that the site is bounded on three of its four sides by residential properties, which form part of the Black Country conurbation (eastern, western and southern boundaries). To the north, the site is bounded in part by Blackhalve Lane, a dismantled railway line and further existing residential properties. These features present an opportunity to further strengthen this boundary, through the provision of open space and landscaping features.
- 7.10 The site would therefore be well contained and not encourage sprawl beyond the period of the Local Plan Review.
- 7.11 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 Indicative 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.

- 7.12 It is also noted that land at Linthouse Lane 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

- 7.13 South Staffordshire District Council's Landscape Study (2019) finds that the site has 'moderate' sensitivity in landscape terms.

- 7.14 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.

- 7.15 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. The site is currently included as part of the West Midlands Green Belt. There are no landscape specific designations which cover the site or the immediate area.

- 7.16 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.

7.17 The development consequently incorporates 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.

7.18 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 regards masterplanning to identify constraints and opportunities at a more detailed level.

7.19 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

7.20 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.

7.21 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.

7.22 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.

7.23 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 development at land off Linthouse Lane.

- 7.24 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

- 7.25 The site lies in Flood Zone 1, the area at least risk from flooding.
- 7.26 Surface water drainage is proposed to be accommodated through the provision of a series of balancing ponds located around the site. The Illustrative Masterplan, included at Appendix 3, identifies the provision of balancing ponds through a network of green infrastructure.

Highways (Accessibility to the Site)

- 7.27 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.
- 7.28 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.
- 7.29 Travel by rail is achievable as part of a multi-modal trip i.e. park and ride and cycle and ride. There are hourly services to local destinations including

Birmingham New Street which provides onward travel opportunity to destinations across the country.

7.30 Access to the site can be achieved from the surrounding highway network, including Linthouse Lane, Blackhalve Lane, Cannock Road and Kitchen Lane. towards the south-western end of the site. There are a number of options and significant potential in terms of achieving safe, controlled and appropriate vehicular access to the site.

7.31 The Illustrative Masterplan identifies the following access points, but it should be noted that these are not necessarily exclusive locations:

- Proposed vehicular access via Linthouse Lane;
- Proposed vehicular access via Kitchen Lane;
- Proposed vehicular access via Blackhalve Lane;
- Proposed vehicular access via Cannock Road; and
- Proposed change of priority along Wood Hayes Road through the introduction of a new junction providing east west vehicular connectivity.

7.32 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.

7.33 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

- 7.34 Technical work has been undertaken by the Environmental Development Partnership Ltd to guide initial proposals on land off Linthouse Lane having regard to ecological sensitivities pertaining to the site and identifying opportunities and constraints which may influence development.
- 7.35 The study confirmed that there are no statutorily designated nature conservation sites within the red line boundary shown at Appendix 1, however, there is a Special Area of Conservation (SAC) of European importance within 10km and two Local Nature Reserves (LNRs) of local importance within 2km.
- 7.36 Cannock Extension Canal SAC lies 6.3km northeast of the site and contains good water quality supporting floating water plantain and a diverse dragonfly and damselfly assemblage. Identified threats to the quality of this SAC that could occur are: pollution to groundwater, air pollution, air-borne pollutants and invasive non-native species.
- 7.37 Due to the spatial separation of the SAC from land off Linthouse Lane, it is unlikely that the proposed development would result in any of the identified threats to the SAC arising.
- 7.38 Rough Wood Chase LNR lies 2km east of the site. There is no ecological connectivity to this woodland and wetland area, being separated from land off Linthouse Lane by the M6. In addition, there is no hydrological connectivity. The proposal is not considered to have a potential impact on this LNR.

- 7.39 Waddens Brook LNR lies 2km south of land off Linthouse Lane and is regionally important for its great crested newt population and populations of other amphibians. As there is no hydrological or ecological connection between the LNR and the site and the 2km of separation contains residential development and the Wyrley and Essington Canal, the proposal is not considered to have a potential impact on this LNR.
- 7.40 Land off Linthouse Lane 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.
- 7.41 Oakley Farm is designated due to the presence of field margins on historic maps. During the Extended Phase 2 Survey, no habitats of importance were noted, with the grassland and hedgerows being species poor. Therefore, in ecological terms, development in this area would not result in a significant loss in biodiversity either within the proposal site or within the PSI at Oakley Farm.
- 7.42 Ashmore Lodge is the dismantled railway which runs through the proposed site. A majority of this dismantled line is lined with trees with some parts covered in semi-improved grassland, providing a linear feature of local ecological value. The proposal offers the opportunity to include:
- Additional planting of native tree species;
 - Creation of diverse wildflower meadows in open areas on the line and in the buffer to this line; and
 - Removal of the giant hogweed by an experienced and qualified contractor.

-
- 7.43 If these opportunities were delivered, this would ensure no significant impacts would occur on any of the non-statutory designations within the potential zone of influence of the site and would result in an overall enhancement in line with local and national policy.
- 7.44 The remaining habitats within the site are predominantly of low intrinsic ecological value and present good opportunities for enhancement. They are not a constraint to development capacity in their own right but have the potential to support protected species.
- 7.45 The possible presence of breeding birds, bats and great crested newts will need to be determined through further surveys, however, it is considered that, even if these protected species were found to be present, the populations could easily be safeguarded through sensitive scheme design and appropriate mitigation measures, and would not represent an 'in principle' constraint to development.
- 7.46 The initial technical work considers the site provides sufficient flexibility to ensure compliance with planning policy at all levels and to avoid 'significant harm' to biodiversity. Furthermore, a sensitively designed development incorporating appropriate mitigation and enhancement has the potential to deliver a significant net gain in biodiversity.
- 7.47 Natural England's Land Classification Map for the West Midlands Region (ALC004) shows that the majority of the site comprises undefined Grade 3 'Good to Moderate' quality agricultural land. It is noted that the majority of land around Wolverhampton and the wider Black Country urban area also comprises Grade 2 and 3 agricultural land.
- 7.48 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

- 7.49 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.
- 7.50 A full Phase 1 Environmental Risk Assessment has been completed for the site. The British Geological Map for the area indicates the site is underlain by superficial deposits of Glacial Till (variable but predominantly cohesive strata), which overlay solid strata that vary across the site.
- 7.51 The Phase I Environmental Risk Assessment for the site has been undertaken which identifies that it is unlikely that the site would be classified as contaminated land.
- 7.52 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 (B4156), which also passes through part of the site. 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 Woodent Road and Cannock Road.
- 7.53 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.
- 7.54 Consequently, it is unlikely noise will have a significant adverse impact on the development of this site.

Site-Specific Opportunities

7.55 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;
- Significant provision of Green Infrastructure to include a new Country Park, providing compensatory provision for Green Belt release;
- 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.

Suitability

7.56 The information set out above, read in conjunction with the appended illustrative masterplan, demonstrates that land off Linthouse Lane is a suitable site.

Deliverability

7.57 There is an agreement in place between the landowner and Taylor Wimpey to facilitate the development of the site.

7.58 A considerable amount of technical work has been undertaken to demonstrate the deliverability of land off Linthouse Lane. Taylor Wimpey can confirm that this work concludes that there are no physical or other constraints likely to render the site undeliverable within the proposed Plan period to 2036. The site is available now.

-
- 7.59 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.
- 7.60 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.

8.0 Conclusion

8.1 This representation is made by Pegasus Group on behalf of Taylor Wimpey UK Ltd to the South Staffordshire Local Plan Review, Preferred Options (Regulation 18) consultation. This representation relates to land at Linthouse Lane, which Taylor Wimpey is promoting for residential-led development.

8.2 Taylor Wimpey supports the LPR produced by SSSC, including the principle of contributing towards unmet development needs arising from within the GBBCHMA. Taylor Wimpey also supports the allocation of Land at Linthouse Lane for residential-led development.

8.3 The information contained within this representation, read in conjunction with the appended Development Vision Document, demonstrates that land at Linthouse Lane is a suitable and deliverable site for residential development, subject to its release from the Green Belt.

8.4 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.

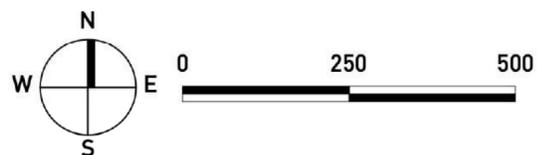
APPENDIX 1

Copyright Pegasus Planning Group Ltd. Crown copyright. All rights reserved. Ordnance Survey Copyright. Licence number 100142039. Promap. Licence number 01020446. EnrgSite. Licence number 0102031673. Standard OS licence rights conditions apply. Pegasus accepts no liability for any use of this document other than for its original purpose, or by the original client, or following Pegasus' express agreement to such use. T 01255 647171 www.pegasuspg.co.uk

KEY

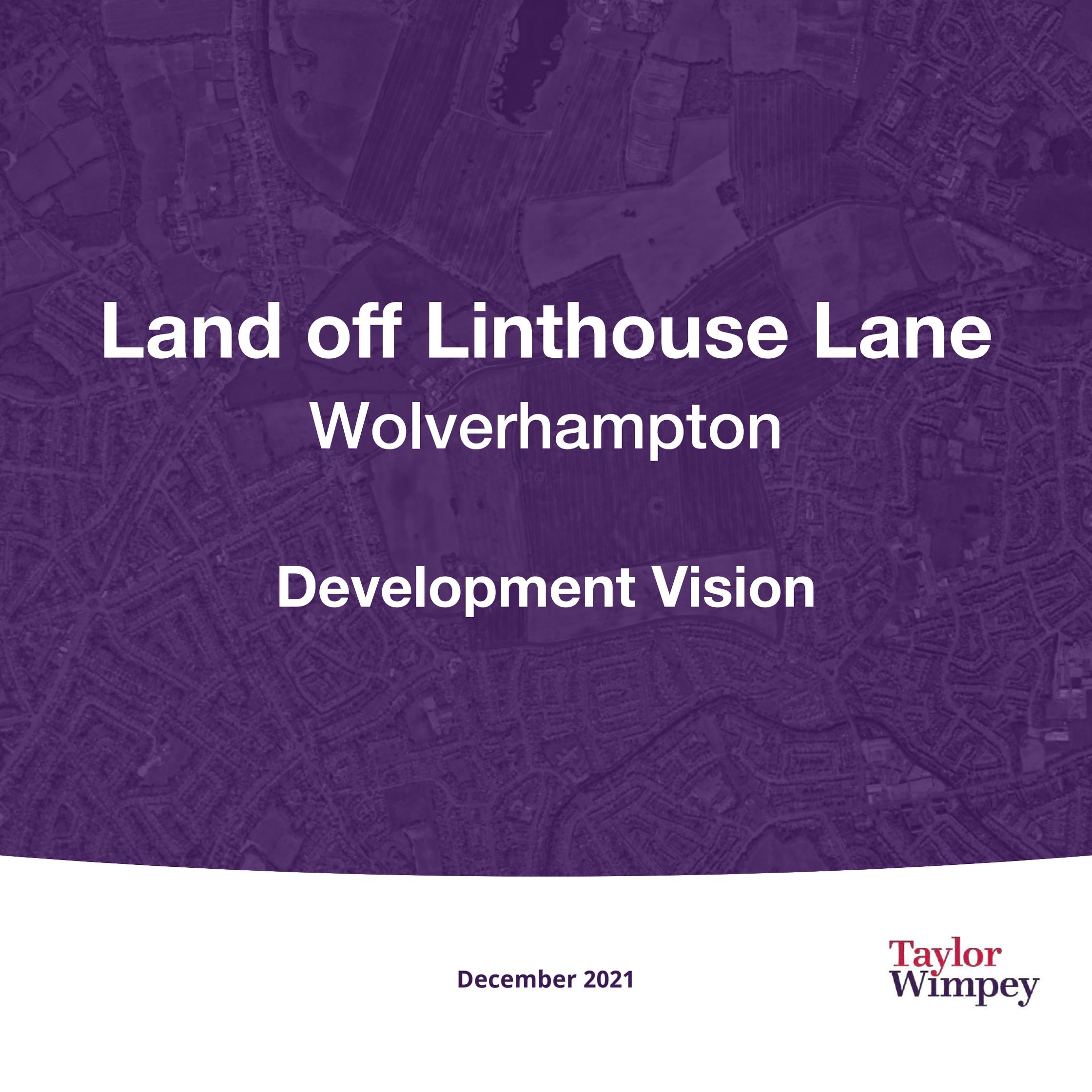
 SITE LOCATION
144.40 HECTARES
356.83 ACRES

 BOUNDARY LINE BETWEEN
SOUTH STAFFORDSHIRE DISTRICT AND
WOLVERHAMPTON BOROUGH



LAND OFF LINTHOUSE LANE, WOLVERHAMPTON - SITE LOCATION PLAN

APPENDIX 2



Land off Linthouse Lane Wolverhampton

Development Vision

December 2021

Taylor
Wimpey

Figures

Figure 1:	Aerial Site Plan.....	1
Figure 2:	Strategic Location Plan.....	5
Figure 3:	Site Context Plan.....	8
Figure 4:	Land Control Plan.....	10
Figure 5:	Core Strategy Policy Map.....	17
Figure 6:	Green Belt Plan.....	23
Figure 7:	Accessibility to Local Facilities Plan.....	33
Figure 8:	Local Public Transport Accessibility Plan.....	35
Figure 9:	Indicative Green Belt Edge.....	37
Figure 10:	Preliminary Landscape Analysis.....	38
Figure 11:	Site Analysis Plan.....	42
Figure 12:	Framework and Conceptual Layout Plan.....	43
Figure 13:	Illustrative Masterplan.....	44
Figure 13A:	Fallings Park.....	45
Figure 14:	Access and Movement Plan.....	46
Figure 15:	Character Areas Plan.....	51
Figure 16:	Storey Heights Plan.....	63
Figure 17:	Phasing Plan.....	64
Figure 18:	Green Infrastructure.....	65

Contents

Executive Summary

1. Introduction.....	1
2. The Site and Surrounding Area.....	5
3. Planning Policy.....	17
4. Is there Need for Green Belt Development?.....	23
5. Is the Site Sustainable?.....	31
6. What is the Vision for the Site?.....	41
7. Conclusion.....	71

Appendices

Appendix 1: Taylor Wimpey UK Limited.....	75
---	----



Pegasus Design
5, The Priory
Old London Road
Canwell
Sutton Coldfield
B75 5SH
www.pegasusgroup.co.uk | T: 0121 308 9570

Prepared by Pegasus Group Ltd
Prepared on behalf of Taylor Wimpey plc.
December 2021 - Project code: BIR.5060_13G
Contact: Pegasus Design: James Walch

COPYRIGHT The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Ltd. Crown copyright. All rights reserved. Licence number 100042093.

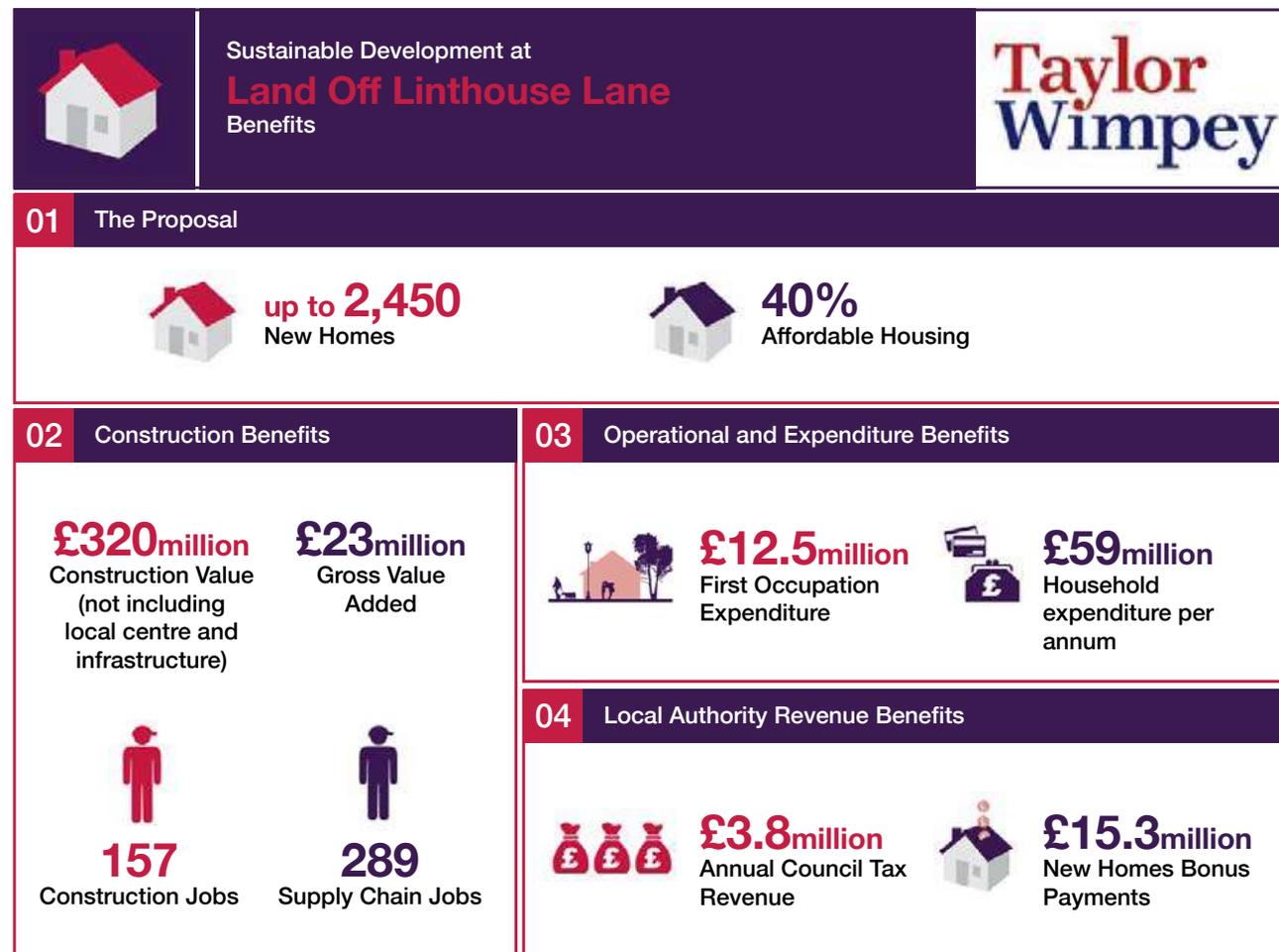
Executive Summary

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 an ideal opportunity to create a sustainable, distinctive and attractive residential development. The site is promoted for residential led development in response to both South Staffordshire District Council's Local Plan Review and the review of the Black Country Core Strategy.

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 draft (Regulation 18) Black Country Plan allocates land which includes part of the site for residential 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 release of the site from the Green Belt would not compromise the five purposes of the Green Belt as set out within national planning policy.
- 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 Indicative Masterplan demonstrates that the site could accommodate between approximately 2,100 and 2,450 dwellings, along with public open space and supporting infrastructure.
- The Indicative Masterplan identifies a potential future phase that can deliver an additional 300 - 350 dwellings to the north of Blackhalve Lane.
- The Indicative Masterplan also includes land for a new two-form entry primary school.
- The development is truly 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 and the local community in designing a high-quality development which delivers real benefits for the area.

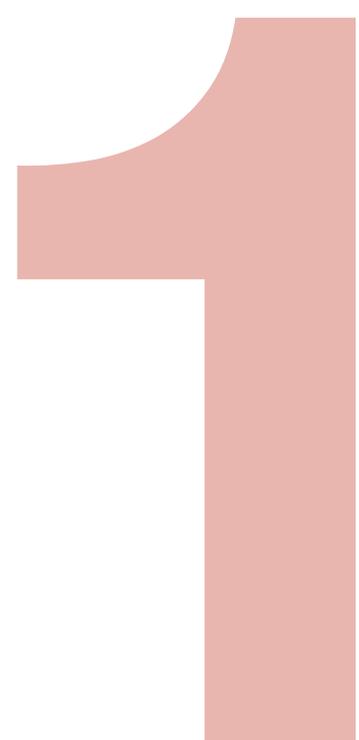


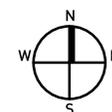
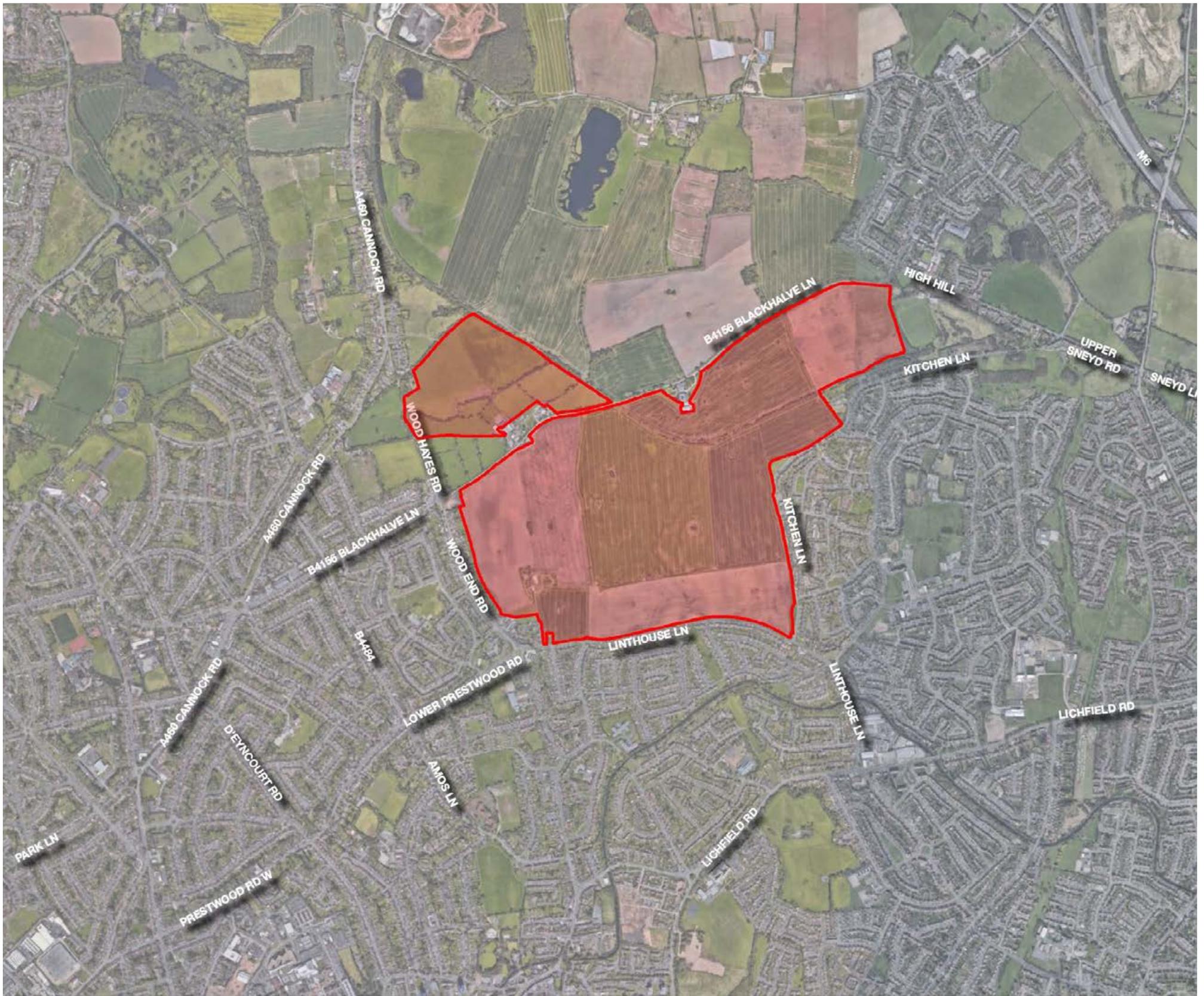



**DEVELOPMENT
FRAMEWORK**

1

Introduction





**FIGURE 1:
AERIAL SITE PLAN**

1. Introduction

Land off Linthouse Lane, Wolverhampton, provides an ideal opportunity to deliver a sustainable, attractive and distinctive residential development which will deliver homes to help meet the needs of the local community 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 the dismantled railway. The majority of the site is located within South Staffordshire District, however, the western most element falls 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 potential for good access to Wolverhampton via a number of vehicular, public transport and pedestrian connections.

Taylor Wimpey is a national and respected housebuilder who is committed to working with South Staffordshire District Council, in conjunction with the Black Country Authorities and the local community, to design a quality and sympathetic development which delivers social, environmental and economic benefits for the wider area.

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, the Black Country Authorities and the local community to refine the proposals as appropriate. The vision will evolve following further consultation and more detailed technical work.

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.

This Development Vision Document has been prepared in the context of South Staffordshire District Council's Local Plan Review which is to address unmet housing needs in both South Staffordshire and the wider Black Country region, in light of the unmet housing need of the Greater Birmingham and Black Country Housing Market Area. This Document has also been prepared in the context of the Black Country Core Strategy Review, which is undergoing 'Regulation 18' (Draft Plan) Consultation between 16th August and 11th October 2021.

Taylor Wimpey has appointed a consultant team to assist in producing an appropriate development vision for the site. The principal team members comprise Pegasus Group (Planning, Masterplanning and Landscape Consultants), BWB Consulting, EDP (Arboriculture, Ecology, Heritage) and Vectos (Transport).

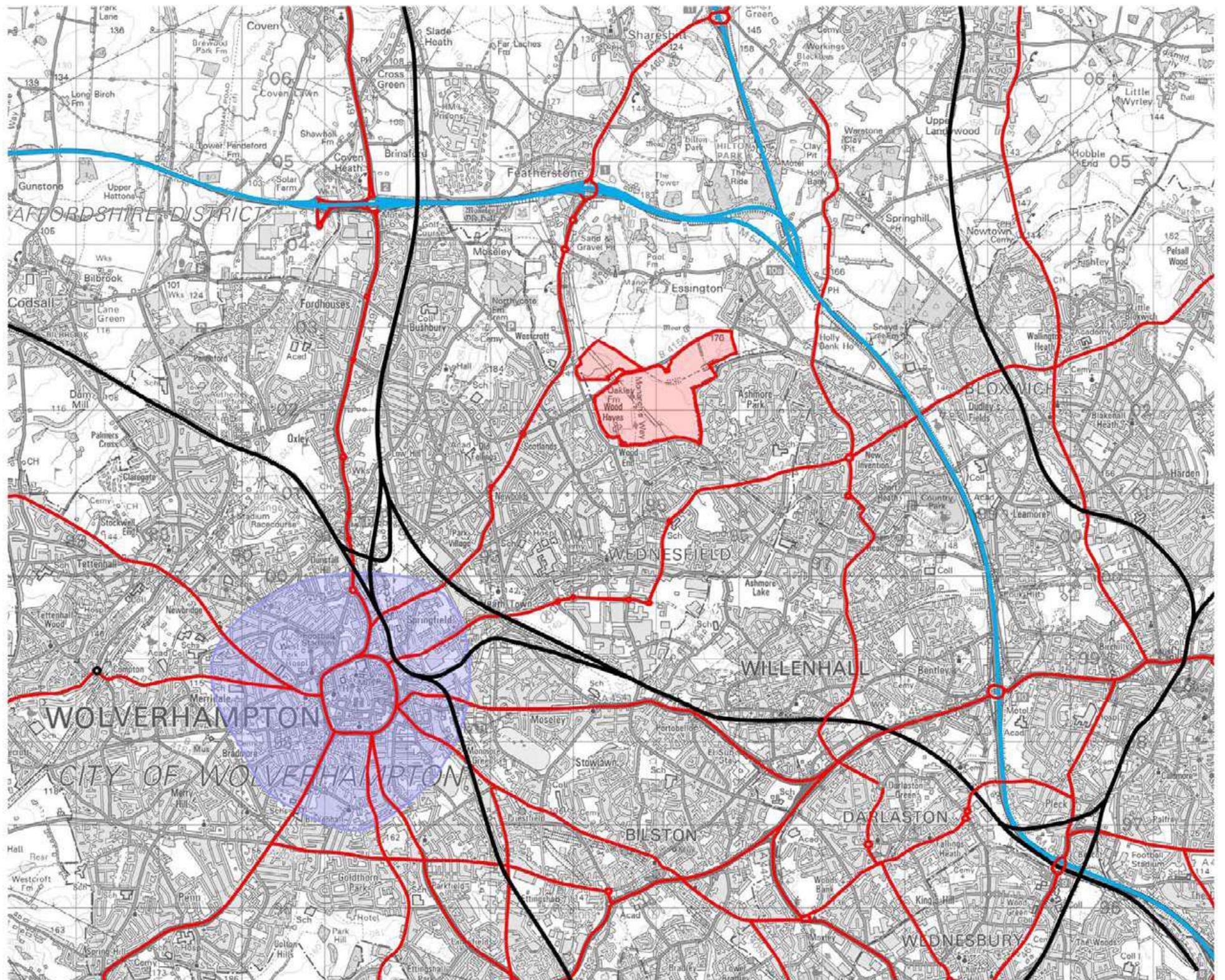
This document includes the following sections:

- Section 2 – The Site and Surrounding Area
- Section 3 – Planning Policy
- Section 4 – Is there a Need for Green Belt Development?
- Section 5 – Is the Site Sustainable?
- Section 6 – What is the Vision for the Site?
- Section 7 – Conclusion

2

The site and surrounding area

2



KEY

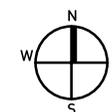
 Taylor Wimpey Controlled Land
356.83 Acres/144.40 Hectares

 Wolverhampton City Centre

 Railway Lines

 Motorway

 'A' Roads



**FIGURE 2:
STRATEGIC LOCATION PLAN**

2. The site and surrounding area

Whilst the majority of the site is located within South Staffordshire District, it lies immediately adjacent to the Black Country city of Wolverhampton, which itself comprises a separate Authority, covered by the Black Country Core Strategy. Within the Strategy, Wolverhampton is identified 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

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, with the potential to accommodate a number of further stops within the site itself. Overall, there is significant opportunity to travel by public transport to Wolverhampton and beyond.

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.

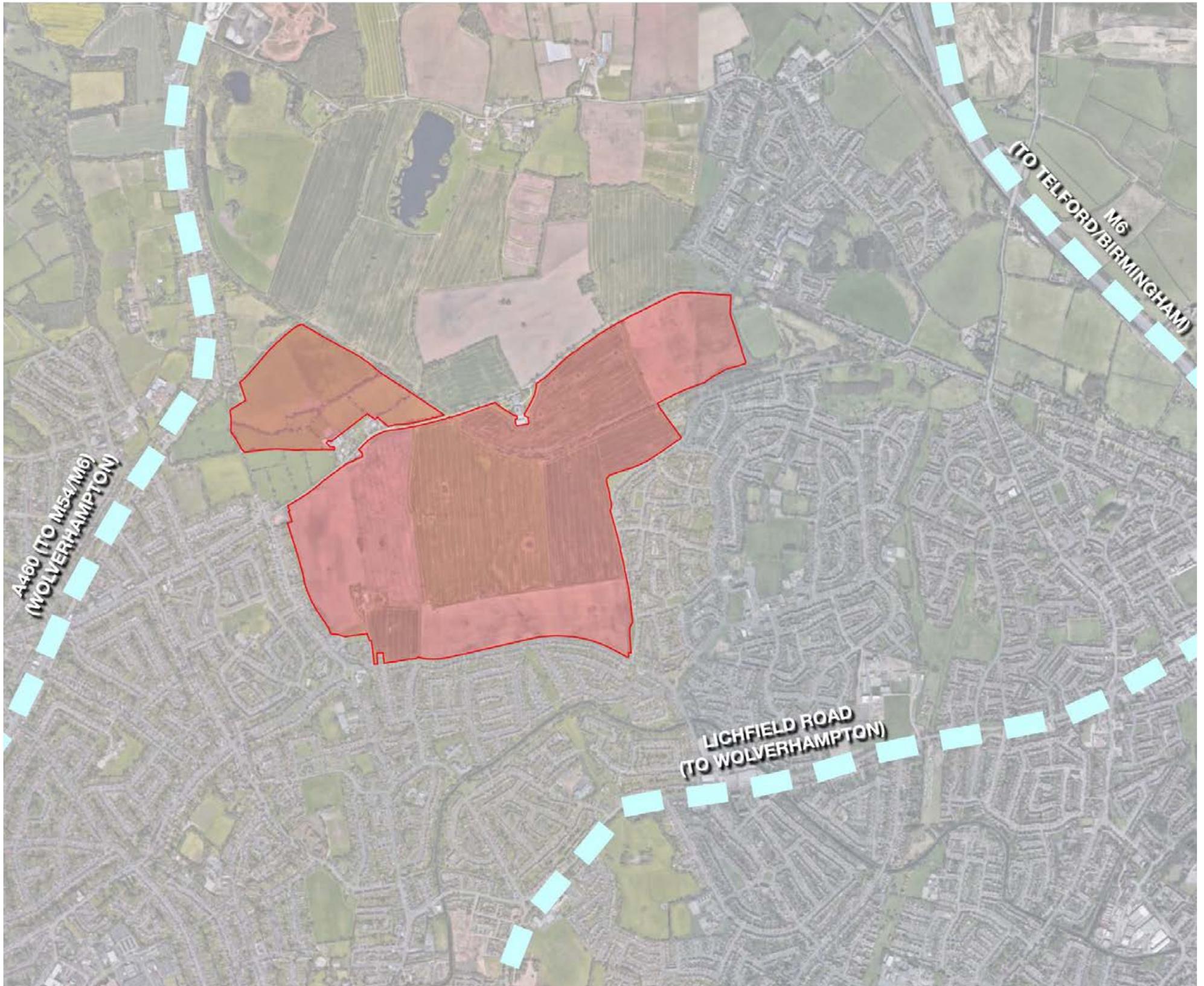
The settlement historically grew as part of the woollen trade, followed by coal and iron industry. A large number of council houses were constructed in Wolverhampton following the First and Second World Wars, with a number of flats and apartments being constructed in the 1960s. The area immediately surrounding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



PHOTOGRAPHS OF THE SITE AND ADJOINING ROADS/INFRASTRUCTURE

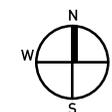
1. View North, Wood Hayes Road
2. Junction with Blackhalve Lane and Wood Hayes/End Road
3. Linthouse Lane, Wood End Road, Lower Priestwood Road roundabout
4. View East, Linthouse Lane
5. Public right of way running between Blackhalve Lane and Linthouse Lane
6. Kitchen Lane





KEY

- Taylor Wimpey Controlled Land
356.83 Acres/144.40 Hectares
- Strategic route



**FIGURE 3:
STRATEGIC ROUTE PLAN**

VIEW AROUND THE SITE BOUNDARIES TO THE SOUTH



Land Control

The site, edged in red on **Figure 4**, comprises approximately 144.40ha 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 comprised in part of Blackhalve Lane and, in part, of a number of hedgerows and field boundaries. The smaller parcel of land to the north of Blackhalve Lane is bounded by Old Hampton Lane to the north and Wood Hayes Road to the west. The land adjoins the existing Major Urban Area where these roads intersect. The site is currently located within the Green Belt. Open countryside lies beyond the site's northern boundary.

The site is bisected by a high voltage electricity line running north-south from Old Hampton Lane to Linthouse Lane.

There is an existing Public Right of Way (PRoW) running north-south from Blackhalve Lane to Linthouse Lane and a dismantled railway walk crossing the north-western section of the site.

Character Areas

Three broad character areas are identified within the vicinity of the site as set out overleaf.

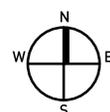
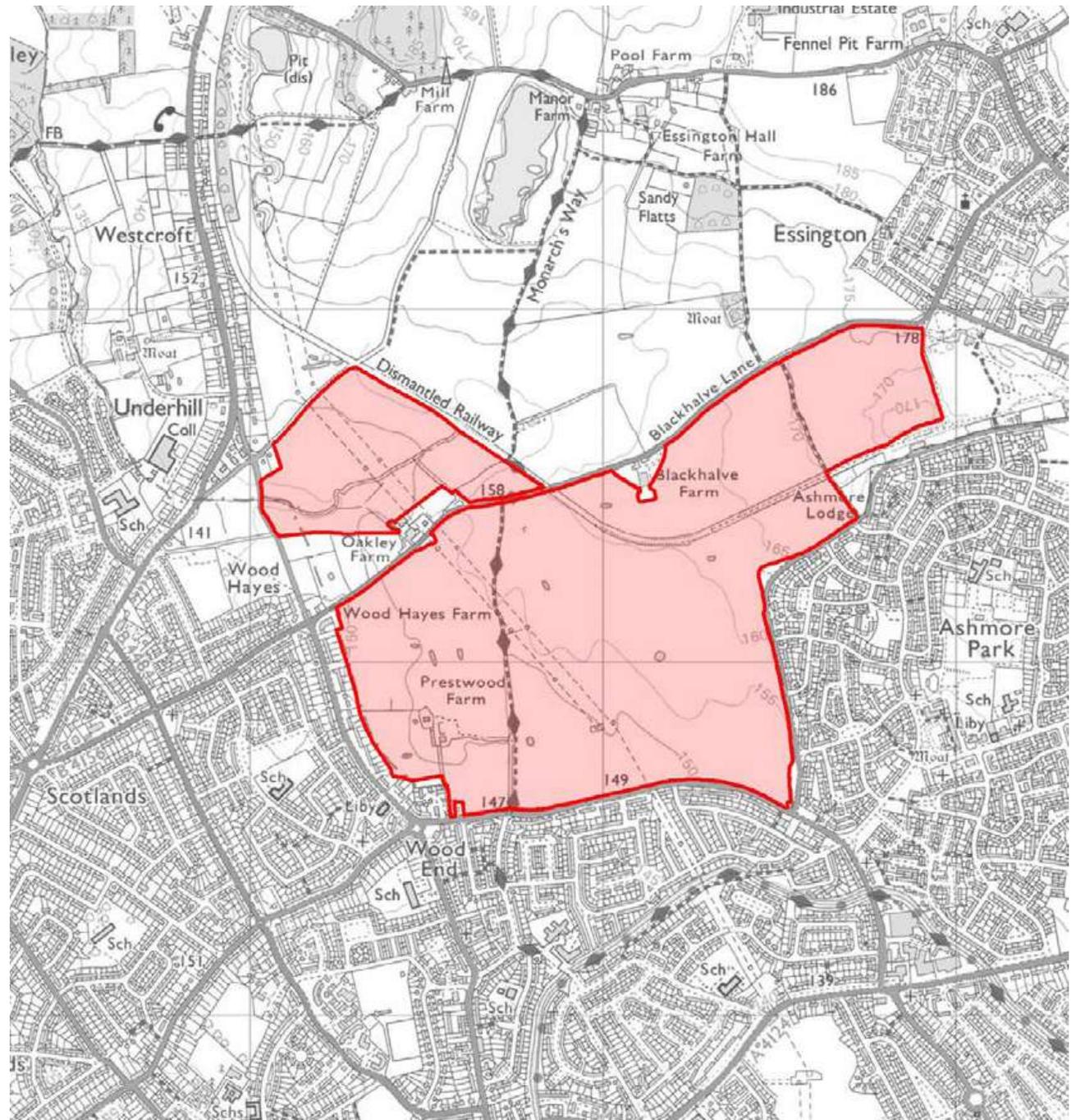


FIGURE 4:
LAND CONTROL PLAN

CA1

1850's - 1950's

1. Priestwood Farm House
2. Lynt House - Linthouse Lane
3. Linthouse Lane
4. Kitchen Lane
5. High Hill, Essington
6. High Hill, Essington



CA2

1960's, 70's & 80's

1. Wood End Road
2. Wood End Road
3. Linthouse Lane
4. Linthouse Lane
5. Springhill Road
6. Sudbury Close



CA3

Post 1990's

1. Wood Hayes Croft
2. Wood Hayes Road
3. Linthouse Lane
4. Buttermere Drive



Services and Facilities

There are a number of local convenience stores within the vicinity of the site, with the nearest supermarkets being located toward either within Wolverhampton city centre to the south or Bloxwich to the east.

There are a number of primary schools within 1km of the site, including: Long Knowle Primary School; Wood End Primary School and Nursery; D'Eyncourt Primary School; Berrybrook Primary School; and, Corpus Catholic Primary School. Furthermore, Morteton Secondary School, Our Lady and St Chad Catholic Academy and Coppice Performing Arts School are located within 2km of the site, whilst Westcroft School caters for children of all ages with special educational needs.

There are a number of doctor's surgeries within a 2km radius of the site, as well as a number of dentists.

The site is therefore well situated in relation to local services and facilities.

1. Wood Hayes Rd parade of shops
2. Betany Chapel
3. Wood End Rd parade of shops
4. The Pheasant Public House - Linthouse Lane
5. Long Knowle Library
6. Linthouse Lane Bus Stop



3

Planning policy

3

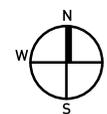
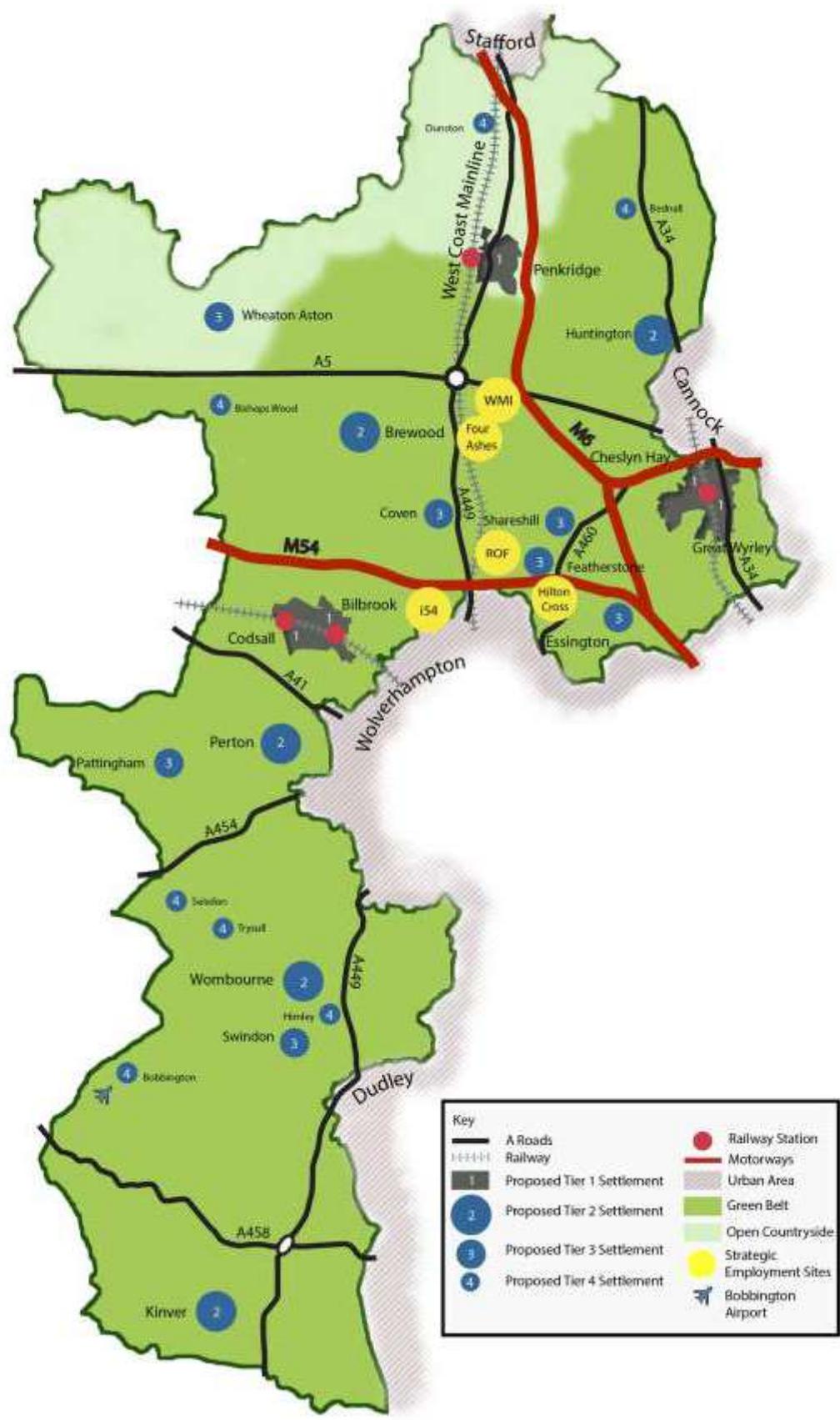


FIGURE 5:
SOUTH STAFFORDSHIRE LOCAL
PLAN REVIEW CONTEXT MAP

3. Planning policy

National Planning Policy

A new 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.

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 243 dwellings per annum, including an uplift to take account of market signals and affordability.

Similarly, the standard method indicates that, collectively, the four Black Country authorities are obliged to deliver 4,004 dwellings per year, including a 35% uplift applied to the City of Wolverhampton.

South Staffordshire Local Plan Review

The South Staffordshire development plan currently comprises the South Staffordshire Core Strategy (adopted in December 2012) and the South Staffordshire Site Allocations Document (adopted in September 2018). The current Strategy covers the period 2006-2028 and sets a housing requirement of at least 3,850 new homes to be delivered within this period which, at 175 dpa, is considerably lower than the need that has now been identified.

The Site Allocations Document (SAD) commits the District Council to carrying out an early review of the development plan in order to respond to the increasing need for development, both within South Staffordshire and the wider housing market area. The SAD also requires a new Local Plan to be submitted for an Examination in Public (EiP) by 2021.

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 2038. The review provides an opportunity to address housing need, reflect new national planning guidance and provide a meaningful contribution to meeting needs of neighbouring authorities, where it can be demonstrated that they are unable to do so.

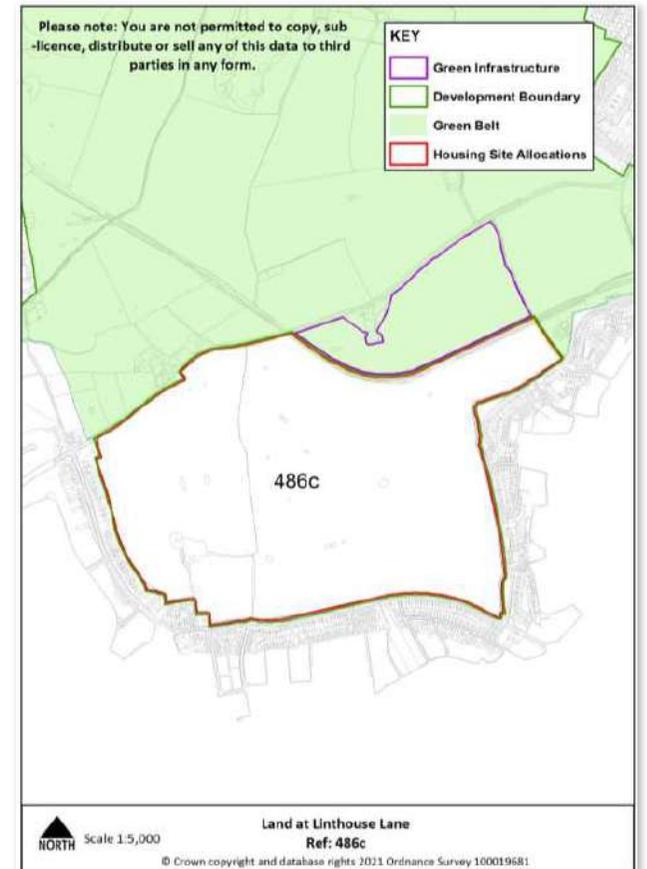
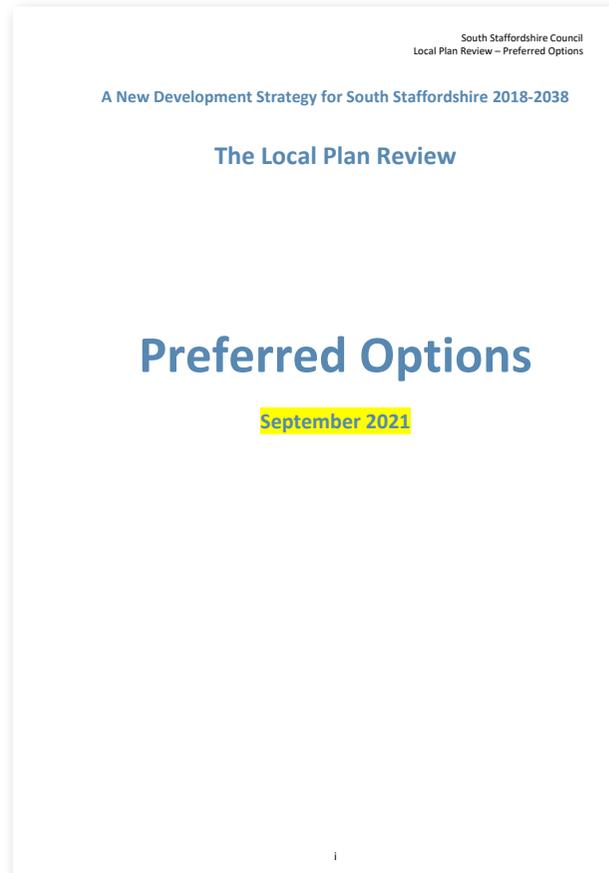
The Local Development Scheme (LDS) published in June 2020, proposed the following timetable for the Review:

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

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

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

This includes the allocation of Land North of Linthouse Lane, Wolverhampton, for a minimum of 1,200 homes to be delivered within the plan period, with an additional 756 dwellings to be delivered beyond the plan period (1976 homes total).



Black Country Local Plan Review

The Black Country Local Authorities have embarked on a review of the Core Strategy, also in response to the duty-to-cooperate and the unmet housing needs of the Greater Birmingham Housing Market Area.

The Black Country Authorities published the Draft Black Country Plan (Regulation 18) Consultation document in August 2021, to be consulted upon until 11th October 2021.

The Draft Plan includes part of the site under Taylor Wimpey's control (Ref WOH 263) as part of strategic housing allocation CSA.2 "Fallings Park". This land is to be removed from the Green Belt and allocated for 303 homes and public open space. Of this, around 80 dwellings are to be delivered by Taylor Wimpey on Parcel WOH 263.

Taylor Wimpey will continue to engage with the Black Country Authorities regarding the Black Country Plan and housing allocation CSA.2.

Evidence

It is recognised that the Local Plan Review will be informed by a range of evidence to inform the spatial development strategy, policies and site selection.

Housing Need: National guidance states that assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure, and preparing policies to address this such as site allocations. The NPPF expects strategic policy-making authorities to follow the standard method as a starting point in determining the number of homes needed in an area.



Policy CSA2 – Fallings Park Strategic Allocation

An uplift in housing need may be appropriate where growth strategies are in place; where strategic infrastructure is planned that could support new homes; or where a Local Authority has agreed to meet unmet need from neighbouring authorities.

Cross Boundary Needs: Local Planning Authorities have a duty to cooperate with neighbouring authorities and other prescribed bodies on strategic matters that cross administrative boundaries. The most significant cross boundary issue relates to unmet housing needs within the Greater Birmingham Housing Market Area (GBHMA) in which South Staffordshire District lies.

South Staffordshire District Council and the Black Country Authorities have worked with the other Local Planning Authorities within the Greater Birmingham Housing Market Area (GBHMA) to consider the housing need across the HMA and consider the strategic development options for meeting this identified need. The Strategic Growth Study (SGS) identified between 256,00 and 310,000 new homes are required to meet the HMA's needs between 2011 and 2036 and a cumulative shortfall in the supply of 60,855 planned dwellings across the HMA to 2036. This document identifies a number of growth options within local authority areas to be tested through local plan reviews. Many of these options have implications for Green Belt.

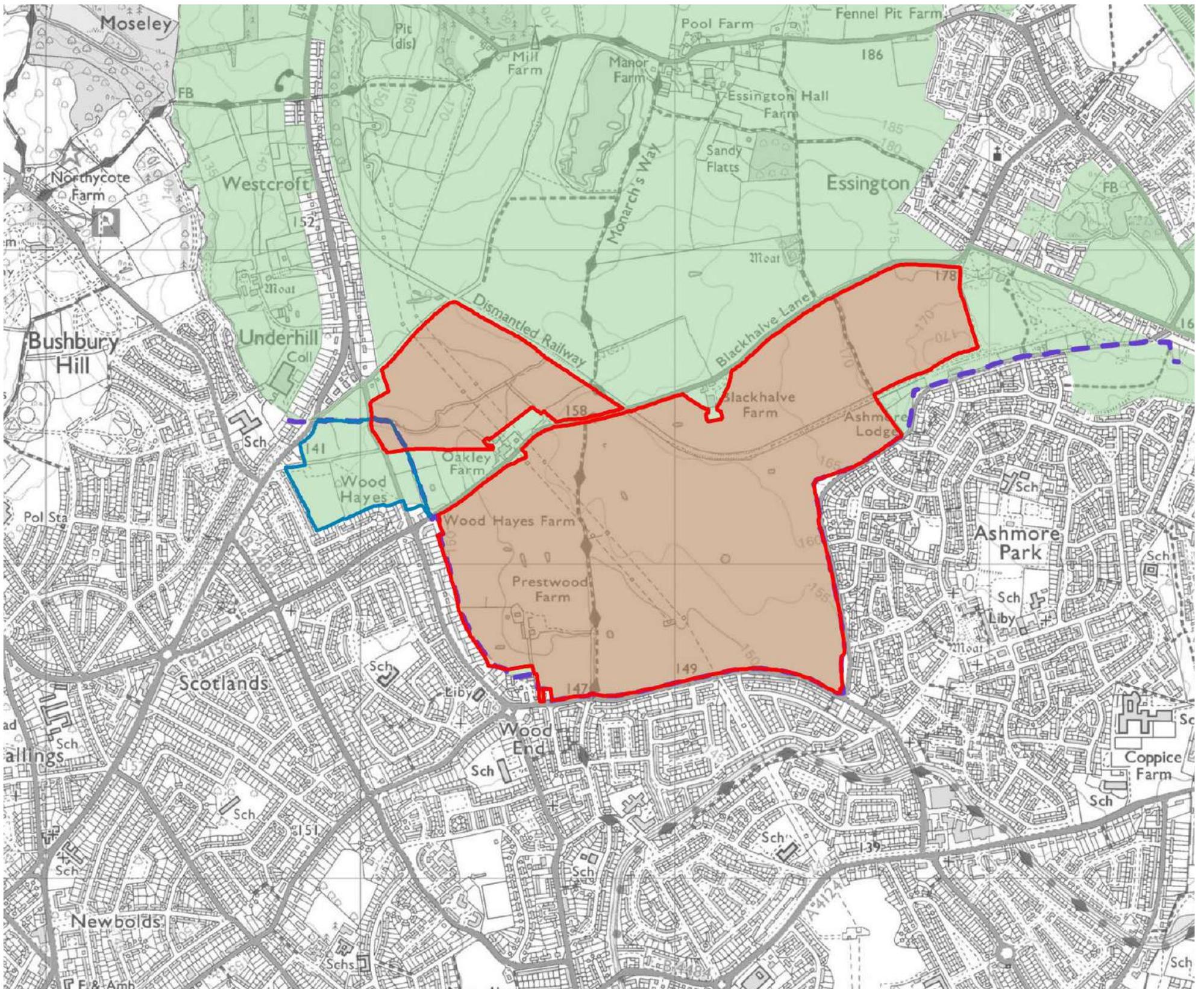
A Strategic Green Belt Review has been undertaken to inform the South Staffordshire Local Plan Review, as well as the Black Country Core Strategy Review.

The Green Belt Review assesses land parcels against the purposes of the Green Belt identified within the NPPF. The Green Belt Characteristics of Land at Linthouse Lane are discussed at Chapter 4 of this document.

4

Is there a need for Green Belt development?

4



KEY

- Taylor Wimpey Controlled Land
356.83 Acres/144.40 Hectares
- Draft Black Country Plan
Strategic Allocation CSA.2
- Local planning
authority boundary
- Green belt



**FIGURE 6:
GREEN BELT PLAN**

4. Is there a need for Green Belt development?

The Council has commissioned a Green Belt Assessment, alongside the City of Wolverhampton, Dudley, Sandwell and Walsall, (together comprising the Black Country authorities). The Study forms an important piece of evidence for the partial review of the Black Country Core Strategy (the Black Country Plan) and the strategic site allocations and individual development plans of the Black Country Authorities, as well as South Staffordshire District.

The Green Belt Study has two stages; the first is to assess 'strategic variations' between the contribution of land to the five purposes of the Green Belt, whilst the second includes a more focused assessment of the potential 'harm' of removing land from the Green Belt. Alongside the Green Belt Study, a Stage 3 assessment involved undertaking a landscape sensitivity assessment in order to assess the sensitivity of land within the South Staffordshire to housing and employment development. Whilst

there is a relationship between landscape sensitivity and Green Belt contribution/harm in that physical elements which play a role in determining landscape character, there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land. As such, the findings of the Stage 3 landscape sensitivity assessment for South Staffordshire and the Black Country are presented in a separate document (Landscape Study 2019) and is considered later in this Vision Document.

Contributions to Green Belt Purposes

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

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

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.

Once established, Green Belts should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans (NPPF paragraph 140). This Vision Document considers the contribution that land within the site makes to the purposes and function of the Green Belt, with reference to the Council's Green Belt Study. Recommendations are also included for the release of land for development that does not harm the Green Belt and offers options for new boundaries and the enhancement of retained Green Belt land.

The Council's Green Belt Study shows Land at Linthouse Lane, Wolverhampton, as falling within Green Belt Sub-Parcel Ref S20F – 'Ashmore Park/Essington' – which is identified as making the following contribution to the five purposes of the Green Belt:

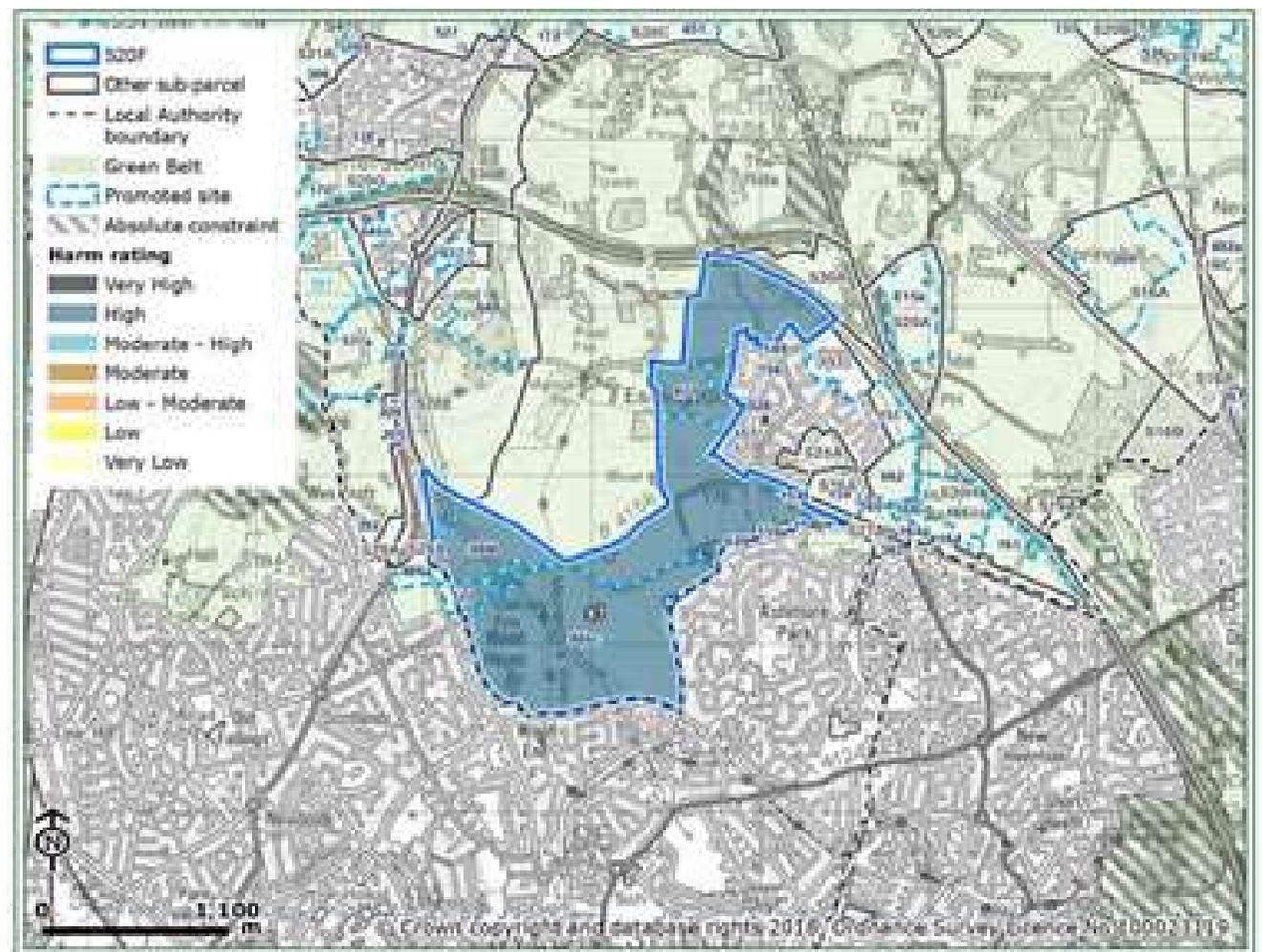
GB PURPOSE	ASSESSMENT	RATING
P1: Checking the unrestricted sprawl of large built-up areas	Land is adjacent or close to the large built-up area, contains no or very limited urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside.	Strong
P2: Preventing 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 (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	Strong
P4: Preserve the setting and special character of historic towns	Land does not contribute to the setting or special character of a historic town.	Weak / No contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong

Green Belt Purposes Summary: Parcel S20F - Ashmore Park/Essington

The Study goes on to identify that, should Green Belt Sub-Parcel Ref S20F be released for development, the resulting harm would be 'high', stating:

“The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation at Wednesfield, a moderate contribution to maintaining the separation between the neighbouring towns of Wednesfield and Great Wyrley, and a strong contribution to preventing encroachment on the countryside. The sub-parcel is adjacent to the settlement edge of the suburbs of Wednesfield to the east, south and west, however it retains a strong relationship with the open countryside to the north. Some of the land lies in the gap between these suburbs and the inset village of Essington, however the gap between the two has already essentially been breached by the housing development along High Hill Road. The existing Green belt boundaries at Wednesfield and Essington are not strongly defined, however given that there are no obvious stronger alternatives, releasing land here would serve to weaken the integrity of Green Belt land.”

Whilst the conclusions of the above assessment are noted, it remains that Green Belt Sub-Parcel ref: S20F extends significantly beyond Land at Linthouse Lane, which itself serves a reduced function against the five purposes of the Green Belt, as assessed below.



To Check the Unrestricted Sprawl of Large Built-Up Areas

The site is bounded on three of its four sides by residential properties, which form part of the Black Country conurbation (eastern, western and southern boundaries). To the north, the site is bounded in part by Blackhalve Lane, a dismantled railway line and further existing residential properties. These features present an opportunity to further strengthen this boundary, through the provision of open space and landscaping features.

The site would therefore be well contained and not encourage sprawl beyond the period of the Local Plan Review.

Accordingly, the release of the site from the Green Belt will not result in the unrestricted sprawl of Wolverhampton or the Black Country conurbation; it will instead serve to 'round-off' the conurbation's northern boundary.

To Prevent Neighbouring Towns from Merging into One Another

The nearest settlement to the site is the village of Essington, which is some 100 metres from the north-eastern red-line boundary. However, Essington shares a functional relationship with the Black Country conurbation, which it is connected to via High Hill/ Kitchen Lane/Upper Sneyd Road. Nevertheless, Essington is surrounded by Green Belt, which disconnects the village from Sneyd Road.

The next nearest settlement is the village of Featherstone, approximately 2.5km to the north-west of the site off junction 1 off the M54. Featherstone is separated from the site via the Green Belt, in conjunction with the physical boundary of the M54 motorway.

Hilton Main Industrial Estate and Hilton Cross Business Park are located to the south of junction 1 of the M54, approximately 1.5km to the north of the site. These are both surrounded by Green Belt.

The proposed Indicative Masterplan demonstrates how it is possible for the site to be developed without reducing the existing separation distance between the nearest neighbouring settlements (Essington and Hilton Industrial Estate/Business Park) and the existing Black Country conurbation. Due to the 'recessed' shape of the existing built form, it is possible for development to sit 'within' the prevailing development envelope of the conurbation, to the south of Blackhalve Lane and the dismantled railway.

Therefore, the release of this site will not result in the merging of any neighbouring towns, as a significant Green Belt gap will remain.

To Assist in Safeguarding the Countryside from Encroachment

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 Indicative Masterplan.

The release of this site from the Green Belt will not compromise the purpose of safeguarding the countryside from encroachment.

To Preserve the Setting and Special Character of Historic Towns

Whilst Wolverhampton is a historic canal City which contains 31 conservation areas and associated listed buildings, these are not located within close proximity of the site and, as such, the site does not make a significant contribution to fulfilling this purpose of the Green Belt.

Several listed buildings exist to the south and west of the site, within the Wolverhampton urban area. These predominantly comprise Grade II Listed Buildings such as public houses, however, the Old Fallings Hall as part of Our Lady and St Chad Roman Catholic School is Grade II* Listed and is located approximately 1.6km to the west of the site.

Nevertheless, these buildings are well screened from the site due to the presence of urban built form in the separation distance. The site accordingly has a limited contribution towards the setting and special character of historic towns.

As such, the release of this site from the Green Belt will not compromise the setting or special character of any historic towns.

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

The release of this land from the Green Belt would not prevent the recycling of derelict and other urban land. The adopted Core Strategy allocates a significant amount of brownfield land for redevelopment. However, the supply of suitable brownfield land is now reducing. Therefore, a Green Belt review is to be undertaken as part of the Local Plan Review, in order to meet housing needs. The development of the site can be appropriately phased within the housing trajectory to take account of the availability and deliverability of brownfield sites across the District.

The release of the site from the Green Belt will therefore not prejudice the recycling of derelict and other urban land.

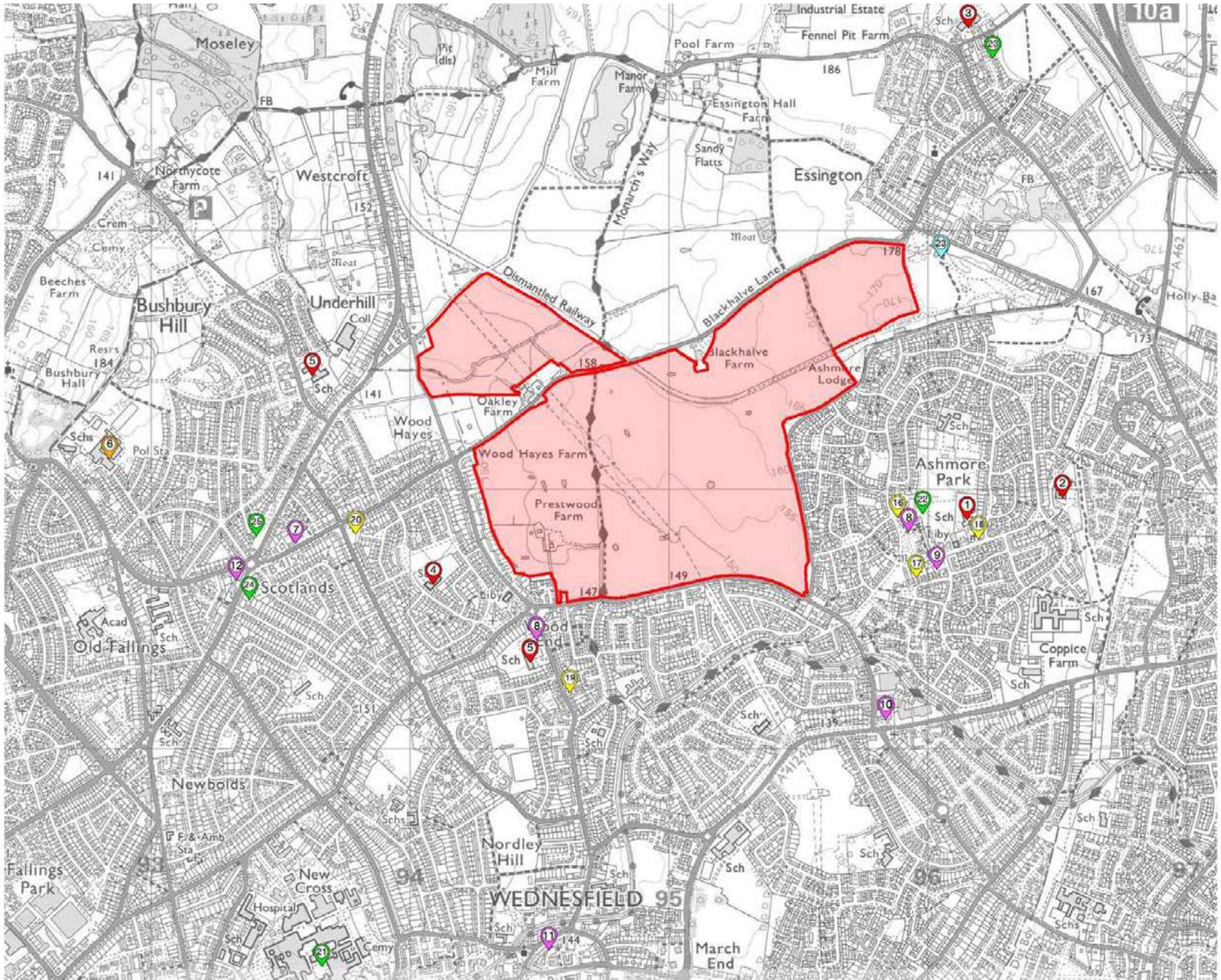
Summary of Green Belt Purposes

Overall, it is therefore considered that Land at Linthouse Lane makes a reduced contribution to the five purposes of the Green Belt than that identified within the Green Belt for Green Belt Sub-Parcel ref: S20F.

5

Is the site sustainable?

5



 Taylor Wimpey Controlled Land
356.83 Acres/144.40 Hectares

Primary Schools

-  1 Corpus Christi Primary Academy
-  2 St Albans C of E Primary School
-  3 St John's Primary Academy
-  4 Long Knowle Primary School
-  5 Berrybrook Primary School

Secondary Schools

-  6 Moreton School

Supermarkets/Post Office

-  7 LIDL Supermarket
-  8 NISA Local Post Office
-  9 Co-op Supermarket
-  10 Tesco Express Supermarket
-  11 Wednesfield Post Office
-  12 The Scotlands Post Office

Churches

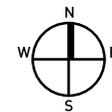
-  16 Ashmore Park Free Church
-  17 St Albans C of E Church
-  18 Corpus Christi Catholic Church
-  19 Wednesfield Methodist Church
-  20 St Gregory's C of E Church

Medical

-  21 New Cross Hospital
-  22 Ashmore Park Health Centre
-  23 Essington Medical Centre
-  24 Cannock Road Dental Practice
-  24 Kents Grove Surgery

Leisure

-  23 Essington Rugby Club



**FIGURE 7:
ACCESSIBILITY TO
LOCAL FACILITIES
PLAN**

5. Is the site sustainable?

Is the site in a sustainable location?

Wolverhampton is identified as a Strategic Centre in the Black Country Core Strategy, along with Brierley Hill, Walsall and West Bromwich. As such, Wolverhampton is a sustainable location for development. Wolverhampton benefits from an extensive range of services and facilities as would be expected in a city of this size. The site itself is well-related to the city and has good access to services as well as to the city centre via a number of different routes.

The majority of City's services are located in the city centre and include supermarkets, shops, restaurants, pubs and number of recreation uses. However, there also exist a number of services within a 2km radius of the site, including doctors and dentists.

There are also a number of local convenience stores within the vicinity of the site, with the nearest supermarkets being located toward either Wolverhampton city centre to the south or Bloxwich to the east.

There are a number of primary schools within 1km of the site, including; Long Knowle Primary School, Wood End Primary School and Nursery, D'Eyncourt Primary School, Berrybrook Primary School and Corpus Catholic Primary School. Furthermore, Morteton Secondary School, Our Lady and St Chad Catholic Academy and Coppice Performing Arts School are located within 2km of the site, whilst Westcroft School caters for children of all ages with special educational needs.

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, with the potential to accommodate a number of further stops within the site itself. Overall, there is significant opportunity to travel by public transport to Wolverhampton and beyond.

As can be seen, the site is well related to the city and it is evident that the site is sustainably located.

Sustainability Benefits

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

Technical Assessments

Provided below is a summary of the results of the various technical assessments which have been undertaken to identify site opportunities and constraints to inform the development vision.

Highways and Transportation

Access to the site can be achieved from a number of locations, including from via Linthouse Lane to the south, Kitchen Lane to the east and Blackhalve Lane to the north, as shown on the Indicative Masterplan.

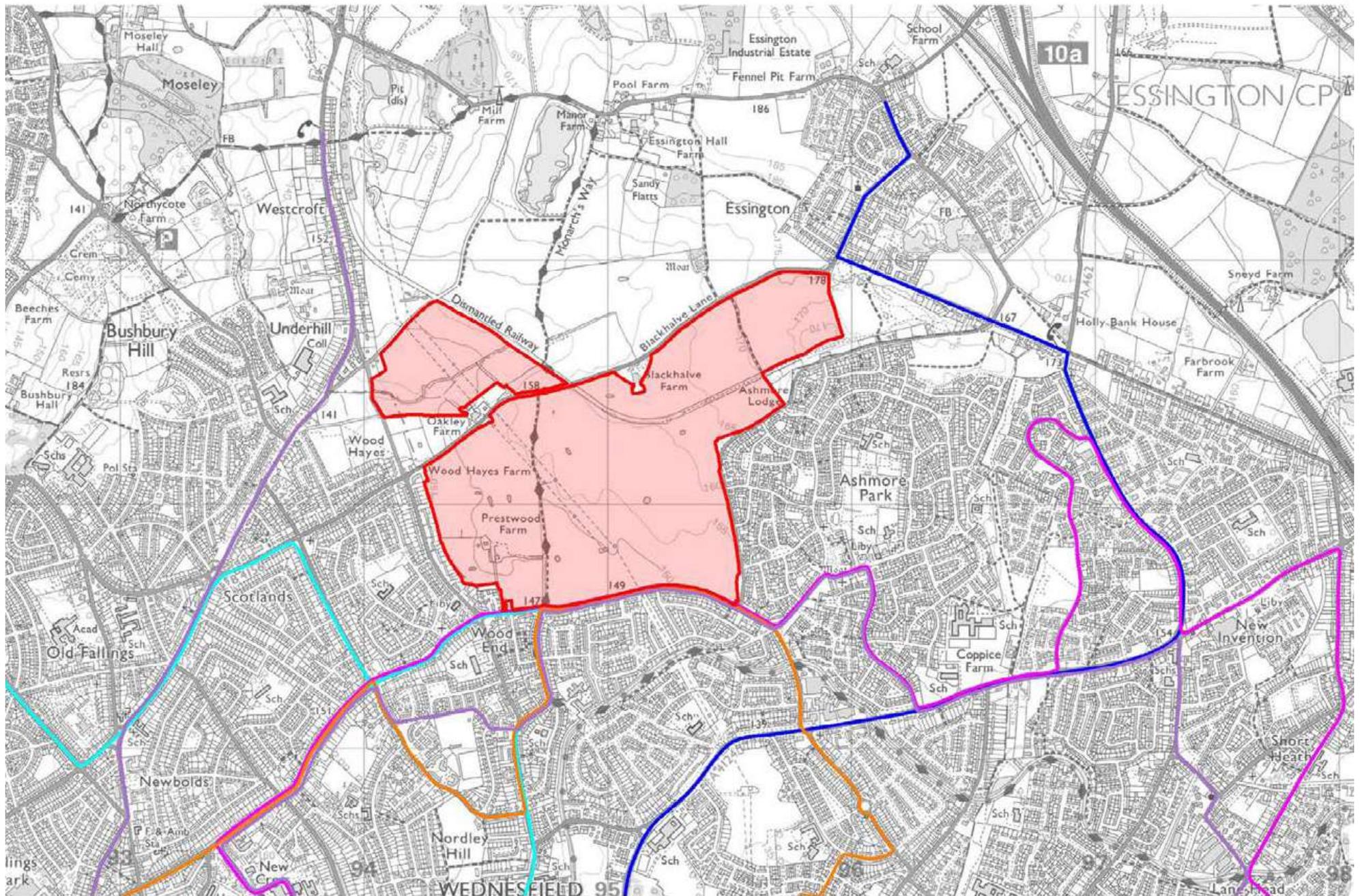
The existing highway network has good visibility in these locations and the required visibility splays could be achieved through minor highways works and widening.

Internally, the site would include a principal spine road in conjunction with a number of primary and secondary streets.

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, however, given the scale of the site, it is likely that a bus route will be diverted through the site to accommodate passengers.

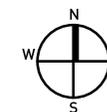
Various nearby facilities are considered to be within a reasonable walking distance from the site. The site is sustainable in terms of access by walking and cycling to local facilities and accessibility to public transport services.

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.



KEY

- | | | | |
|---|--|---|---|
|  | Taylor Wimpey Controlled Land
356.83 Acres/144.40 Hectares |  | Arriva Bus No.28E
Wolverhampton to New Invention |
|  | National Express West Midlands No.25
Pendeford to Wolverhampton |  | Arriva Bus No.57
Wolverhampton to Bilston |
|  | National Express West Midlands No.69
Wolverhampton to Walsall |  | Arriva Bus No.70
Cannock to Wolverhampton |
| | |  | Arriva Bus No.70A
Cannock to Wolverhampton |



**FIGURE 8:
LOCAL PUBLIC TRANSPORT
ACCESSIBILITY PLAN**

Flood Risk and Drainage

Based on the Environment Agency flood maps, the development site lies in Flood Zone 1 and therefore all land uses are sequentially acceptable.

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. Hydraulic modelling of existing water bodies will be undertaken as required however they are not considered to pose a significant risk to the development area.

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. The land naturally slopes to its southern boundary and it is anticipated the majority of this storage would be delivered through a series of attenuation basins and swales situated around the site and our assessment shows the total site is split into 3 catchment areas with different watercourse areas.

Attenuation to 1 in 100 year plus 40% for climate change will be provided and it is estimated storage in the region of 52,000m³ will be required. This figure will be refined in due course as further surveys are completed.

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.



Noise

Noise is unlikely to be a significant issue for the proposed development. The proposed Indicative 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.

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

Ground Conditions

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).

According to the Coal Authority database, the site is located in an area where a coal mining report is recommended. A review of the Coal Mining Report, the environmental data and the BGS Sheet for the area indicates that there is a potential risk from shallow coal mining. The highest risk is considered to be to the south east, where the Coal Measures strata outcrop and these decrease to the north west. If the seams are proven to have been worked, then a drill and grout scheme would be implemented to stabilise the overlying ground. The grouting scheme will be undertaken under a Coal Authority Permit and on completion of the grouting scheme; the risk is reduced to acceptable levels making these generally the same as the rest of the site in terms of risk.

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

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.

Diversions for sewers, water and gas mains, BT and electric cables will be required to facilitate the proposed access points and suitable payment will be made as required to facilitate these alterations.

The capacity of all of these utilities need to be determined. Suitable contributions will be made as part of the development to facilitate any improvement and reinforcement works required to serve the site. Any costs required to upgrade the network or provide suitable reinforcements will be met by the developer.



Landscape and Visual

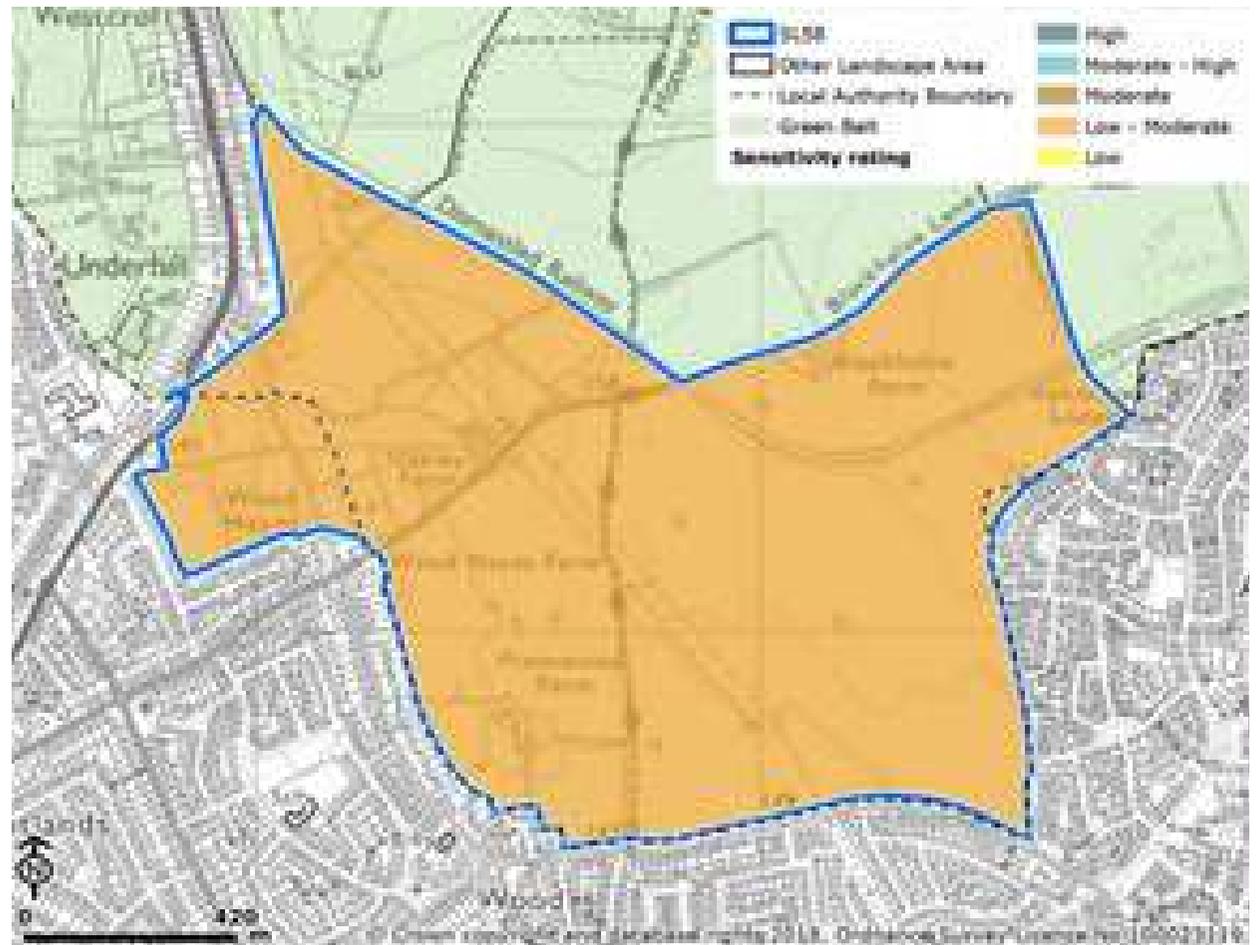
South Staffordshire District Council has produced a Landscape Study (2019) which forms part of the Local Plan Review evidence base. The site falls within the following Landscape Character Type: Settled Plateau Farmlands. The area is located north of Wednesfield, which forms the southern and eastern boundaries. The settlement edge of Underhill and Westcroft forms the western boundary, and the dismantled railway line and Blackhalve Lane the northern boundary. The Landscape Study concludes that the area has an overall low-moderate sensitivity to residential development, as although there is limited time depth and natural sensitivity, the area provides an open rural backdrop to the surrounding settlement edges.

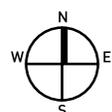
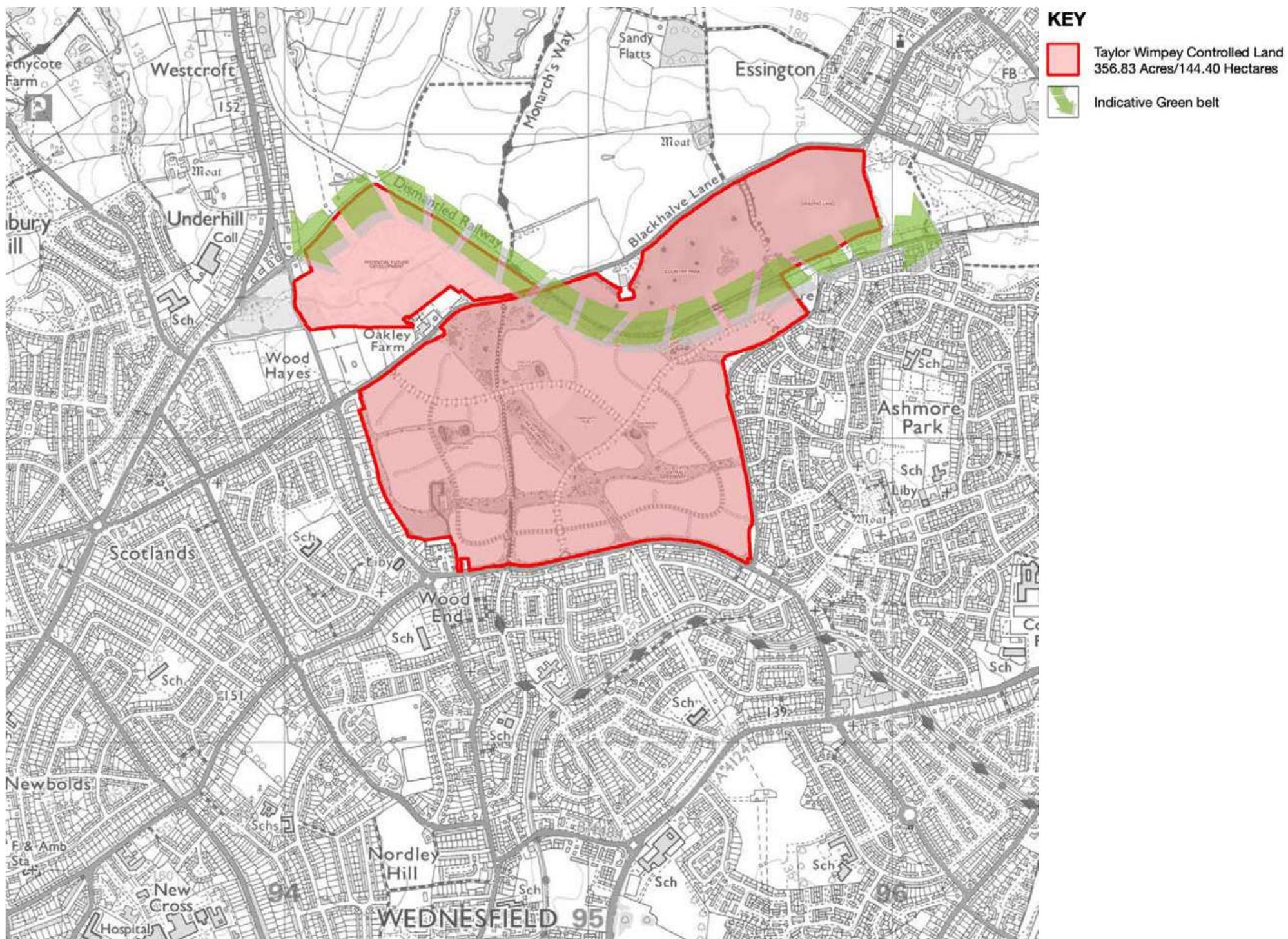
Agricultural Land Classification

Natural England's Land Classification Map for the West Midlands Region (ALC004) 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.

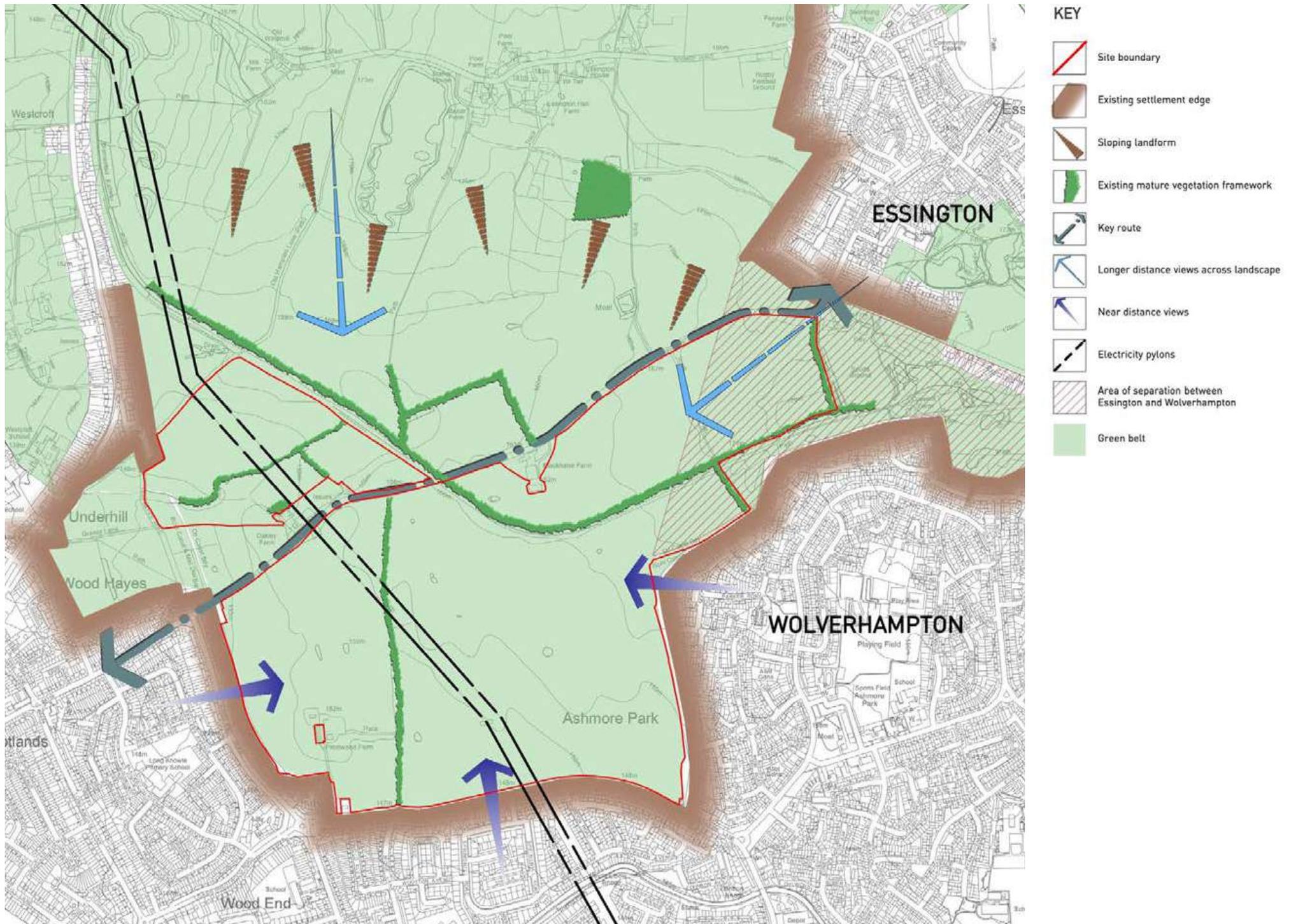
Further assessment will be required to ascertain the extent to which the site constitutes Grade 3a or 3b land.

Landscape Sensitivity Rating





**FIGURE 9:
INDICATIVE GREEN BELT EDGE**



**FIGURE 10:
PRELIMINARY LANDSCAPE ANALYSIS**

6

**What is the vision for
the site?**

6

6. What is the vision for the site?

Taylor Wimpey's vision for the site seeks to deliver the following objectives:

- **Deliver quality new homes** including both smaller and larger properties which make the best use of the land and contribute to meeting the needs of the city of Wolverhampton, South Staffordshire District and the Greater Birmingham Housing Market Area;
- **Achieve a choice of housing with a mix of housing** types, tenures and sizes to assist in meeting local housing needs;
- **Provide quality design** which will complement and enhance the existing character of the town and provide a high standard of living for both current and future residents;
- **Maintain and enhance connectivity and accessibility** with vehicular, cyclist and pedestrian links for the benefit of both current and future residents;

- **Provision of Public Open Space** a significant portion of the site will become public open space with enhanced pedestrian access to the on-site public open space. The provision of green space in the northern portion of the site also helps manage the transition from built development to countryside in a sensitive manner and creates a buffer to rest of the Green Belt;
- **Maintain and enhance site characteristics** including the retention of existing vegetation on site, as well as providing further planting to enhance the existing provision;
- **Achieve sustainable development** through the use of good urban design and landscaping principles and the inclusion of on-site sustainable drainage systems (SuDS); and
- **Creation of an attractive and safe development** where people want to live.

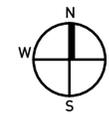
Approach

Taylor Wimpey has developed a Preliminary Indicative Masterplan which reflects the opportunities and constraints of the site and seeks to deliver the vision set out above. It is envisaged that this Masterplan will evolve further as a result of future consultations with South Staffordshire District Council, the local community and other key stakeholders.

Site Opportunities and Constraints

- A site which lies adjacent to the city of Wolverhampton and is accessible via a number of potential connections, including via Linthouse Lane, Kitchen Lane and Blackhalve Lane. This will result in a development which is well-related and integrated with the residential development in the area.
- The site is relatively flat with the topography rising gently towards the northern boundary. The existing northern boundary treatments present opportunities for boundary planting to further reinforce the defensible boundary to the north.
- The site is located in Flood Zone 1 and so is at the lowest flood risk. Nevertheless, a comprehensive sustainable drainage system would be provided on site and integrated with existing drainage systems.
- Respecting the local character by identifying examples of excellent existing development which can be used to inform the design of the site.
- The opportunity to enhance connectivity of the site, particularly for pedestrians and cyclists to the public open space.
- The need to respect residential amenity of existing development on fringes of Wolverhampton.

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 the city and provide a soft transition to the surrounding countryside.



**FIGURE 11:
SITE ANALYSIS PLAN**

KEY

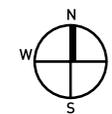
	SITE BOUNDARY 356.83 ACRES / 144.40 HECTARES		FIELD PATTERNS		DISMANTLED RAILWAY WALK		OVER HEAD CABLES 20M OFFSET NO BUILD ZONE (INDICATIVE)		PRIMARY ROAD
	DRAFT BLACK COUNTRY PLAN STRATEGIC HOUSING ALLOCATION CSA.2		DITCH (INDICATIVE POSITION)		VIEWS TOWARDS SITE FROM EXISTING BUILDINGS		UNDERGROUND CABLE		PUMPING STATION
	WIDER LANDSCAPE CONTEXT		ESTIMATED FLOOD ZONE FROM SURFACE WATER (INDICATIVE)		KEY VIEWS INTO THE SITE		SCHEDULED MONUMENT		SLOPED LANDFORM
	EXISTING VEGETATION (INDICATIVE)		LAKES, CANALS AND PONDS		STREET VIEWS INTO THE SITE		LOCAL FACILITIES (SHOPS, DOCTORS SURGERY, SCHOOL AND RECREATION)		AREA SUBJECT TO SHALLOW MINE WORKINGS (INDICATIVE)
	WOODLAND/PARKLAND		PUBLIC RIGHTS OF WAY		OVER HEAD CABLES		BUS STOP		

THIS DRAWING IS INDICATIVE AND SUBJECT TO DETAILED DESIGN AND SURVEY



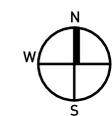
Framework and Conceptual Layout

The Development Framework for the site is shown opposite and demonstrates the basic structure to deliver the vision and objectives of a planned quality residential development on the urban edge. Based on this Development Framework an Indicative Masterplan has been prepared for the site.



**FIGURE 12:
FRAMEWORK AND
CONCEPTUAL
LAYOUT**





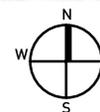
**FIGURE 13:
ILLUSTRATIVE
MASTERPLAN**

Layout

The internal layout includes a number of parcels of residential development, along with land in the centre of the site for a new two-form entry primary school. The layout also includes areas of public open space situated throughout the site, managing the transition between built form and open space within the site boundaries. The inclusion of on-site public open space to the north of the site provides a soft boundary with surrounding countryside and aids the creation of a strong and defensible Green Belt boundary.

The layout identifies the existing public right of way to the centre of the site would be integrated with the development, providing pedestrian and cycle access to the wider area.

An easement is included within the centre of the site to accommodate the existing power lines.



**FIGURE 14:
ACCESS AND MOVEMENT PLAN**

Access

There are several points of access identified on the Masterplan, including from via Linthouse Lane to the south, Kitchen Lane to the east and Blackhalve Lane to the north.

The existing highway network has good visibility in these locations and the required visibility splays could be achieved through minor highways works and widening.

A public right of way through the centre of the site would be enhanced via improvements to the connection with Linthouse Lane to the south and to Blackhalve Lane to the north.

This multi-connection approach minimises disturbance to the existing residential development to the west of the site and directs all vehicular traffic from the development directly on to the town's major routes. Within the site would be a number of primary streets with smaller secondary streets to access specific parts of the development.



Primary Street

The primary route 1 will aim to provide a clear and legible movement through the site lining access points from Linthouse Lane to Kitchen Lane and also a spur that will link to Blackhalves Lane. The make-up of the road will consist of a 6.5m wide carriageway with two 2m green planted verges and two pedestrian movement paths incorporating cycle movement to one side.

A sense of distinctiveness and legibility will be achieved with the use of distinctive buildings and green spaces. Although the primary route is not a character area itself it will travel through all five-character areas. Following its movement through the site subtle changes will occur in the use of alternative materials, styles, massing and build line will help to orientate the user to which character area they are in.

Massing will change through each character area but will generally range between 2-3 storey dwellings including the use of apartments at key locations.

Green infrastructure will follow the road through the entirety of the site. Green planted verges will help to provide a sense of place to users and help to indicate the primary status of the movement corridor. Dwellings will have a consistent setback to provide a further green space to fronts of properties helping to further emphasize green infrastructure.

Massing and block arrangements will consist of semi-detached and detached dwellings with the use of 3 storey apartment blocks at key focal stops or corners.

Parking will be situated to the side of properties helping to keep the street free of parked cars and assisting with unobstructed movement. Garages will ideally be set back behind buildline to help reduce the visual prominence of parked vehicles.



Secondary Street

Secondary routes will take direct access from either Primary route 1 or Primary route 2 providing links into the individual residential parcels.

Secondary routes will serve a smaller numbers of units, which the street makeup and massing should reflect. The highway will consist of a 5.5m carriageway with two 2m paths each side. Higher levels of variation in the buildline and scale of buildings coupled with larger front gardens will help in assisting the user with legibility through the site.

A variety of parking typologies will be prevalent helping to create an informal residential development with the potential for on-street parking bays helping to reduce road speeds and increase levels of safety.





Tertiary Lane

Tertiary Routes will run along the extremities of the development parcels. Although they can feature along greenways and parkland settings.

These streets and lanes are defined by the green spaces and will help to reduce the impact of development on green spaces and help to bring greenways through the site assisting in green movement.

These roads are 4.8-5m wide carriageways with one 2m wide path to run along the development side with a shared surface approach to vehicular and pedestrian movement.

Building massing and enclosure will be reduced to help development sit appropriately in its green rural surroundings. Higher levels of variation in rooflines and angulation will further assist in reducing the impact of development on green spaces.

A variety of parking typologies will be predominant helping to create the opportunities for extra landscaping between dwellings and parking.





Private Lane

Private lanes will feature throughout the site in a variety of locations providing access to a limited number of dwellings.

Private lanes and Shared spaces can be located in a range of settings from green edges, inner shared surface courtyards, greenway edges and parkland edges.

Typically, the private lanes and shared surfaces will 4.5m shared surface spaces provided directly off secondary streets and will be maintained by the private residents.

Variation in the buildline, orientation of dwellings and rooflines will assist in creating a homezone type arrangement and help users to identify these as a private space.





Character Areas

Four broad indicative character areas are identified within the masterplan, which are explored in detail overleaf.

KEY

- DRAFT BLACK COUNTRY PLAN STRATEGIC ALLOCATION CSA.2
- CHARACTER AREA 1 - LINTHOUSE LANE/ KITCHEN LANE INTERFACE
- CHARACTER AREA 2 - DEVELOPMENT CORE
- CHARACTER AREA 3 - CENTRAL GREENWAY
- CHARACTER AREA 4 - RURAL GREEN EDGE
- CHARACTER AREA 5 - COMMUNITY HUB

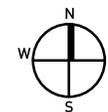


FIGURE 15:
CHARACTER AREAS PLAN

CHARACTER AREA 1 - LINTHOUSE LANE/KITCHEN LANE INTERFACE

Linthouse Lane/Kitchen Lane Interface

This character area will seek to blend with its surrounding urban context of Linthouse Lane and Kitchen Lane. With a strong urban form and linear design, the proposed development will complement the existing development.

The use of linear low-level planting and regular planting of larger native trees. This will aim to complement the existing movement corridors with a blend of existing and proposed ornamental planting.

Key corners and key junctures will feature angled circus style units much like the surrounding junctures of Linthouse Lane/ Wood End Rd and Linthouse Lane/ Griffiths Drive.

Key features will include:

- Increased massing onto key interfaces to help frame the existing movement routes.
- A more rigid approach to dwelling type e.g. semi-detached and terrace units.
- Use of corner turners at every junction.
- More regular use of standard rooflines with turned units being used at key focal stops and corners only.
- A varied use of storey heights ranging from 1.5 - 2.5 storey dwellings.
- A strong implementation of green planting to front gardens and linear green spaces with a key aim to retain all existing vegetation.
- Strong enclosure to all units through a varied use of natural and built boundaries.
- Parking typologies will be limited to side parking and minimal use of frontal parking to mid-run terrace units.



CHARACTER AREA 2 - DEVELOPMENT CORE

Development Core

This character area will contain the largest numbers of dwellings when compared with the other five character areas and will feature across a large area of the site. The development core will be the backbone of the site with strong use of increased massing and legibility at key movement routes.

Planting will be varied across the character area; this will depend on its location to key movement routes and proximity to key green spaces e.g. Prestwood Green.

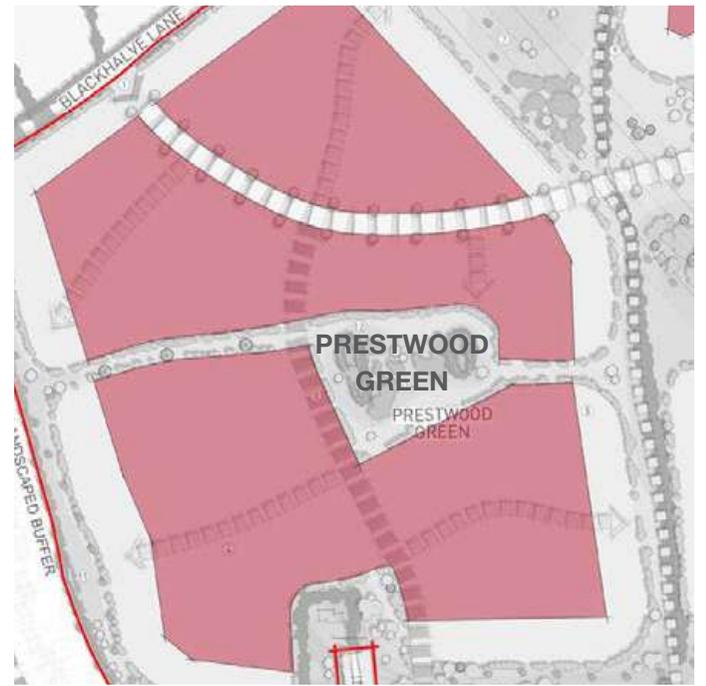
A diverse use of dwelling types and sizes will feature to create an eclectic array of rooflines, storey heights, buildlines and parking typologies.

Key features will include:

- A wide-ranging use of massings and rooflines with strong variation occurring at key focal stops, junctures and corners.
- The use of a range of different dwelling types will feature use of maisonettes, apartments, semi-detached, terrace and detached dwellings.
- Strong enclosure to dwellings to assist in demarcating private from public areas.
- A range of storey heights ranging from 1-3 storey dwellings.
- Parking typologies will feature a range of parking types from frontal parking, side parking, on plot parking, courtyard parking and on street parking.
- Clear and concise pedestrian movement routes allowing the character area to act as a conduit between existing and proposed green spaces.
- Use of corner turners at every junction.
- Retention of existing ponds and incorporated into a feature parkland setting called "Prestwood Green"



SKETCH VISUALISATION OF PRESTWOOD GREEN



CHARACTER AREA 3 - CENTRAL GREENWAY

Central Greenway

The central Greenway is characterised by its strong wetland features and large greenway running East to West. The sites natural low point is located along the Central Greenway and will feature the majority of the sites overall sustainable Urban Drainage. This space presents an opportunity to create an enriched wildlife corridor with increase in habitat for wildlife and diversity.

All development with a direct interface with Central Greenway will be frontward facing and will help to frame the enhanced landscaped led Greenway.

A diverse range of building heights, building massings and rooflines will help to create an eclectic and wide-ranging built development to what will be an enhanced landscaped Greenway.

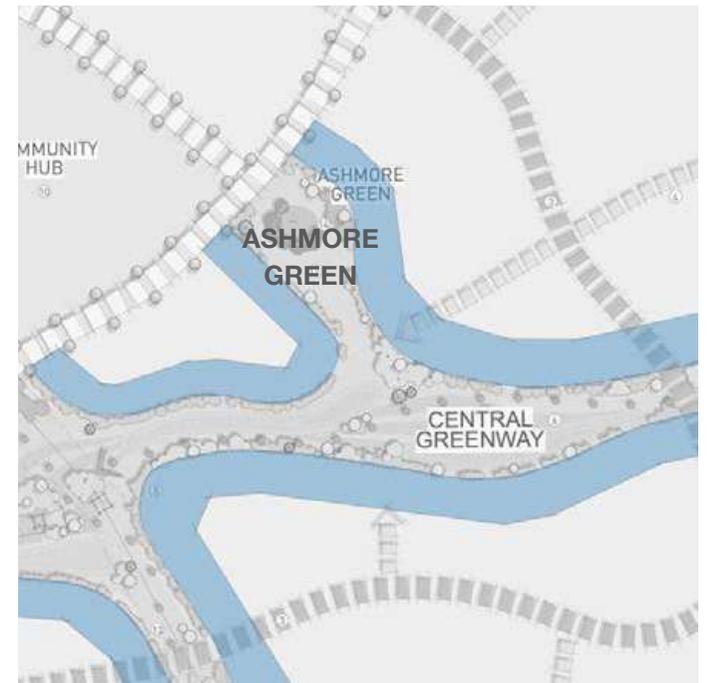
Key features will include:

- Varied use of roof scapes and units uncentred to the highway to create an informal built edge to the green edge.
- Softer/ natural use of building materials to help compliment the wetland ecology space.
- A more consistent use of building types with semi-detached and detached units featuring predominantly.
- Strong sense of enclosure to private spaces through a varied use of knee-high railing to natural box hedgerows.
- Use of corner turners at every junction.
- Parking typologies will be limited to side parking and on-plot driveway parking with all parking being appropriately broken up with landscaping.



SKETCH VISUALISATION OF ASHMORE GREEN

- Delivery of a low-medium density development with a varying use of widths and depths.
- Meandering pedestrian movement routes assisting with pedestrian movement through the site and out to the wider context.
- Retention of existing ponds and incorporated into a feature parkland setting called “Ashmore Green”



CHARACTER AREA 4 - RURAL GREEN EDGE

Rural Green Edge

This character area is the last element of development before the site transitions out to the rural countryside context. This area will demonstrate the most varying and dynamic transition in design characteristics and will encompass a lower density character.

Lower storey heights will provide an opportunity to create an appropriate development edge to the rural countryside.

Increased levels of on plot and public open space landscaping will soften the development and help to create a new Green Belt boundary.

Key features will include:

- Retention of existing ponds and incorporated into a feature parkland setting called “Oakley Green”
- Lower density development with a greater massing and density around Oakley Green.
- Varied rooflines and irregular buildlines/patterns to help development blend out to the rural countryside.

- Low levels of enclosure to units overlooking green spaces through the use natural green boundaries.
- Use of corner turners at every junction and key focal stop.
- Parking typologies will be limited to side parking and on plot driveway parking.
- Key pedestrian connections on to the Linear Greenway and Northern Greenway with the Dismantled railway becoming a key north-East connection to Essington and Westcroft.
- Softer/ natural use of building materials to help compliment the rural green edge setting.



SKETCH VISUALISATION OF OAKLEY GREEN



CHARACTER AREA 5 - COMMUNITY HUB

Character Area 5

The community hub will become the key central space for all proposed residents. With its central location and close proximity to key pedestrian movement routes, access for all residents will be short and commutable by foot.

The Community hub will feature a key village square on the key junction of the primary route 1 and Ashmore Green. A key transition will occur between the urban square to the informal parkland setting and beyond to the wetland ecology of Central Greenway.

The Community Hub has the potential to include:

- A primary school for new residents.
- Community Hall
- Doctors Surgery.
- Convenience Store.
- Café
- Playing spaces.

Indicative visualisations of the Community Hub are shown on pages 61-62. More detailed design of these buildings and spaces will be presented as part of an outline application.



SKETCH VISUALISATION OF THE COMMUNITY HUB



CHARACTER AREA 5 - COMMUNITY HUB



INDICATIVE VISUALISATIONS OF THE COMMUNITY HUB AND SCHOOL

Potential Primary School

Potential Community Hub to include a doctors surgery, cafe and hall

Potential community space

Potential Foodstore



Potential Primary School

Potential Community Hub to include a doctors surgery, cafe and hall



Scale and Design

The Indicative Masterplan indicates the development could accommodate c. 2100-2450 dwellings on 60.81 ha of net developable land. This gives an overall density of approximately 35-40 dwellings per hectare.

The layout also includes a substantial area of land for use as public open space and SuDS.



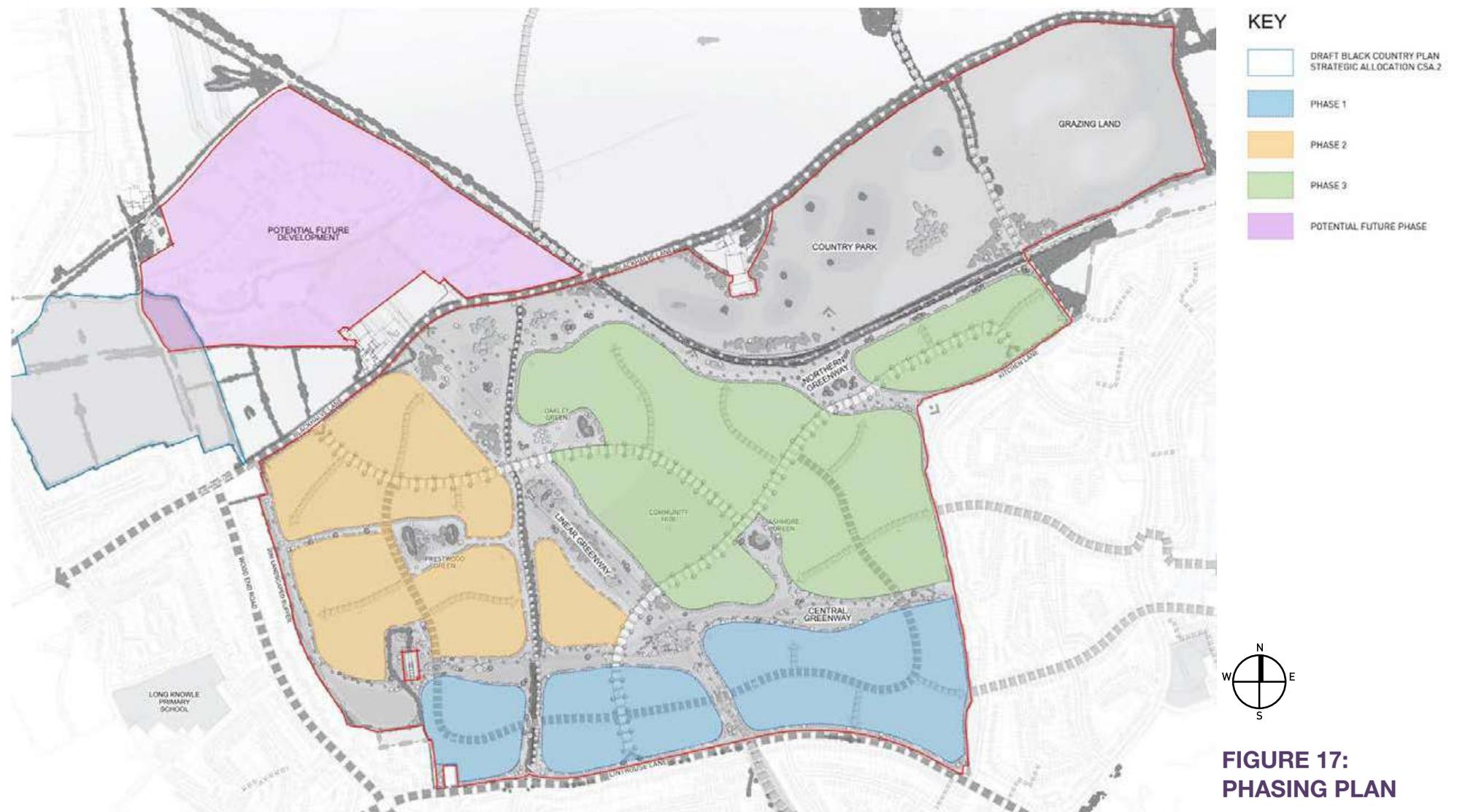
Phasing

It is anticipated that the three residential development zones shown will be brought forward in residential phases. In addition, land to the north of Blackhalve Lane is identified as a potential future phase.

Given the sites scale and proximity to existing development, it is likely that any development would be brought forward in a number of build stages. Denoted above is an indicative phasing plan which demonstrates how this may be realised.

It is envisaged that the land immediately north of Linthouse Lane will comprise phase 1; land lining up with Blackhalve Lane will form phase 2; and land running parallel with Kitchen Lane and the dismantled railway will form phase 3.

Land accommodating the Community Hub to the centre of the site will come forward when the local demand/ population requires the formation of the community hub.



Landscape, Greenspace and Drainage

A significant amount of the site will be utilised as Public Open Space. This will include any retained vegetation throughout the site, in conjunction with landscaping and sustainable drainage in the form of swales and ponds as part of the open space proposals.

The inclusion of pedestrian linkages will contribute towards the permeability of the site. The landscaping scheme will be designed to effectively differentiate between public and private areas and enhance the biodiversity status of the site with appropriate local species.



FIGURE 18:
GREEN INFRASTRUCTURE



Linear Greenway

The Linear Greenway runs North to south and incorporates a wide range of various open space typologies. Each will be serving a purpose and function based on its location and setting. These will include:

- Sustainable Urban Drainage
- Retention of existing public right of way
- Providing a pedestrian movement route from Linthouse Lane to Blackhalves Lane.
- Enhanced buffer planting to minimise the visual impacts of service infrastructure
- Retention of existing hedgerows
- Provision of a foraging route for wildlife on site.

The Linear Greenway will run parallel with the existing electricity pylons running through the site. Development edges have been designed to be meandering in form and aiming not to frame the electricity pylons, though the development will not try to hide the pylons will seek to minimise the view with glimpse views through development and appropriate levels of landscaping.

The Linear Greenway provides a fitting response to its urban forms and will respond positively to create a landscaped opportunity with permeated with pedestrian movement routes.

Development will have full surveillance over the greenway and will be of a lower density defined by tertiary and private lanes to reflect the setting of the open space.

Central Greenway

The central Greenway runs east to west and picks up on the site's low points and utilises them for the creation of sustainable urban drainage.

The aim is to create a wetland ecology corridor with use of wet and dry drainage ponds each landscaped appropriately to support wetland habitats and wildlife.

Key features will include:

- Utilisation of site low points for sustainable urban drainage.

- Creating a key green space at the juncture with the Linear Greenway and providing pedestrians with full permeability north, East, South and west through the site.
- Retention and enhancement of existing hedgerows and ponds.
- Pedestrian movement routes will meander through the greenway and connect up with the existing public right of way and Kitchen Lane.

Development fronting on to the Central Greenway will be all outward facing with high levels of surveillance over public open spaces. The level of density around this space will be kept low to reflect its natural green led position within the site.

Housing styles will be varied with a range of rooflines and angles to the buildline. Tertiary lanes and private drives will frame the space and help to blend the development visually with the Greenway.



Northern Greenway

The Northern Greenway will be the conduit between several important spaces. It will assist in blending the rural edge development with the rural countryside; provide an interface between the development and the existing dismantled railway walkway and also provide pedestrian movement from the development to the proposed country park.

Key features will include:

- Retention of existing vegetation along the dismantled railway providing an appropriate green buffer from development to the rural edge.

- Transitional space between built development and the countryside edge.
- Key pedestrian movement corridor between Kitchen Lane and Blackhalve Lane.
- Retention of existing ponds with a 20m offset for wildlife foraging routes.
- Enhanced planting to create an informal green movement.
- Key views retained from Kitchen Lane to the wider contextual countryside.

Development fronting the space will be fully outward facing with a distinct rural character. Lower density and larger units will help to reduce the massing on the green edge and help to assimilate the development with the newly proposed green belt boundary.

All movement routes will be of a lower hierarchy and will feature predominantly as tertiary lanes and private drives to assist in reducing the impact of development on green spaces.



7

Conclusion

7



7. Conclusion

The land off Linthouse Lane is truly deliverable and should be allocated for residential development through South Staffordshire's Local Plan Review process. The site provides the opportunity to realise a sustainable, quality urban extension on the northern edge of Wolverhampton which could accommodate c. 2,100-2,450 new homes as well as significant amounts of public open space.

Available Now

The land identified on the land control plan (Figure 4) is under the control of Taylor Wimpey, a national housebuilder who are committed to delivering a sustainable residential community on the site at the earliest opportunity following an appropriate allocation as part of the South Staffordshire Local Plan Review.

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

Suitable Location

The site comprises Green Belt land on the edge of Wolverhampton which, as demonstrated in Section 4, it is a suitable candidate for release to meet housing needs of the city of Wolverhampton, South Staffordshire District and the Greater Birmingham Housing Market Area. Whilst the site is currently located within the Green Belt, Wolverhampton has a wide range of services and facilities located in its existing built area. The city also provides excellent links to other cities throughout the country. The site is considered to be a sustainable location for residential development.

Achievable

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 have the capacity to deliver the proposed development.

In terms of a delivery programme, if the site were allocated in the Local Plan Review then the first completions could potentially occur as early as 2024, whilst the whole development would be completed in accordance with the housing delivery trajectory set out within the Local Plan Review.

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

Taylor Wimpey is committed to working with South Staffordshire District Council, the Black Country Authorities and the local community to design a quality residential development which respects and enhances the village. We 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.



Appendices

Appendix 1

Taylor Wimpey UK Limited



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 Social Landlords as well as a variety of Government bodies such as the Homes and Communities Agency.

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 as part of this is Taylor Wimpey North West based in Warrington.



Taylor
Wimpey