

SOUTH STAFFORDSHIRE LOCAL PLAN PREFERRED OPTIONS NOVEMBER 2021

LAND AT BOSCOMOOR LANE, PENKRIDGE

**REPRESENTATION PREPARED ON BEHALF OF
RICHBOROUGH ESTATES**



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



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APPENDICES:

Appendix 1: Site Location Plan

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1.0 Introduction

1.1 This representation is made by Pegasus Group on behalf of Richborough Estates 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 Boscomoor Lane, Penkridge, which Richborough Estates is promoting for residential development.

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
- Preferred Options Housing Site Selection Topic Paper (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 Richborough Estates 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 Richborough Estates 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
Preferred Options Housing Site Selection Topic Paper (South Staffordshire Council) 2021	Chapter 8
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 Richborough Estates supports SSDC's proposed infrastructure-led strategy which seeks to focus development towards larger settlements supplemented with some smaller settlement sites and, where appropriate, deliver new infrastructure benefits.

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

- Improvements to sports and leisure facilities within the District.
- 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. Richborough Estates is committed to engaging with the District Council, 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 Boscomoor Lane.

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 Richborough Estates has no comment to make in respect of Policy DS2.

Housing

- 3.4 Richborough Estates 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 In respect of residential development, Richborough Estates 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 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

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.

produced by the Standard Method represents a minimum figure, rather than 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 has been subject to consultation in 2021, and 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 Richborough Estates, although SSDC should continue to co-operate with other authorities within the GBBCHMA 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.

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

This may require an uplift in local housing needs identified.

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 Richborough Estates does not support the limiting of new allocations at Perton to only the land safeguarded through the adopted SAD. Further comment on this matter is provided within a further Representation relevant to Perton, prepared by Pegasus Group on behalf of Richborough Estates.
- 3.24 Furthermore, whilst Featherstone is identified as a Tier 3 Settlement within the Settlement Hierarchy, it is located less than a mile away from the strategic mixed-use allocation at Cross Green (ref:646a and 646b). It is submitted that Featherstone can play a similar role in supporting the existing and planned employment opportunities in the area, whilst also supporting the creation of additional services and facilities, to the betterment of the overall sustainability of the settlement. Further comment on this matter is provided within a further Representation relevant to Featherstone, prepared by Pegasus Group on behalf of Richborough Estates.

Longer Term Growth Aspirations for a New Settlement

- 3.25 Policy DS4 sets out an aspiration for SSDC to deliver a new settlement beyond the plan period. A broad location comprising the transport corridor formed by the A449 and West Coast Mainline between Wolverhampton and Stafford has been identified as a potential area of search for such proposals.

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 Richborough Estates supports Policy DS4 and recognises the importance and suitability of the identified potential growth corridor, as first suggested by the SGS. Richborough Estates also supports the objectives for the new settlement as set out within the Policy.
- 3.27 To this end, Richborough Estates is promoting Land North of the A5, Gailey, which falls within this corridor. A separate representation has been prepared by Pegasus Group on behalf of Richborough Estates which further promotes this land for allocation in a future Local Plan.

4.0 Site Allocations

Strategic Masterplanning Locations

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

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 Richborough Estates has no specific comments to make in respect of the Strategic Allocations SA1-SA4.

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.

4.3 Richborough Estates supports the allocation of their land interests identified through Policy SA5 – Land adjacent to 44 Station Road, Codsall (ref:224), Land off Marston Road/ Fenton House Lane (ref: 610), and Land North of Langley Road (adjoining City of Wolverhampton boundary) (ref: 582).

4.4 However, Richborough Estates believes that Land at Boscomoor Lane, Penkridge, should also be included within Policy SA5 and allocated for

development through the LPR, the justification for which is set out within Chapter 7 of this Representation.

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 Much can change over the 17 years of the Plan. 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 requirement for 30% affordable housing appears to be broadly supported

by the Viability Study⁵ 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. However, the LPR and evidence base should justify why social rent is the preferred rented tenure, rather than affordable rent.

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 Richborough Estates 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 ‘peppercot’ 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:

⁵ Viability Assessment – Local Plan and Community Infrastructure Levy (Dixon Searle Partnership) October 2021.

"...make a clear contribution to meeting the needs of the district's 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. This clarification is particularly important now that affordable compact domestic lifts are increasingly becoming an alternative to ground floor accommodation. New builds can be designed so that these can be fitted to a property when required.

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 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. Whilst Richborough generally support the concept of self-build/custom housing, they do not consider providing them as part of a larger housing development is the most appropriate solution because self/custom builders are more likely to want a more bespoke location/setting. Smaller dedicated self/custom sites are therefore a more appropriate answer.
- 5.25 However, if there is a policy requiring self/custom build on major sites then it is nevertheless submitted that it 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 a set period of

time and have not sold, plots can be used for delivery of general market housing.

Policy HC9 – Design Requirements

- 5.26 Richborough Estates 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

- 5.1 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.
- 5.2 The requirement that all dwellings should meet Nationally Described Space Standards is not supported without being fully evidenced. 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.”*

5.3 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.

5.4 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

5.5 The continuity of existing parking standards is supported. The inclusion of EV charging standards is also supported and provides helpful clarity.

Policy HC14 - Health Infrastructure

- 5.6 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

- 5.7 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

- 5.8 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.
- 5.9 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.

- 5.10 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

- 5.11 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.
- 5.12 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

- 5.13 The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential dwellings is not supported. Whilst the benefits of such plans are acknowledged, it is considered more appropriate to implement them on a site-by-site basis, dependent on local circumstances and the labour market. This is especially important in the context of modular methods of construction inevitably increasing in the coming years, probably sourced from outside South Staffordshire.

Policy EC9 – Infrastructure

- 5.14 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

- 5.15 Policy EC10 confirms that specific infrastructure requirements will be identified in relevant policy areas and site proformas.
- 5.16 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

- 5.17 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

- 5.18 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

- 5.19 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.
- 5.20 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.

6.0 Sustainability Appraisal

6.1 The LPR Consultation is supported by a Sustainability Appraisal, prepared by Lepus Consulting⁶ ('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

⁶ 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.
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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 at Boscomoor Lane – Site Ref: 006

6.5 Land at Boscomoor Lane is assessed within the SA as 'Land at Boscomoor Lane' - Site reference: 006. 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
006	+/-	-	-	-	-	-	+	-	-	-	-	-

Figure 6.1: Significance of effects pre-mitigation, Site Ref: 006

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
006	+/-	+	+/-	-	0	-	+	-	0	-	-	-

Figure 6.2: Significance of effects post-mitigation, Site Ref: 006

-
- 6.6 Richborough Estates supports the findings of the SA in respect of the site.
- 6.7 However, despite the positive findings of the SA, the site has not been identified as an allocation within the LPR. This is discussed further in Chapter 7 of this Representation.

7.0 Land at Boscomoor Lane, Penkridge

Site Description

- 7.1 Richborough Estates is currently in control of land off Boscomoor Lane, Penkridge which is promoted for residential development, as shown on the Site Location Plan appended to this representation (see **Appendix 1**).
- 7.2 The site comprises approximately 3.8ha of land of land, adjoining the southern edge of the urban area of Penkridge, immediately south of Wolgarston Way and to south of the Staffordshire and Worcestershire Canal. Land to the west of the site is currently undergoing redevelopment from an industrial estate to residential development. The site is visually contained, enclosed by development on all three sides, and includes an area of agricultural land.

Proposed Development

- 7.3 A Vision Document has been prepared in support of the promotion of this site and is included at **Appendix 2** to this representation. This Vision Document contains an indicative masterplan which identifies the following key features:
- Delivery of approximately 90 dwellings, provided at a net density of approximately 37 dwellings per hectare;
 - The provision of new Public Open Space with potential for the delivery of a children's play facility, providing a range of habitats including wet and wildflower meadow;
 - Green corridors provided throughout the development, encompassing existing hedgerows & field boundaries where possible. The corridors provide for pedestrian permeability within the development;

- Development set back and fronting on to the Staffordshire and Worcestershire Canal to provide a sympathetic frontage to the Conservation Area.
- Incorporation of SuDS using balancing ponds indicated on the low points of the development along Boscomoor Lane (subject to detailed assessment).
- Strengthened planting to southern boundary to create strong and enduring Green Belt boundary.

7.4 Further information in respect of the promotion of this site can be found within the supporting Vision Document.

Green Belt

7.5 South Staffordshire District 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.

7.6 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. As such, the findings of the Stage 3 landscape sensitivity assessment for South Staffordshire and the Black Country are presented in a separate document (Landscape Study 2019) and is considered later in this representation.

Green Belt Purposes

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

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

Contributions to Green Belt Purposes

7.8 The Green Belt Study shows Land at Boscomoor Lane, Penkridge, as falling within Green Belt Sub-Parcel Ref S32F - 'West and South of Penkridge', 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 sufficiently separated or distant from a large built-up area for there to be no significant potential for urban sprawl from the large built up area	Weak / No contribution
P2: Preventing the	Land plays no significant role due to the	Weak / No

merging of neighbouring towns	distance between the West Midlands conurbation and Stafford, and between Stafford and Cannock.	contribution
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

Table 7.1: Land Parcel S32F Contribution Towards Green Belt Purposes

7.9 The Study goes on to identify that, should Green Belt Sub-Parcel ref: S32Fs3 (within which land at Boscomoor Lane falls) be released for development, the resulting harm would be 'low-moderate', stating:

"The sub-parcel makes a strong contribution to preventing encroachment on the countryside. This part of the sub-parcel is tightly contained by the existing inset settlement of Penkridge and contains some intruding urbanising elements. Release of this land would therefore simplify the Green Belt; creating a shorter boundary that is consistent with the boundary of the existing inset area of Penkridge."

Harm Ratings Overview Map of Land within Sub-Parcel

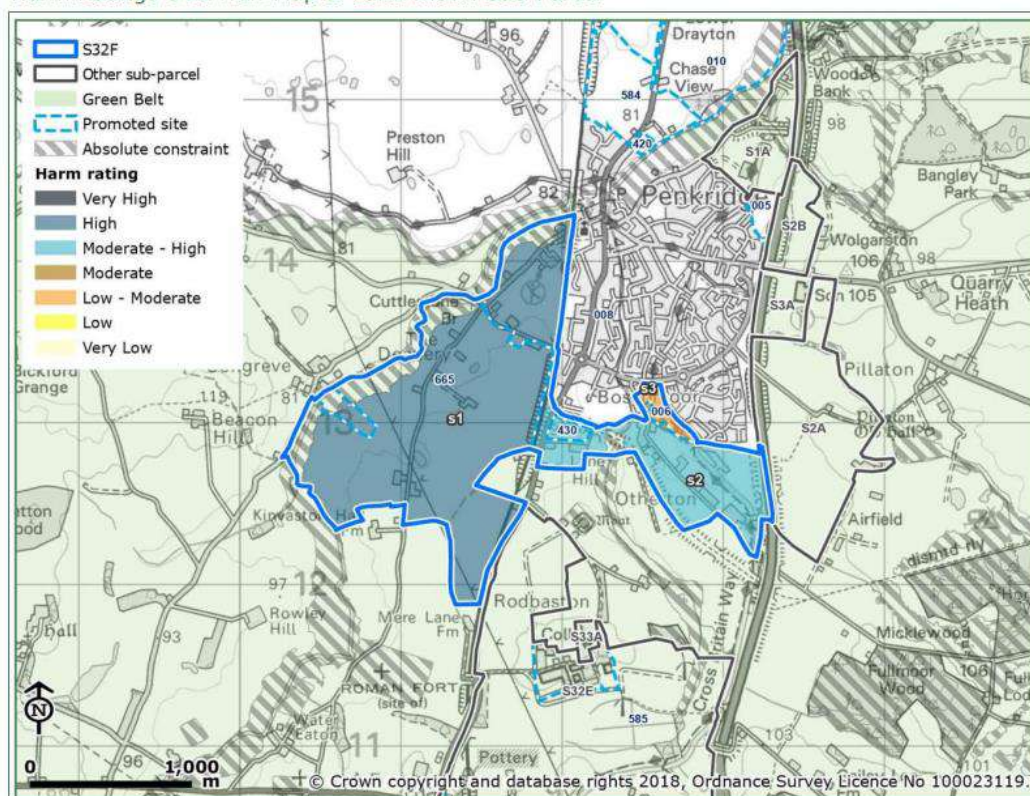


Figure 7.1: Harm Ratings for Land Parcel S32F

7.10 Richborough Estates supports the conclusions of the above assessment. Additional site-specific commentary regarding Land at Boscomoor Lane is provided below, in order to assist with the on-going consideration of the site.

To Check the Unrestricted Sprawl of Large Built-Up Areas

7.11 The site is situated between an under-construction development to the west and adjacent to the existing residential edge of Penkridge to the north and east. Boundaries are formed by the footpath Penkridge 19(a) to the south, the Canal to the east, Boscomoor Lane to the west and Wolgarston Way to the north.

7.12 As such, the site does not contribute to preventing the unrestricted sprawl of Penkridge, being contained by existing development and robust, permanent boundaries. As identified within the Council’s Green Belt Study, the release of

the site would simplify the Green Belt; creating a shorter boundary that is consistent with the boundary of the existing inset area of Penkridge.

- 7.13 The site therefore makes a weak/no contribution to this purpose of the Green Belt.

To Prevent Neighbouring Towns from Merging into One Another

- 7.14 In contrast with the Council's Review for the larger Parcel 2, the site is contained within the extents of the existing development at Penkridge, including the under-construction development to the west and development bounding the site to the south along Boscomoor Lane.

- 7.15 As set out above, the site is located within the confines of the existing built area of Penkridge. The development of the site will 'round off' the settlement edge and therefore the built form extents to the south of Penkridge will remain. The development of the site will therefore not contribute towards the merging of neighbouring towns and accordingly makes no contribution to this purpose of the Green Belt.

To Assist in Safeguarding the Countryside from Encroachment

- 7.16 Whilst the site contains some characteristics of open countryside, such as an absence of built development, it remains that the site is surrounded on three sides by the built envelope of Penkridge.
- 7.17 The short southern section of the site adjacent to footpath Penkridge 19(a) has an urban edge character, with a mature hedgerow and hedgerow trees separating the grassland of the site to the fields to the south. If retained and enhanced with additional trees and the strengthening of the existing hedgerow, this could form a recognisable and permanent new Green Belt boundary. This would further strengthen the landscape structure and the physical and visual boundaries to the site at the interface with the wider landscape and Green Belt to the south.

- 7.18 It is therefore considered that the site makes a 'moderate' contribution to assisting in safeguarding the countryside from encroachment, rather than the 'strong' contribution identified within the Green Belt Study.

To Preserve the Setting and Special Character of Historic Towns

- 7.19 As identified within the Council's Green Belt Study, Penkridge is not a historic town and, as such, the removal of the site from the Green Belt would not conflict with this purpose of the Green Belt. Richborough Estates therefore agrees with the conclusions of the Green Belt Study, that the site makes a 'weak/no' contribution to preserving the setting and special character of historic towns.

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

- 7.20 Whilst it is acknowledged that all Green Belt land make a contribution towards encouraging the recycling of derelict and other urban land, the site and immediate area does not contain significant areas of brownfield land and would therefore not prejudice the redevelopment of urban land in this area. The release of the site from the Green Belt and allocation for residential development would therefore not significantly prevent the recycling of derelict land and other urban land.
- 7.21 It is therefore considered that the site makes a 'moderate' contribution to this purpose of the Green Belt, rather than the 'strong' contribution identified within the Green Belt Study.

Summary of Green Belt Purposes

- 7.22 Overall, it is therefore considered that Land at Boscomoor Lane, Penkridge, 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: S32Fs3. This contribution is summarised in the table below:

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

Table 7.2: Land at Boscomoor Lane, Green Belt Assessment

Green Belt Harm

- 7.23 Richborough Estates agrees with the conclusion of the Green Belt Study in respect of Green Belt Harm, in that, should the site be released for development, the resulting harm would be 'low-moderate'.
- 7.24 As identified previously, the site is tightly contained by the existing development and is inset within the existing built form of Penkridge. Release of this land would therefore simplify the Green Belt; creating a shorter boundary that is consistent with the boundary of the existing edge of Penkridge.
- 7.25 Richborough Estates agrees with the conclusion of the Green Belt Study in respect of Green Belt Harm, in that, should the site be released for development, the resulting harm would be 'low-moderate'.

Landscape Sensitivity

- 7.26 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 Types: Ancient Clay Farmlands (west) and

Settled Heathlands (east). The landscape area is situated immediately to the south of Penkridge. It is bounded by the A449 Stafford Road in the west, the M6 in the east and partly by a disused railway line in the south. The Study identifies that this is a small scale area which retains some sense of rural character, including some notable mature hedgerows and trees, but which is also influenced by its proximity to the urban fringe of Penkridge and the M6. Overall it is considered that the landscape sensitivity to residential development is moderate.

7.27 An extract of the Council’s Appraisal of Landscape Sensitivity is included below:

Characteristic / Attribute	Lower Sensitivity to Development	Moderate Sensitivity to Development	Higher Sensitivity to Development
Scale			Fields and land divisions are mostly small scale, with frequent human scale features such as farmsteads, other houses and cottages, trees and hedgerows.
Landform	The area is broadly flat, with elevation ranging from c.95m to c.87m AOD. A minor tributary of the River Penk flows northwards through the area, but this does not affect the flat landform.		
Landscape pattern and time depth		Post-1880s reorganised piecemeal enclosure east of Otherton Lane. Lyne Hill is identified as a pre-1880s settlement. There have been some hedgerow boundary losses through the area post-war, which has adversely affected its time depth.	Some areas of post-medieval piecemeal enclosure south and west of Otherton Lane, including isolated areas north of Lyne Hill Lane which retain irregular field boundaries and thick mature hedgerows and hedgerow trees.
'Natural' character		Limited areas of priority habitat deciduous woodland are identified along the disused railway corridor and the	

		M6. Elsewhere, valued natural features include further woodland along the railway corridor, which has an important role in habitat connectivity through the area and beyond, together with the remnant hedgerow network and areas of non-intensively managed pasture/grassland and scrub.	
Built character	There are some modern features present which impart an urban influence; notably a large new housing estate under construction north of Lyne Hill Lane.	The Staffordshire and Worcestershire canal is an historic feature running through the east of the area, and contributes to landscape character.	Otherton Farmhouse on Otherton Lane is a Grade II listed building.
Recreational character		There are some PROws crossing this area, as well as a traffic-free cycle route along the canal towpath.	
Perceptual aspects	The sense of tranquillity is limited by the area's proximity to the M6.	Otherton Lane passes through the centre of the area and retains a largely rural character, with some scenic views.	
Settlement setting		The area provides a backdrop/setting to the small hamlet of Lyne Hill, as well as the southern edge of Penkridge, which is characterised by modern housing, including a new housing estate under construction on a former industrial site north of Lyne Hill Lane.	
Visual prominence		Parts of the area have a degree of prominence from the edge of Penkridge and Lyne Hill, although the broadly flat landform and enclosure by frequent vegetation means that expansive views of the area are generally not possible from the wider	

		landscape beyond.	
Inter-visibility with adjacent designated landscapes or promoted view points	Little or no inter-visibility with adjacent designated landscapes or promoted viewpoints.		
Landscape Sensitivity Judgement (SL36 S1)	This is a small scale area which retains some sense of rural character, including some notable mature hedgerows and trees, but which is also influenced by its proximity to the urban fringe of Penkridge and the M6. Overall it is considered that the landscape sensitivity to residential development is moderate.		moderate

7.28 The Study concludes that Landscape Parcel SL36S1 (which encompasses land at Boscomoor Lane) is considered to have a 'moderate' overall sensitivity to residential development, as identified on Figure 7.2 below.

Landscape Sensitivity Rating

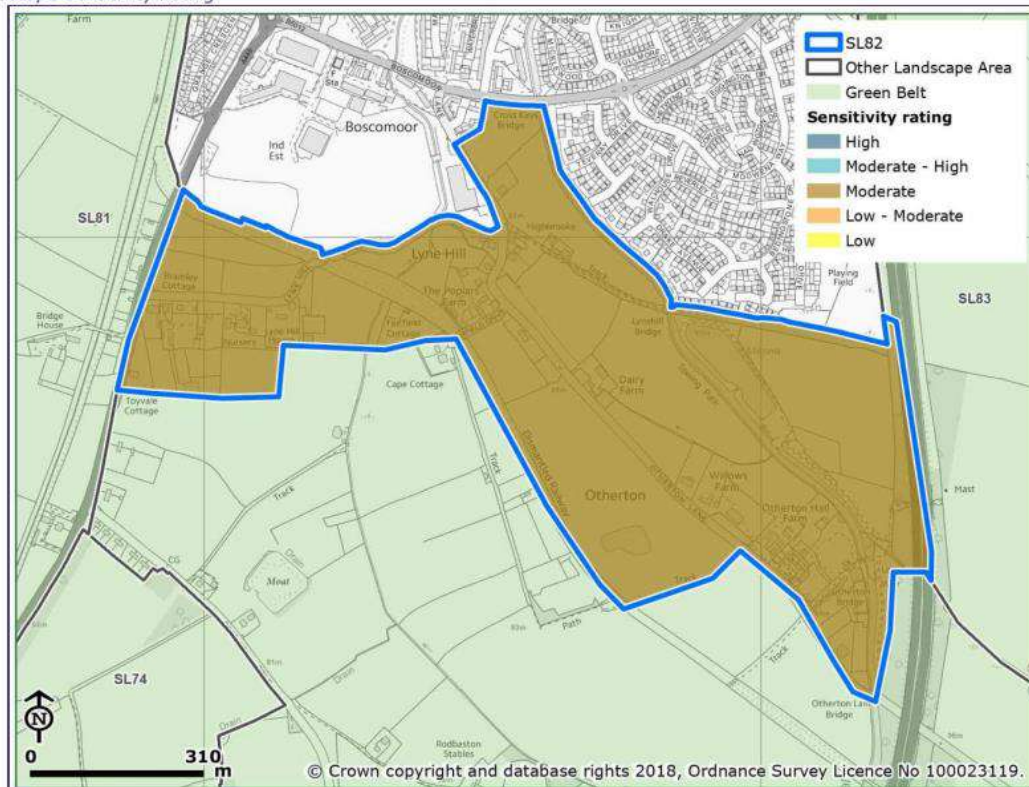


Figure 7.2: Landscape Sensitivity Rating Parcel SL36

- 7.29 The findings of the Landscape Study for the wider parcel are not necessarily disputed by Richborough Estates. However, it remains that land off Boscomoor Lane performs significantly better in landscape terms, principally due to the fact that the site is enveloped on three sides by the existing built form of Penkridge, thus reducing its landscape sensitivity when compared to the rest of the parcel.
- 7.30 The site comprises two irregular-shaped grassland fields separated by a typical gappy hedgerow. To the north, Wolgarston Way with associated residential properties overlooks the northern part of the site from a raised vantage point. A small number of properties to the south of Wolgarston Way influence the north western corner of the site.
- 7.31 To the east of the site lies a large number of existing residential properties beyond the Staffordshire and Worcestershire Canal with views across the site. The 'Cross Britain Way' runs along the Canal's western edge adjacent to the site. Development fronting the Canal should respect the character and locality with a set back to retain the good quality tree stock and hedgerow.
- 7.32 To the west, the under-construction development off Boscomoor Lane provides a further urban influence to the site. Public footpath 'Penkridge 19(a) with associated hedgerows and mature trees provide the boundary to the south of the site, separating it from the fields beyond whilst restricting inter-visibility.
- 7.33 The hedgerow field boundaries provide containment and structure and are also characteristic features within the local landscape. They should be retained and enhanced where possible to strengthen the visually-contained nature of the site.
- 7.34 The site is generally flat with no constraints topographically.
- 7.35 It is therefore considered that the sensitivity of the site should be reduced to '*low-moderate*'.

- 7.36 Again, Chapter 8 of this Representation sets out how South Staffordshire District Council's Landscape Study (2019) concludes that Landscape Parcel SL36S1 (which encompasses land at Boscomoor Lane) is considered to have a 'moderate' overall sensitivity to residential development.
- 7.37 Nevertheless, Richborough Estates remains of the view that land off Boscomoor Lane performs significantly better in landscape terms than Landscape Parcel SL36S1, principally due to the fact that the site is enveloped on three sides by the existing built form of Penkridge, thus reducing its landscape sensitivity when compared to the rest of the parcel.
- 7.38 To the north, Wolgarston Way with associated residential properties overlooks the northern part of the site from a raised vantage point. A small number of properties to the south of Wolgarston Way influence the north western corner of the site. To the east of the site lies a large number of existing residential properties beyond the Staffordshire and Worcestershire Canal with views across the site. To the west, the under-construction development off Boscomoor Lane will soon provide a further urban influence to the site. Public footpath 'Penkridge 19(a) with associated hedgerows and mature trees provide the boundary to the south of the site, separating it from the fields beyond whilst restricting inter-visibility.
- 7.39 The hedgerow field boundaries provide containment and structure and are also characteristic features within the local landscape. They should be retained and enhanced where possible to strengthen the visually-contained nature of the site.
- 7.40 It is therefore considered that the sensitivity of the site should be reduced to 'low-moderate'.
- 7.41 The Illustrative Masterplan contained within the accompanying Vision Document demonstrates how the site may come forward for development, in accordance with these landscape principles.

Sustainability and Site Selection

- 7.42 As set out in Chapter 6 of this Representation, the Council's Sustainability Appraisal scores the site favourably. The Housing Site Selection Topic Paper (2021) concludes that the Site has not been allocated principally because there are other non-Green Belt sites available to the north of Penkridge, irrespective of the sustainability of Land at Boscomoor Lane.
- 7.43 Richborough Estates, strongly refutes this argument. It is a matter of fact that SSDC has accepted the need for significant Green Belt release throughout the District to satisfy development needs within the Plan Period. It is therefore not understood how Green Belt release is acceptable at other lower-tier settlements, yet not at Penkridge, a settlement identified by the Rural services and Facilities Audit as being among the most sustainable in the District. It is accordingly identified within the LPR as a tier 1 settlement.
- 7.44 The allocation of Green Belt sites at lower order settlements ahead of a more sustainable tier 1 Green Belt sites puts Green Belt considerations ahead of the overall sustainability of the spatial strategy of the LPR, which is a significant failing of the strategy. SSDC's own evidence (the Sustainability Appraisal) recognises the sustainability of the site, identifying that it performs better against the identified sustainability objectives than a number of the allocations that are included within the Plan.
- 7.45 The site should therefore be allocated, in addition to those sites already identified.

Impact on the Historic Environment

- 7.46 RPS Heritage has undertaken an initial appraisal of the extent and nature of known built heritage assets within the site and surrounding area. The site is located immediately west of the Staffordshire and Worcestershire Conservation Area, which includes the canal and towpath. In addition, there are several canal bridges and locks located within this Conservation Area

which are recognised locally as non-designated heritage assets, the closest being Lyne Hill Bridge (No.83) which is located adjacent to the site's south-east corner.

7.47 Located approximately 0.5km south-west of the site is the Grade II listed Otherton Farmhouse, which has several associated historic outbuildings. As there is the potential for limited inter-visibility between the site and the farmstead, their significance may be affected by the development of the site.

7.48 The identified built heritage assets are not considered to be a constraint to the development of the site as future development will incorporate mitigation measures to minimise any impact on their significance. The level of harm to the Conservation Area and Listed Buildings would not exceed less than substantial and the impact on the non-designated heritage assets would be considered with regard to paragraph 197 of the NPPF. Any future planning application would be supported by a Built Heritage Statement which would assess the significance of the potentially affected designated and non-designated built heritage assets, and any impact on their respective significance from the development of the site.

Surface Water Flooding

7.49 According to the Environment Agency Flood Map for Planning, the application site is located entirely within Flood Zone 1 (Low Probability), which is land defined as having less than a 1 in 1000 annual probability of river or sea flooding. The nearest Environment Agency Main River is the unnamed tributary of the River Penk, which is located approximately 50m west of the site.

7.50 The Staffordshire and Worcestershire Canal runs along the eastern boundary of the site. Further investigation is needed to better define the level of risk posed to the development, however, due to the controlled and maintained nature of canals, it is not expected to pose a barrier to development.

- 7.51 A surface water and foul water sewer are present on the site, which will require a suitable easement. An alternative option could be to undertake a diversion of the sewers, both options would be subject to further consultation with STW at the appropriate juncture. The presence of the sewers on site is not thought to pose a significant flood risk to the development.
- 7.52 An appropriate Surface Water Management Strategy which complies with the latest local and national advice will be implemented on the site to attenuate the increase in surface water runoff caused by development. As a first option and in line with the drainage hierarchy, infiltration should be considered for the disposal of surface water due to the expected favourable ground conditions and Sandstone bedrock geology. In the event that infiltration is not viable, the rate at which the runoff is discharged into the surface water sewer on site will be restricted to the equivalent greenfield runoff rate, preventing an increase in flows leaving the site and thus ensuring that the development does not have a detrimental impact upon flood risk elsewhere.
- 7.53 Through the application of Sustainable Urban Drainage Systems (SuDS), the additional surface water will be stored within the site and subjected to multiple stages of treatment to guarantee that the water quality in the wider drainage network is protected. Wherever possible SuDS features will be above ground to enhance the aesthetic amenity of the development and provide valuable habitats for the local wildlife. The attenuation provided will be appropriately sized to include an allowance for climate change. Example SuDS features that will be incorporated into the development wherever possible include attenuation basins, permeable paving and swales.

Highways (Accessibility to the Site)

- 7.54 Vehicular access to the site is proposed directly off Boscomoor Lane along the western frontage of the site. The proposed access junction will take the form of a priority T-junction and is positioned approximately 80m south of Boscomoor Court and approximately 40m south of the existing junction on the western side of Boscomoor Lane which will provide access to a new

residential development which is under construction.

- 7.55 The proposed access road will be 5.5m wide with 2.0m wide footways on both sides of the carriageway. The access proposals include a footway which links the site access junction to the existing footway provision further north on the eastern side of Boscomoor Lane. In order to achieve a 2.0m wide footway link, Boscomoor Lane has been narrowed from approximately 6.3m to just over 5.5m in width.
- 7.56 Visibility splays to/from the proposed access junction are in line with guidance set out in Manual for Streets 2 (MfS2).
- 7.57 It is considered appropriate to provide pedestrian access alongside the proposed vehicular access. Footways 2.0m in width have been proposed on both sides of the carriageway.
- 7.58 A 2.0m wide footway will then be provided on the eastern side of Boscomoor Lane, which will provide a link to the existing footway provision further north which goes on to connect to existing footways along the B5012.

Suitability

- 7.59 The site represents a logical and sustainable extension to the sustainable Tier 1 settlement of Penkridge which provides the opportunity to deliver approximately 90 dwellings with associated supporting infrastructure.
- 7.60 The site is currently used as grazing land and is identified as part Grade 2/ part Grade 3 agricultural land on Natural England's high-level Agricultural Land Classification (ALC) Maps. The site is located in Flood Zone 1, the area at least risk of flooding. The site is flat and not constrained by topography.
- 7.61 There are no listed building within or adjacent to the site. The site lies adjacent to the Staffordshire and Worcestershire Canal Conservation Area but

lies outside of the Penkridge Conservation Area.

- 7.62 The site is sustainably located within close proximity to the local services and amenities in Penkridge. A number of local services exist in a local centre approximately 400m to the west of the site including: Co-operative food store, local convenience store, restaurant, takeaways and a petrol station. Within the village centre located approximately 1km to the north of the site and includes banks, convenience stores, supermarkets, post office, hairdressers and pubs. There are also a range of education establishments within Penkridge which include 1 middle school, 2 first schools and 1 high school.
- 7.63 The site is also well served with regards to public transport. The nearest bus stop is located on Wolgarston Way which provides a frequent service to the centre of Penkridge and Stafford as well as other higher order services outside of the village. Penkridge Train Station is located approximately 1km to the north of the site, providing regular services to Wolverhampton, Birmingham, Stafford and Liverpool.
- 7.64 The information set out above, read in conjunction with the appended illustrative masterplan, demonstrates that land off Boscomoor Lane, Penkridge is a suitable site.

Deliverability

- 7.65 There is an agreement in place between the landowner and Richborough Estates to facilitate the development of the site.
- 7.66 Richborough Estates intends to undertake further technical work to demonstrate the deliverability of land off Boscomoor Lane, however information gathered to date concludes that there are no physical or other constraints likely to render the site undeliverable within the proposed Plan period to 2037. This land represents a logical and sustainable extension to the existing Category 1 settlement of Penkridge and has the capacity to

deliver approximately 90 dwellings and supporting infrastructure. The site is available now.

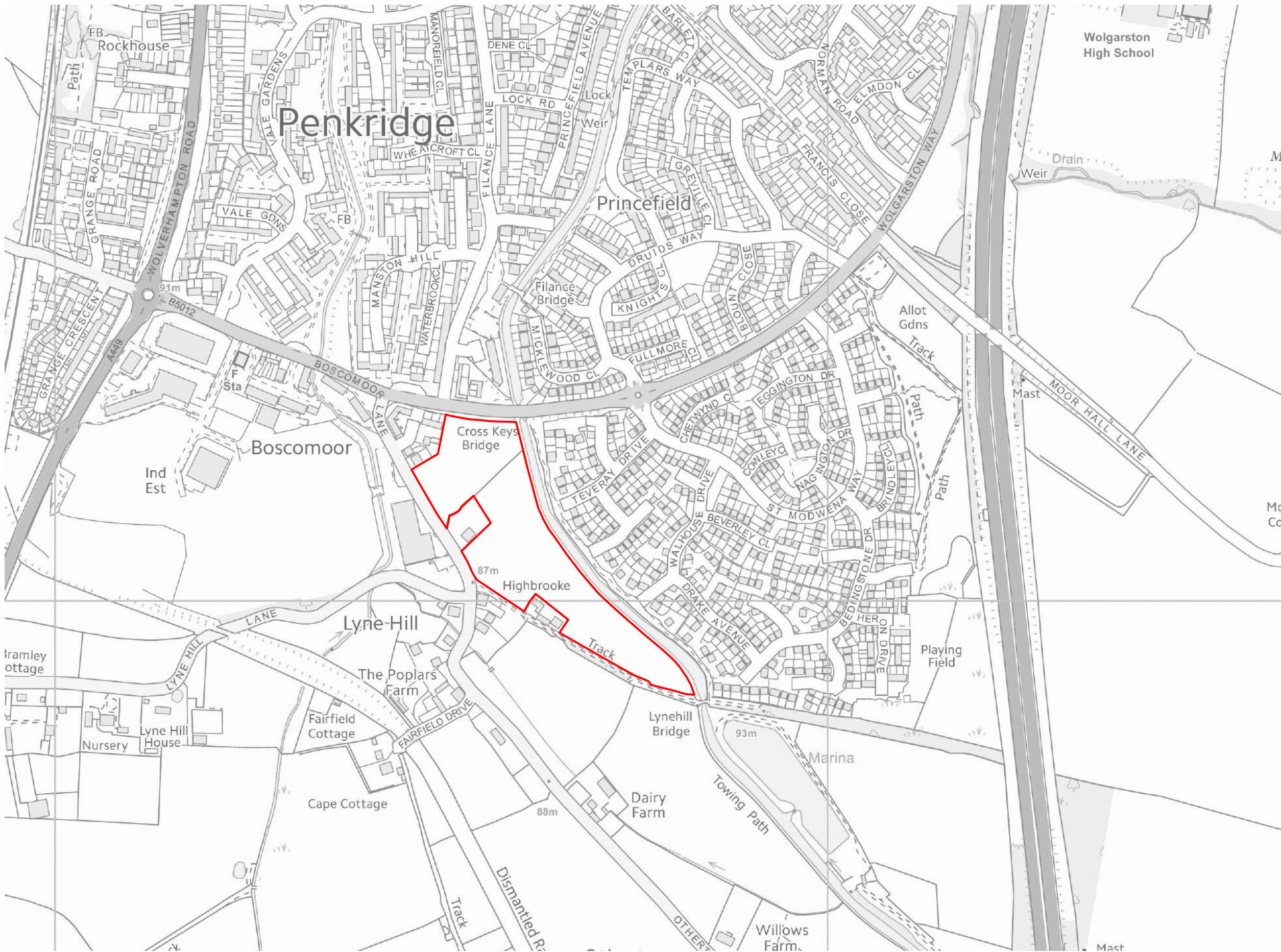
- 7.67 The site is deliverable and immediately available and, subject to allocation and removal of the land from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years. This represents a significant benefit when compared to larger strategic sites to the north of Penkridge, which are unlikely to deliver new homes in the short term.

8.0 Conclusion

- 8.1 This representation is made by Pegasus Group on behalf of Richborough Estates Limited to the South Staffordshire Local Plan Review, Preferred Options (Regulation 18) consultation. This representation relates to land at Boscomoor Lane, Penkridge, which Richborough Estates is promoting for residential development.
- 8.2 Richborough Estates is supportive of the Local Plan Review overall. However, it does not support the failure to allocate Land at Boscomoor Lane, solely based upon it falling within the Green Belt. There are many other sites that are allocated within the LPR at lower tier settlements which require Green Belt release. It is not justified to prioritise the retention of Green Belt land over sustainability considerations.
- 8.3 The information contained within this representation, read in conjunction with the appended illustrative masterplan, demonstrates that land at Boscomoor 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

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KEY

 Site Boundary

LAND AT BOSCOMOOR LANE, PENKRIDGE - SITE LOCATION PLAN



APPENDIX 2



BOSCOMOOR LANE
PENKRIDGE

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

Prepared by Pegasus Group on behalf of Richborough Estates
DECEMBER 2021 | BIR.5222_01



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Prepared by Pegasus Group
on behalf of Richborough Estates,
December 2021. Project code BIR.5222. Document ref BIR.5222_01.
Contact: Ben Cook

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PAGE 5	1	PAGE 9	2	PAGE 15	3	PAGE 35	4	PAGE 39	5	PAGE 45	6	PAGE 49	7
INTRODUCTION & DOCUMENT PURPOSE		PLANNING POLICY CONTEXT		THE SITE & SURROUNDING CONTEXT		VISION		INDICATIVE MASTERPLAN & DESIGN PRINCIPLES		DELIVERABILITY & KEY BENEFITS		SUMMARY & CONCLUSIONS	

THIS DOCUMENT IS DESIGNED TO BE VIEWED AS A3 DOUBLE SIDED



Development

E N A L

CHE TW YND

TEVERAY DRIVE

WALHOUSE DRIVE

BEVERLEY CL

DRAKE AVENUE

Highbrooke

The Poplars

Farm

Fairfield

DRIVE



B5012

WOLGARSTON WAY

BOSCOMOOR LANE

THE SITE





INTRODUCTION AND DOCUMENT PURPOSE

INTRODUCTION

1.1 The land at Boscomoor Lane represents a logical and appropriate extension to the highly sustainable settlement of Penkridge. The site is sustainable, is well located to a wide range of existing services and facilities and offers an opportunity to deliver new homes alongside supporting infrastructure as part of a balanced growth strategy for Penkridge.

RICHBOROUGH ESTATES

1.2 Richborough Estates is a responsible and specialist strategic land promotion business founded with the aim of working in partnership with landowners. Our projects are located throughout the country ranging from residential schemes of around 50 dwellings to large urban extensions, including sites located within the Green Belt.

1.3 Richborough Estates oversees the entire planning process from start to finish and works closely with local communities, Planning Officers and key stakeholders to create the most mutually beneficial schemes. Richborough Estates is seeking to apply this approach to the proposed development which is the subject of this Promotional Document.

1.4 Richborough Estates has an interest in the land at Boscomoor Lane. The extent of land controlled by Richborough is shown edged red on the Location Plan on Page 6 of this document.

DOCUMENT PURPOSE

1.5 South Staffordshire Council is currently in the process of reviewing their Local Plan to identify and direct growth within the District to 2038. This will include consideration of an appropriate housing requirement and a spatial strategy for distributing growth, informed by an updated settlement hierarchy. This Promotional Document demonstrates that the site at Boscomoor Lane will form a logical extension to Penkridge and that exceptional circumstances exist to justify its removal from the Green Belt.

1.6 This Promotional Document presents an analysis of the site and its surroundings and sets out in detail the case for the removal of the site from the Green Belt. This includes a review of the current and emerging planning policy position and an assessment of the site against the five purposes of the Green Belt contained in the National Planning Policy Framework (“The Framework”).

1.7 This document also sets out the Vision for the site, informed by a consideration of the constraints and opportunities and an Indicative Masterplan demonstrating how the Vision can be achieved through a well-designed scheme. The document concludes with a concise summary of the site, the proposed development and its key benefits.

1.8 Overall, this Promotional Document presents a sustainable site to supports the site’s future allocation through the Local Plan Review process and promotes its release from the Green Belt.

1.9 This document has been prepared with input from the following Consultant Team:

Planning:
Pegasus Group



Urban Design:
nineteen47



Landscape:
Tyler Grange



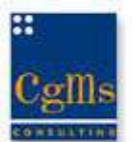
Access & Movement:
Hub



Flood Risk & Drainage:
BWB



Heritage:
CgMs





Development

E N A L

CHE TW YND

T E V E R A Y D R I V E

W A L H O U S E D R I V E

B E V E R L E Y L A N E

D R A K E A V E N U E

Highbrooke

The Poplars

Farm

Fairfield

D R I V E



2

PLANNING
POLICY CONTEXT

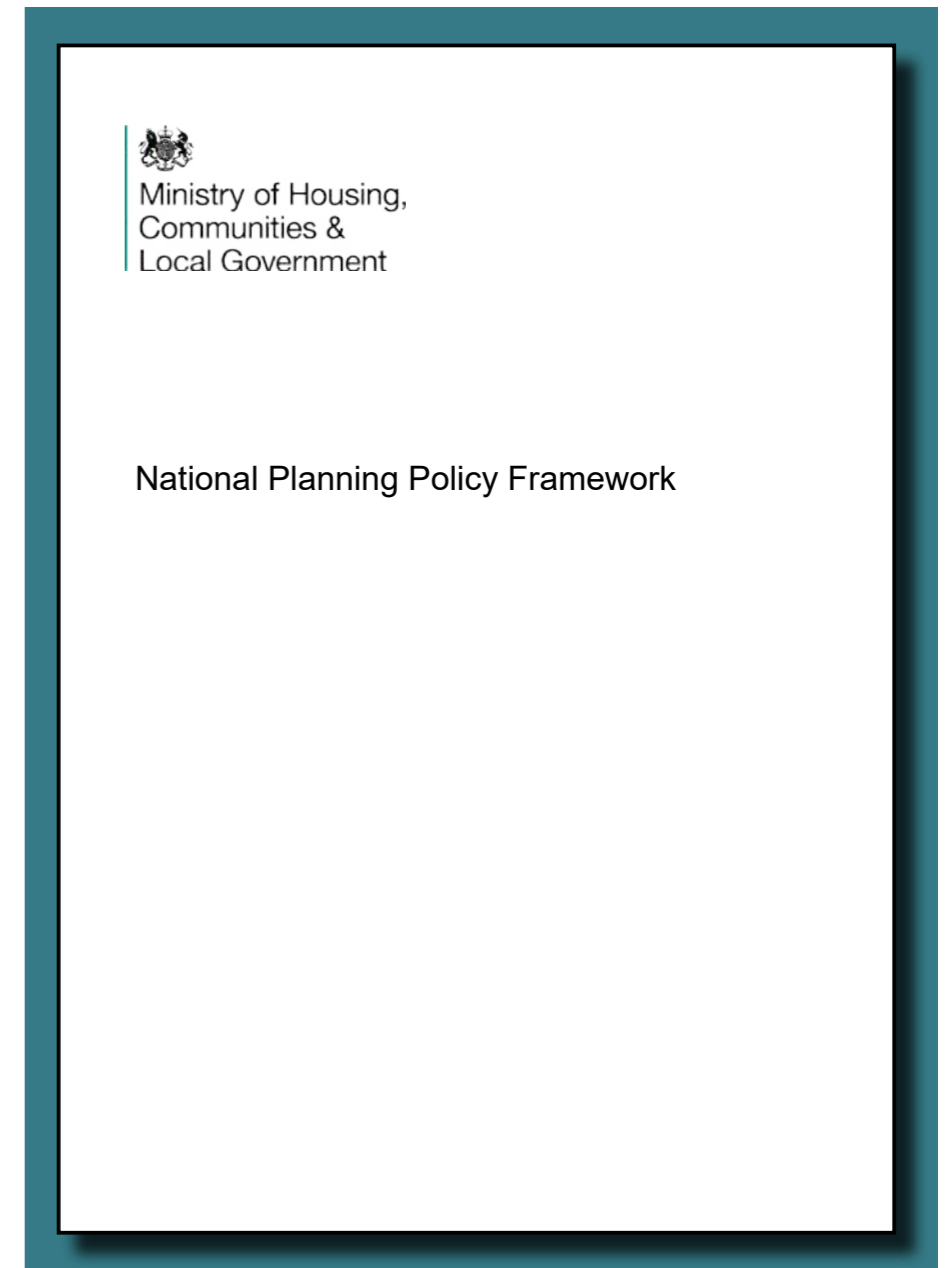


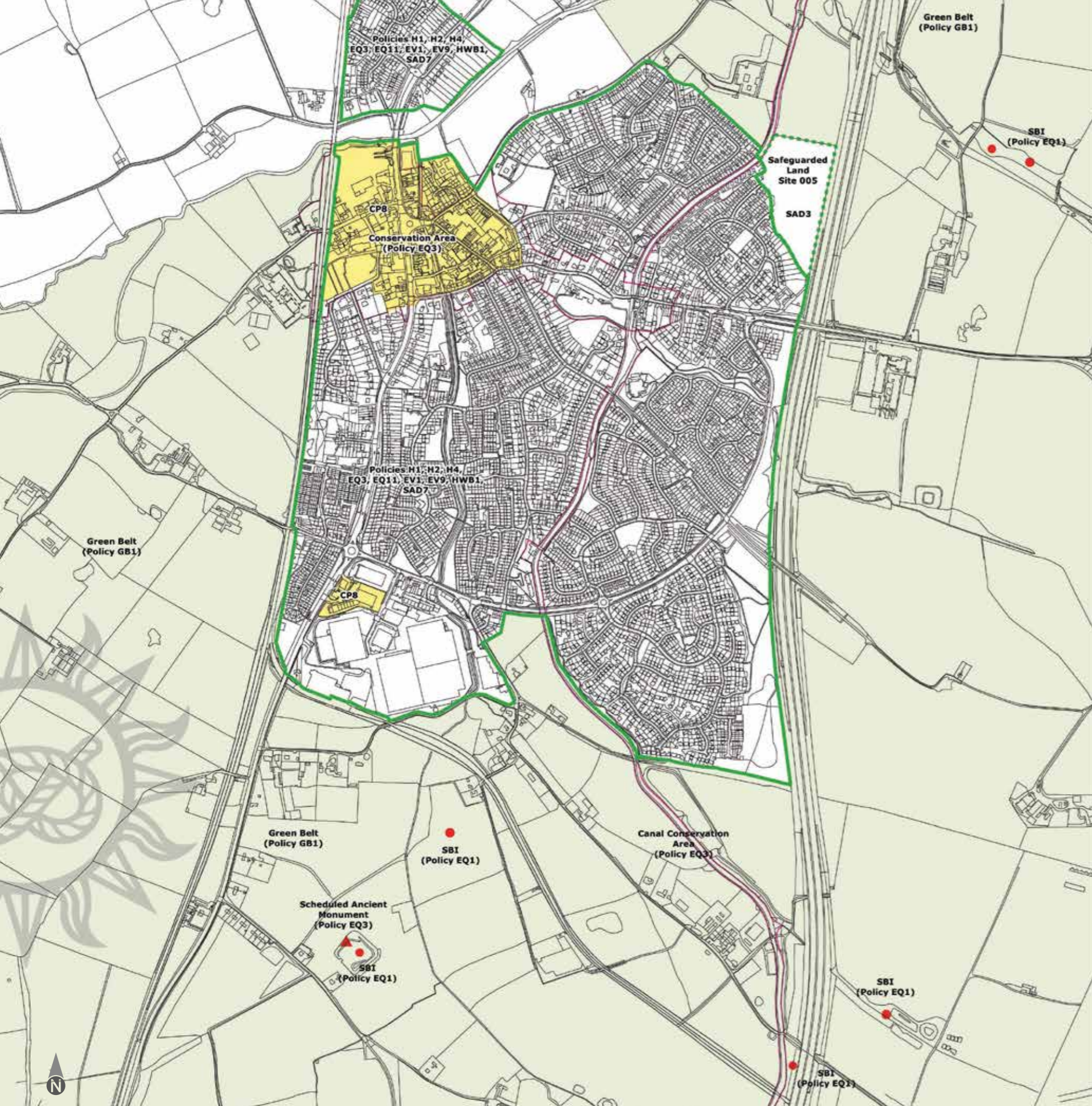


PLANNING POLICY CONTEXT

NATIONAL PLANNING GUIDANCE

- 2.1 In 2021, the Government published a revised National Planning Policy Framework (“Framework”) which replaces the previous guidance published in 2018 and 2019 and provides the overarching planning framework for England. Central to the Framework is a presumption in favour of sustainable development (paragraph 11). The Framework also seeks to boost the supply of housing and requires local authorities to plan positively for objectively assessed needs and maintain a sufficient supply of housing land.
- 2.2 Paragraph 139 of the Framework states that once the general extent of a Green Belt has been approved, it should only be altered in ‘exceptional circumstances’ through the plan-making process and that the amended Green Belt boundary should be “capable of enduring beyond the plan period”. There are exceptional circumstances which justify alteration to the Green Belt boundary in South Staffordshire District and the site offers an opportunity to release Green Belt in a sensitive manner, without harming its purposes and functions, as set out in paragraph 138 of the Framework.
- 2.3 Furthermore, paragraph 8 of the Framework sets out that sustainable development has three overarching objectives: economic, social and environmental. The proposed development accords with each of these objectives, contributing to building a strong, responsive and competitive economy, supporting strong, vibrant and healthy communities and continuing to protect and enhance the natural, built and historic environment.
- 2.4 Chapter 5 of the NPPF sets out how local authorities should boost significantly the supply of housing in order to deliver sufficient supply of homes. The land to the west of Wrottesley Park Road, Perton, represents a deliverable site that is available, achievable and viable and the provision of housing on the wider site would boost the supply of housing in the District.





CONSERVATION AREAS | NOT TO SCALE

EXISTING DEVELOPMENT PLAN

- 2.5 The Development Plan for South Staffordshire currently comprises the adopted Core Strategy (adopted 11th December 2012) and the Site Allocations Document (adopted 11th September 2018).
- 2.6 The Core Strategy establishes the strategic policies for the District, notably the housing requirement and distribution of housing (Core Policy 1 and Core Policy 6), whilst the Site Allocations Document provides a range of allocations to deliver the requirements set out within the Core Strategy.
- 2.7 The policies map identifies the following designations relevant to the site:
 - Green Belt (Policy GB1)
 - Canal Conservation Area (Policy EQ3)
- 2.8 Penkridge does not lie within a Neighbourhood Area Designation and therefore a Neighbourhood Plan has not been progressed to date.

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW

- 2.9 The South Staffordshire development plan currently comprises the South Staffordshire Core Strategy (adopted in December 2012) and the South Staffordshire Site Allocations Document (adopted in September 2018). The current Strategy covers the period 2006-2028 and sets a housing requirement of at least 3,850 new homes to be delivered within this period which, at 175 dpa, is considerably lower than the need that has now been identified.
- 2.10 The Site Allocations Document (SAD) commits the District Council to carrying out an early review of the development plan in order to respond to the increasing need for development, both within South Staffordshire and the wider housing market area. The SAD also requires a new Local Plan to be submitted for an Examination in Public (EiP) by 2021.
- 2.11 Richborough Estates supports the District Council's decision to carry out a review to ensure an up to date planning policy framework is in place to shape the District to 2038. The review provides an opportunity to address housing need, reflect new national planning guidance and provide a meaningful contribution to meeting needs of neighbouring authorities, where it can be demonstrated that they are unable to do so.

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

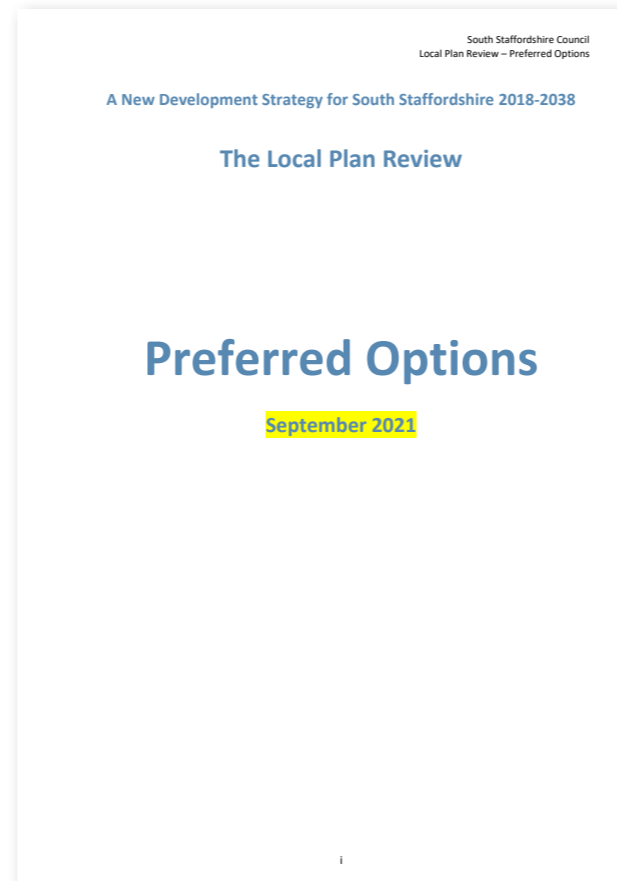
Issues and Options Consultation	Oct/Nov 2018
Strategic Spatial Strategy and Infrastructure Delivery Consultation	Autumn 2019
Preferred Options Document	Autumn 2021
Publication Document	Summer 2022
Submission of Local Plan	Winter 2022/23
Local Plan Examination	Spring 2023
Adoption of Local Plan	Winter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

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

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

2.15 A revised Settlement Hierarchy is set out within the Local Plan Review, which highlights Penkrudge as a “Tier 1” settlement. Tier 1 settlements are considered to be the most sustainable of the District’s villages, with the greatest access to services and facilities. It is concluded that:

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



2.16 Approximately 80% of South Staffordshire lies within the West Midlands Green Belt. The Council acknowledges that it may be necessary to consider Green Belt boundaries in some locations to accommodate the necessary levels of growth in a sustainable manner. The combined requirements of an increased OAN and the potential for meeting an element of the overspill requirement is likely to increase pressures for Green Belt releases, given the lack of urban capacity and the small proportion of the district that lies outside the current Green Belt designation.

2.17 Penkrudge is constrained by Green Belt to the east, west and south of the village. Capacity of the village to accommodate development to the north is finite, with constraints present, including those relating to landscape character and flood risk. In the context set out above it is clear that further release of Green Belt land is required to assist in the delivery of the balanced growth in sustainable locations such as Penkrudge. In addition, further housing growth within the village will be required in the longer term, beyond the proposed plan period and therefore further safeguarded land should be identified within Penkrudge to allow for future needs to be met.

CASE FOR GREEN BELT RELEASE

2.18 Given the need to accommodate an increased amount of housing and employment land, the Council concluded there were exceptional circumstances to release Green Belt land through the adoption of the Site Allocations Document. The need to consider Green Belt release through the Local Plan Review process is acknowledged through the Spatial Housing Strategy and Infrastructure Delivery Consultation document to support the preferred strategic option for growth. There are exceptional circumstances that exist for the targeted release of Green Belt land in Penkrudge to meet identified housing needs in a sustainable location within this Tier 1 village.

2.19 Land at Boscomoor Lane has no importance in respect of Green Belt purpose, in part because it is bounded on three sides by the existing urban extent of Penkrudge.



opment

ANAL

CHE TW YND

TEVERAY DRIVE

WALHOUSE DRIVE

BEVERLEY CL

DRAKE

AVENUE

Highbrooke

The Poplars

Farm

Fairfield

DRIVE



3

THE SITE AND SURROUNDING CONTEXT





THE SITE AND SURROUNDING CONTEXT

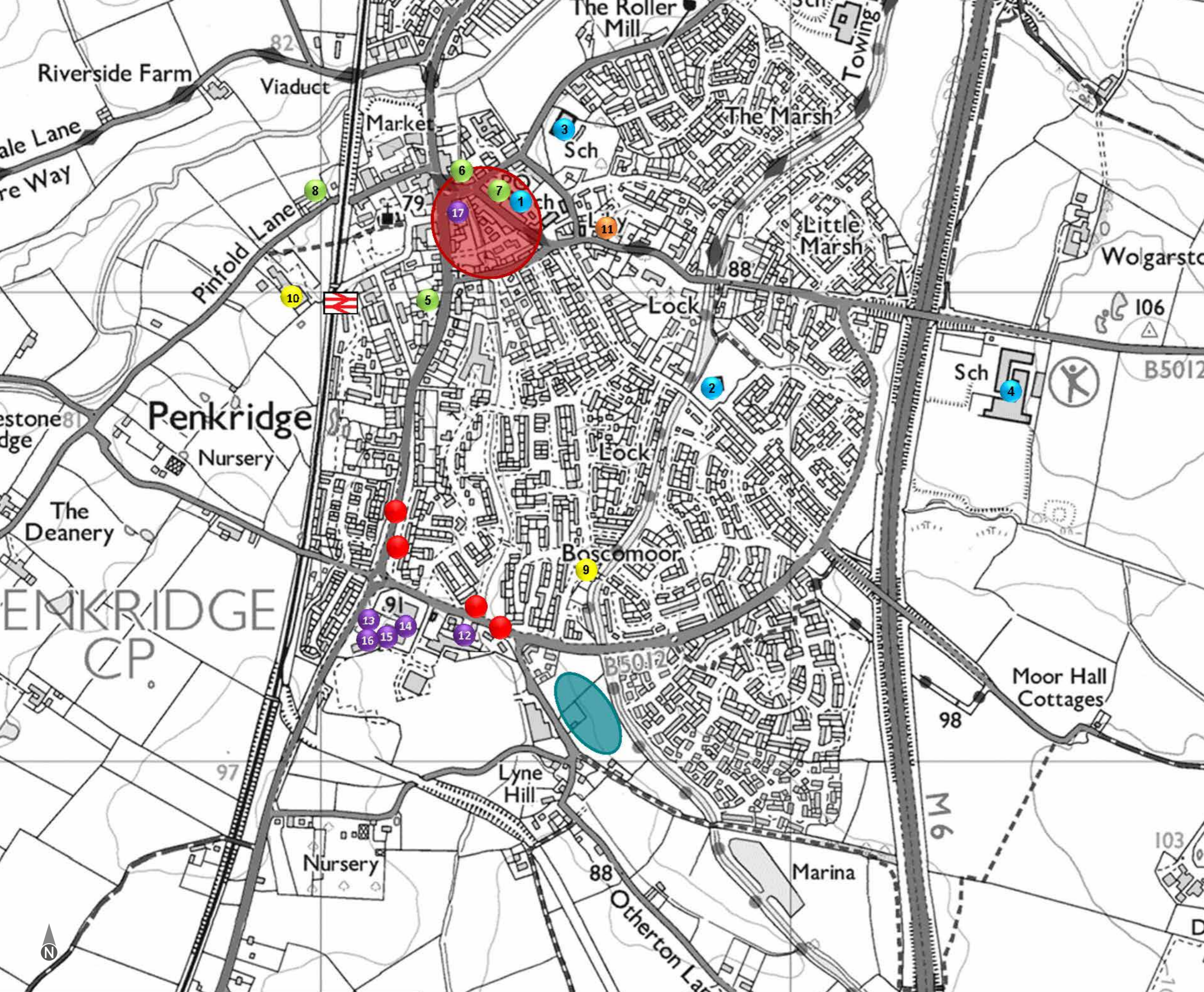
LAND AT BOSCOMOOR LANE

- 3.1 The site adjoins the southern edge of the urban area of the village, immediately south of Wolgarston Way and to the south of the Staffordshire and Worcestershire Canal. The site is visually contained, enclosed by development on three sides, and includes an area of agricultural land and a residential dwelling with associated garden.
- 3.2 The site comprises two irregular-shaped grassland fields separated by a typical gappy hedgerow, amounting to approximately 3.8 hectares. To the north, Wolgarston Way with associated residential properties overlooks the northern part of the site from a raised vantage point. A small number of properties to the south of Wolgarston Way influence the north western corner of the site.
- 3.3 To the east of the site lies a large number of existing residential properties beyond the Staffordshire and Worcestershire Canal with views across the site. The Cross Britain Way runs along the Canal's western edge adjacent to the site. Development fronting the Canal should respect the character and locality with a set back to retain the good quality tree stock and hedgerow.

- 3.4 To the west, the under-construction development off Boscomoor Lane will soon provide a further urban influence to the site. Public footpath 'Penkrige 19(a)' with associated hedgerows and mature trees provide the boundary to the south of the site, separating it from the fields beyond whilst restricting intervisibility.
- 3.5 The hedgerow field boundaries provide containment and structure and are also characteristic features within the local landscape. They should be retained and enhanced where possible to strengthen the visually-contained nature of the site.
- 3.6 The site is generally flat with no constraints topographically.
- 3.7 Richborough Estates has secured an interest in this site.

SURROUNDING AREA

- 3.8 The site is located adjacent to the current built up area of Penkrige with good access to a range of services and facilities, including being within walking distance of its many facilities and bus links.
- 3.9 The site provides an opportunity to deliver much needed housing, together with all necessary supporting infrastructure.



- Legend**
-  Site Location
 -  Rail Station
 -  Bus Stop
 -  Penkridge Town Centre (including Sainsbury's Local, Bakery, Barbers, takeaways, Penkridge Markets)
 -  1 St Michael's First School
 -  2 Princefield First School
 -  3 Marshbrook First School
 -  4 Wolgarston High School
 -  5 Dentist
 -  6 Opticians
 -  7 Pharmacy
 -  8 Penkridge Medical Practice
 -  9 The Cross Keys Public House
 -  10 Penkridge Sports and Recreation Centre
 -  11 Library
 -  12 Vehicle Repair Shop
 -  13 Petrol Filling Station
 -  14 Co-op Food
 -  15 Hairdressers
 -  16 Takeaways
 -  17 Nationwide Building Society

LOCAL FACILITIES | NOT TO SCALE

LOCAL FACILITIES, AMENITIES & SERVICES

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

LOCAL FACILITY	APPROXIMATE WALKING DISTANCE
Vehicle Repair Shop	420m
The Cross Keys Public House	545m
Petrol Filling Station	665m
Co-Op Food Store	695m
Hairdressers	700m
Takeaways (Indian, Chinese and Fish 'n' cHips	770m
Dentist	1.2km
Princefield First School	1.2km
Opticians	1.3km
Library	1.3km
Nationwide Building Society	1.3km
St Michael's First School	1.3km
Pharmacy	1.4km
Sainsbury's Local	1.5km
Penkridge Sports and Recreation Centre	1.6km
Penkridge Medical Practice	1.7km
Marshbrook First School	1.8km
Wolgarston High School	1.9km

LOCAL FACILITIES DISTANCES FROM SITE





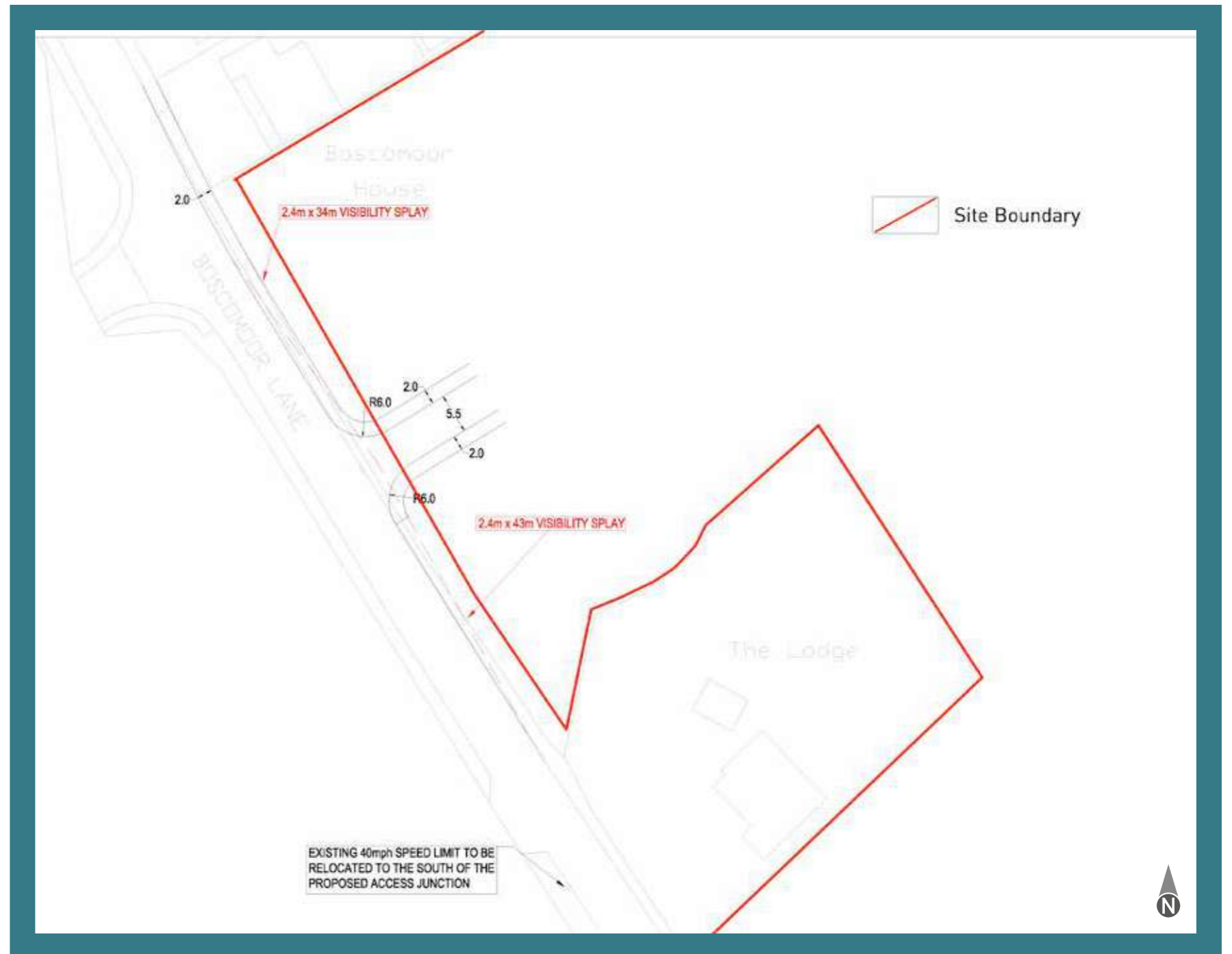
ACCESS & MOVEMENT

SUSTAINABLE TRANSPORT

- 3.12 The site will provide pedestrian access onto Boscomoor Lane, to the west of the site. A public footpath runs to the south of the site, connecting south to Otherton and the marina whilst also providing a connection to the canal towpath that runs along the western side of the Staffordshire and Worcestershire Canal.
- 3.13 On the northern side of the B5012 there are a number of footpaths that run through green areas that provide a link towards the centre of Penkridge. These provide pleasant traffic free walk route to local facilities within the town centre.
- 3.14 It is also understood that as part of the proposed residential development to the west of Boscomoor Lane (which is currently under construction), there is a planning condition which requires a new Pelican crossing to be provided across Boscomoor Lane (B5012).
- 3.15 The towpath provides a traffic-free cycle route that runs to the east of the proposal site and provides a link to Stafford in the north. A shared use footway/cycleway is also located alongside the A449.
- 3.16 Residential roads to the north of the B5012 within the vicinity of the site are subject to a 30mph speed limit and considered safe for use by cyclists.
- 3.17 The nearest bus stops to the site are located on Wolgarston Way, with the nearest being located within 400m of the centre of the proposed development site; bus services 75, 75A and 75B run from this location.
- 3.18 Further services run from stops located on Wolverhampton Road (A449), located within 660m of the centre of the proposed development site; bus services 54 and 54A run from this location.
- 3.19 The 75/75A/75B service operates between 6:10am and 9:00pm Monday to Friday and 7:10am and 9:00pm on Saturdays. These services can be used to access schools, including Wolgarston High School and Stafford Manor High School as well as providing access to employment opportunities within Stafford and Cannock.
- 3.20 The 54/54A service operates between 6:40am and 7:00pm Monday to Friday and 9:00am to 6:25pm on Saturdays. These services can be used to access Wolverhampton University, South Staffordshire College (Rodbaston Campus) and Stafford Manor High School as well as Stafford Railway Station and Wolverhampton Bus Station for onward journeys further afield.
- 3.21 The 54/54A service also runs to key employment areas such as the i54 business park and Pendeford business park.
- 3.22 Penkridge Rail Station is located c.1.3km from the proposed development site, accessed via an approximately 15-minute walk. The station benefits from 20 cycle parking spaces and 15 free of charge car parking spaces, with 4 accessible spaces. Furthermore, an overflow car park to the rear of the Station provides an additional c70 spaces, with additional paid parking available at the Penkridge Sports and Recreation Centre. The station provides regular services north to Liverpool Lime Street and south to Birmingham New Street. The nearest neighbouring stops of Stafford and Wolverhampton are considered to be the likely destinations for employment and education commuters.
- 3.23 The location of the proposed development site is therefore seen to be in a sustainable location in terms of the availability of alternatives to the private car that offer a realistic alternative to the private car for commuting and travelling to schools as well as for leisure purposes.

ACCESS

- 3.24 Vehicular access to the site is proposed directly off Boscomoor Lane along the western frontage of the site. The proposed access junction will take the form of a priority T-junction and is positioned approximately 80m south of Boscomoor Court and approximately 40m south of the existing junction on the western side of Boscomoor Lane which will provide access to a new residential development which is under construction.
- 3.25 The proposed access road will be 5.5m wide with 2.0m wide footways on both sides of the carriageway. The access proposals include a footway which links the site access junction to the existing footway provision further north on the eastern side of Boscomoor Lane. In order to achieve a 2.0m wide footway link, Boscomoor Lane has been narrowed from approximately 6.3m to just over 5.5m in width.
- 3.26 Visibility splays to/from the proposed access junction are in line with guidance set out in Manual for Streets 2 (MfS2).
- 3.27 It is considered appropriate to provide pedestrian access alongside the proposed vehicular access. Footways 2.0m in width have been proposed on both sides of the carriageway.
- 3.28 A 2.0m wide footway will then be provided on the eastern side of Boscomoor Lane, which will provide a link to the existing footway provision further north which goes on to connect to existing footways along the B5012.
- 3.29 A Public Right of Way (PRoW) runs along the southern edge of the site. The potential to provide a link to this PRoW will be investigated as part of the development proposals.



PROPOSED SITE ACCESS | NOT TO SCALE



Under-Construction Development

Properties set back beyond Private Driveways and fronting onto 'Penkrige 19(a)' Footpath. This will provide an offset allowing for the retention and enhancement of existing boundary vegetation.

Staffordshire and Worcestershire Canal with adjacent Cross Britain Walk route

Development set back and fronting onto the Staffordshire and Worcestershire Canal. This will provide a sympathetic frontage reflecting the large plots to the east of the Canal whilst allowing for areas of additional tree planting.

Retention and enhancement via additional tree planting will ensure a permanent and defensible Green Belt boundary to the south.

Area of Open Space with opportunities for amenity/recreation and landscape and biodiversity benefits.

-  Site Boundary
-  Potential Public Open Space
-  Potential Development Areas
-  Properties Fronting Open Space with Outlook onto Staffordshire and Worcestershire Canal
-  Retention of Existing Hedgerows and Trees within Developable Area
-  Existing Public Rights of Way (PRoW)
-  Existing Public Rights of Way (PRoW)
-  New Green Belt Boundary with Retained and Enhanced Existing Hedgerow with Additional Tree and Woodland Planting to Create a Robust and Permanent Green Belt Boundary

Penkrige 21 Footpath

Penkrige 19(a) Footpath

CONSTRAINTS AND OPPORTUNITIES | NOT TO SCALE

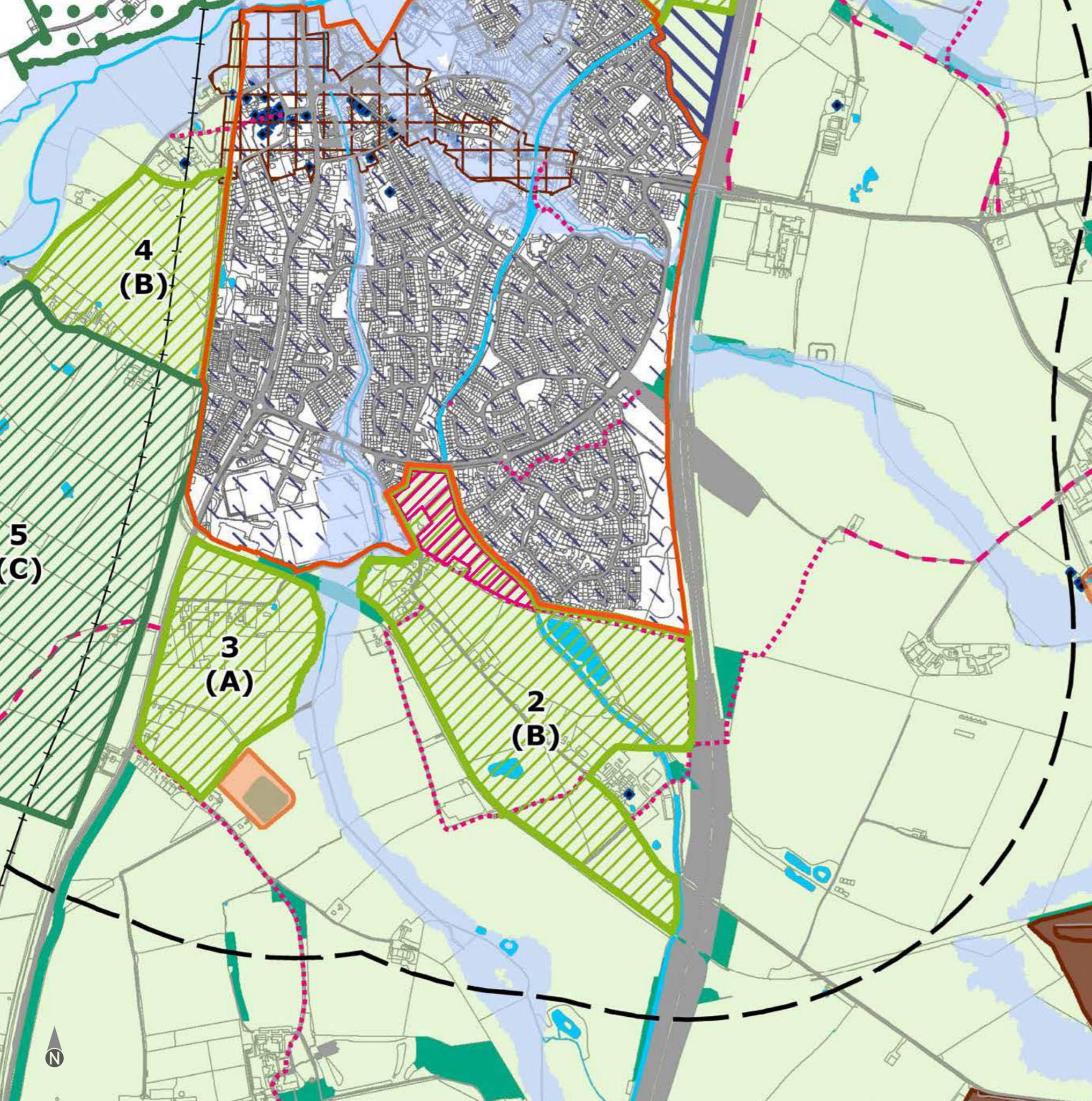
HERITAGE & ARCHAEOLOGY

- 3.30 CgMs Heritage has undertaken an initial appraisal of the extent and nature of known built heritage assets within the site and surrounding area. The site is located immediately west of the Staffordshire and Worcestershire Conservation Area, which includes the canal and towpath. In addition, there are several canal bridges and locks located within this Conservation Area which are recognised locally as non-designated heritage assets, the closest being Lyne Hill Bridge (No.83) which is located adjacent to the site's south-east corner.
- 3.31 Located approximately 0.5km south-west of the site is the Grade II listed Otherton Farmhouse, which has several associated historic outbuildings. As there is the potential for limited inter-visibility between the site and the farmstead, their significance may be affected by the development of the site.
- 3.32 The identified built heritage assets are not considered to be a constraint to the development of the site as future development will incorporate mitigation measures to minimise any impact on their significance. The level of harm to the Conservation Area and Listed Buildings would not exceed less than substantial and the impact on the non-designated heritage assets would be considered with regard to paragraph 197 of the NPPF. Any future planning application would be supported by a Built Heritage Statement which would assess the significance of the potentially affected designated and non-designated built heritage assets, and any impact on their respective significance from the development of the site.

LANDSCAPE & VISUAL

POLICY CONTEXT

- 3.33 The site does not lie within or in close proximity to any areas designated in recognition of their landscape quality at either a national or local level. The site does lie within the Green Belt.
- 3.34 The site is situated within South Staffordshire district, located to the southern urban periphery of Penkridge. Applicable local policy objectives address the need to conserve and enhance the landscape of the Green Belt and the Green Infrastructure of the District.
- 3.35 Public footpath 'Penkridge 19(a)' (shown on the Landscape Opportunities and Constraints Plan) runs adjacent to the southern boundary from Boscomoor Lane towards the Staffordshire and Worcestershire Canal. Footpath 'Penkridge 21' runs in close proximity to the western site boundary although allows for no views due to intervening development and vegetation. A network of further public rights of way are present across the wider landscape.



- Penkridge**
- 1KM Buffer
 - Settlement Boundary
 - South Staffordshire District Boundary
 - Total area of housing, both in policy CP6 and the safeguarded land requirement
- Green Belt Parcels**
- Makes a considerable contribution to Green Belt Purposes
 - Makes a contribution to Green Belt Purposes
 - Makes a more limited contribution to Green Belt Purposes
- Relative Rankings A-E' - 'Parcels ranked 'A' make the least contribution to the Green Belt and 'E' the most, for this settlement
- Parcels in 'Open Countryside' outside Green Belt
 - Footpath
 - Bridleway
 - BOAT
 - Railways
 - Roads
 - Rivers/Canals and Lakes
 - AONB
 - Conservation Areas
 - Ramsar
 - Special Areas of Conservation
 - Special Protection Areas
 - National Nature Reserves
 - Local Nature Reserves
 - Scheduled Monuments
 - SSSIs
 - Ancient Woodland
 - Flood Zone 3b
 - Registered Parks and Gardens
 - Listed Buildings
 - Hatherton Canal Protection Line
 - GB2 - Safeguarding Land
 - EQ4 - Historic Landscape Areas
 - HWB1 - Open Spaces, Sport and Recreation
 - OC1 - Open Countryside
 - National Inventory of Woodland and Trees 2012
 - Green Belt

SOUTH STAFFORDSHIRE GREEN BELT STUDY | NOT TO SCALE

THE WEST MIDLANDS GREEN BELT

- 3.36 The site is situated within South Staffordshire District, located on the western periphery of Wolverhampton at Perton, within the West Midlands Green Belt.
- 3.37 The Council has commissioned a Green Belt Assessment, alongside the City of Wolverhampton, Dudley, Sandwell and Walsall, (together comprising the Black Country authorities). The Study forms an important piece of evidence for the partial review of the Black Country Core Strategy (the Black Country Plan) and the strategic site allocations and individual development plans of the Black Country Authorities, as well as South Staffordshire District.
- 3.38 The Green Belt Study has two stages; the first is to assess 'strategic variations' between the contribution of land to the five purposes of the Green Belt, whilst the second includes a more focused assessment of the potential 'harm' of removing land from the Green Belt. Alongside the Green Belt Study, a Stage 3 assessment involved undertaking a landscape sensitivity assessment in order to assess the sensitivity of land within the South Staffordshire to housing and employment development. Whilst, there is a relationship between landscape sensitivity and Green Belt contribution/harm in that physical elements which play a role in determining landscape character, there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land. As such, the findings of the Stage 3 landscape sensitivity assessment for South Staffordshire and the Black Country are presented in a separate document (Landscape Study 2019) and is considered later in this Vision Document.

CONTRIBUTIONS TO GREEN BELT PURPOSES

- 3.39 The National Planning Policy Framework (NPPF) states that the Green Belt should serve the five following purposes:
- To check the unrestricted sprawl of large built-up area;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.40 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Once established, Green Belts should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating

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

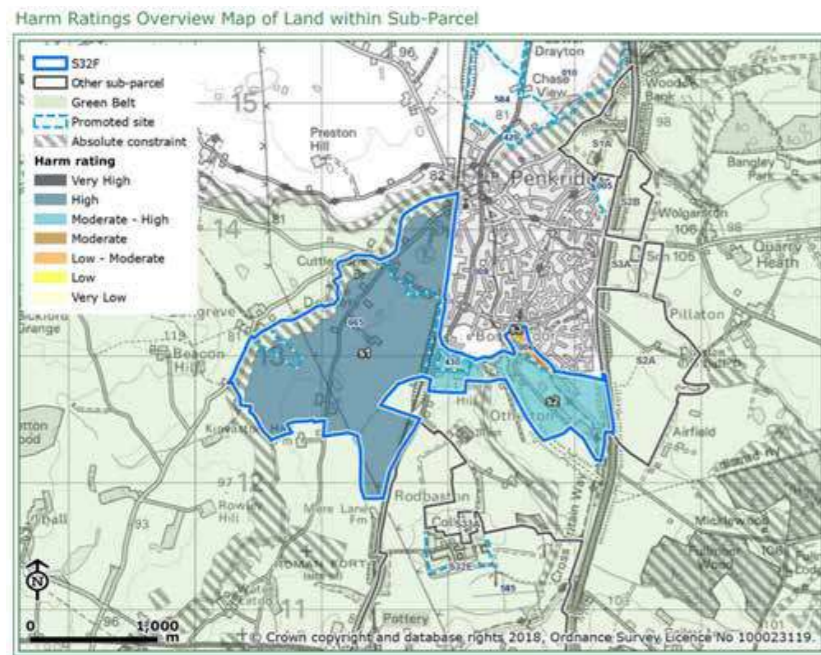
- 3.41 The Council's Green Belt Study shows Land at Boscomoor Lane, Penkridge, as falling within Green Belt Sub-Parcel Ref S32F – 'West and south of Penkridge', which is identified as making the following contribution to the five purposes of the Green Belt:

GB PURPOSE	ASSESSMENT	RATING
P1: Checking the unrestricted sprawl of large built-up areas	Land is sufficiently separated or distant from a large built-up area for there to be no significant potential for urban sprawl from the large built up area.	Weak / No contribution
P2: Preventing the merging of neighbouring towns	Land plays no significant role due to the distance between the West Midlands conurbation and Stafford, and between Stafford and Cannock.	Weak / No contribution
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 S32F – WEST AND SOUTH WEST OF PENKRIDGE

3.42 The Study goes on to identify that, should Green Belt Sub-Parcel ref: S32Fs3 be released for development, the resulting harm would be 'low-moderate', stating:

“The sub-parcel makes a strong contribution to preventing encroachment on the countryside. This part of the sub-parcel is tightly contained by the existing inset settlement of Penkridge and contains some intruding urbanising elements. Release of this land would therefore simplify the Green Belt; creating a shorter boundary that is consistent with the boundary of the existing inset area of Penkridge.”



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

3.43 Richborough Estates supports the conclusions of the above assessment. Additional site-specific commentary regarding Land at Boscomoor Lane is provided below, in order to assist with the on-going consideration of the site.

To Check the Unrestricted Sprawl of Large Built-Up Areas

3.44 The site is situated between an under-construction development to the west and adjacent to the existing residential edge of Penkridge to the north and east. Boundaries are formed by the footpath Penkridge 19(a) to the south, the Canal to the east, Boscomoor Lane to the west and Wolgarston Way to the north.

3.45 As such, the site does not contribute to preventing the unrestricted sprawl of Penkridge, being contained by existing development and robust, permanent boundaries. As identified within the Council’s Green Belt Study, the release of the site would simplify the Green Belt; creating a shorter boundary that is consistent with the boundary of the existing inset area of Penkridge.

3.46 The site therefore makes a weak/no contribution to this purpose of the Green Belt.

To Prevent Neighbouring Towns from Merging into One Another

3.47 In contrast with the Council’s Review for the larger Parcel 2, the site is contained within the extents of the existing development at Penkridge, including the under-construction development to the west and development bounding the site to the south along Boscomoor Lane.

3.48 As set out above, the site is located within the confines of the existing built area of Penkridge. The development of the site will ‘round off’ the settlement edge and will therefore the built form extents to the south of Penkridge will remain. The development of the site will therefore not contribute towards the merging of neighbouring towns and accordingly makes no contribution to this purpose of the Green Belt.

To Assist in Safeguarding the Countryside from Encroachment

3.49 Whilst the site contains some characteristics of open countryside, such as an absence of built development, it remains that the site is surrounded on three sides by the built envelope of Penkridge.

3.50 The short southern section of the site adjacent to footpath Penkridge 19(a) has an urban edge character, with a mature hedgerow and hedgerow trees separating the grassland of the site to the fields to the south. If retained and enhanced with additional trees and the strengthening of the existing hedgerow, this could form a recognisable and permanent new Green Belt boundary. This would further strengthen the landscape structure and the physical and visual boundaries to the site at the interface with the wider landscape and Green Belt to the south.

3.51 It is therefore considered that the site makes a ‘moderate’ contribution to assisting in safeguarding the countryside from encroachment, rather than the ‘strong’ contribution identified within the Green Belt Study.

To Preserve the Setting and Special Character of Historic Towns

3.52 As identified within the Council’s Green Belt Study, Penkridge is not a historic town and, as such, the removal of the site from the Green Belt would not conflict with this purpose of the Green Belt. Richborough Estates therefore agrees with the conclusions of the Green Belt Study, that the site makes a ‘weak/no’ contribution to preserving the setting and special character of historic towns.

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

3.53 Whilst it is acknowledged that all Green Belt land make a contribution towards encouraging the recycling of derelict and other urban land, the site and immediate area does not contain significant areas of brownfield land and would therefore not prejudice the redevelopment of urban land in this area. The release of the site from the Green Belt and allocation for residential development would therefore not significantly prevent the recycling of derelict land and other urban land.

3.54 It is therefore considered that the site makes a ‘moderate’ contribution to this purpose of the Green Belt, rather than the ‘strong’ contribution identified within the Green Belt Study.

SUMMARY OF GREEN BELT PURPOSES

4.55 Overall, it is therefore considered that Land at Boscomoor Lane, Penkridge, 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: S32Fs3. This contribution is summarised in the table below:

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

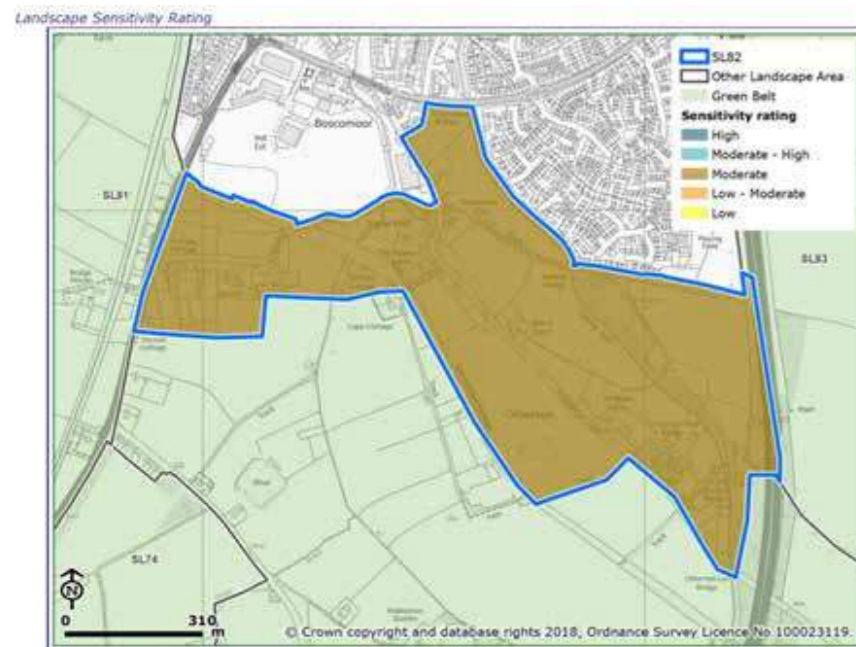
GREEN BELT PURPOSES SUMMARY: PARCEL S32F – WEST AND SOUTH WEST OF PENKRIDGE

GREEN BELT HARM

- 4.56 Richborough Estates agrees with the conclusion of the Green Belt Study in respect of Green Belt Harm, in that, should the site be released for development, the resulting harm would be ‘low-moderate’.
- 4.57 As identified previously, the site is tightly contained by the existing development and is inset within the existing built form of Penkridge. Release of this land would therefore simplify the Green Belt; creating a shorter boundary that is consistent with the boundary of the existing edge of Penkridge.

LANDSCAPE CHARACTER

3.58 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 Types: Ancient Clay Farmlands (west) and Settled Heathlands (east). The landscape area is situated immediately to the south of Penkridge. It is bounded by the A449 Stafford Road in the west, the M6 in the east and partly by a disused railway line in the south. The Study identifies that this is a small scale area which retains some sense of rural character, including some notable mature hedgerows and trees, but which is also influenced by its proximity to the urban fringe of Penkridge and the M6. Overall it is considered that the landscape sensitivity to residential development is moderate.



SITE-SPECIFIC CONTEXT

- 3.59 The site comprises two irregular-shaped grassland fields separated by a typical gappy hedgerow, amounting to approximately 3.8 hectares. To the north, Wolgarston Way with associated residential properties overlooks the northern part of the site from a raised vantage point. A small number of properties to the south of Wolgarston Way influence the north western corner of the site.
- 3.60 To the east of the site lies a large number of existing residential properties beyond the Staffordshire and Worcestershire Canal with views across the site. The Cross Britain Way runs along the Canal's western edge adjacent to the site. Development fronting the Canal should respect the character and locality with a set back to retain the good quality tree stock and hedgerow.
- 3.61 To the west, the under-construction development off Boscomoor Lane will soon provide a further urban influence to the site. Public footpath 'Penkridge 19(a)' with associated hedgerows and mature trees provide the boundary to the south of the site, separating it from the fields beyond whilst restricting intervisibility.
- 3.62 The hedgerow field boundaries provide containment and structure and are also characteristic features within the local landscape. They should be retained and enhanced where possible to strengthen the visually-contained nature of the site.
- 3.63 The site is generally flat with no constraints topographically.





1

VIEWS

3.64 Views from within the site are limited and localised due to the urban influence restricting distant views and mature boundary vegetation adding to the contained nature.

- **Viewpoint 1** shows the view from Wolgarston Way from the bridge over the Staffordshire and Worcestershire Canal to the north of the site. Views are possible across the northern field parcel, with glimpsed views towards the under-construction development off Boscomoor Lane to the west. The internal hedgerow separating the two irregular-shaped fields is gappy and provides only glimpsed views through at certain points when facing south. The viewpoint represents transient users and a number of residents of Wolgarston Way who would experience this view as part of their day-to-day experience.
- **Viewpoint 2** shows the view facing north west along the Cross Britain Way route adjacent to the Canal. It shows the maintained boundary hedgerow allowing for clear views between the site and the existing properties to the east.



2



3



VIEW LOCATIONS | NOT TO SCALE

- **Viewpoint 3** shows the view from the footpath Penkridge 19(a), on the bridge above the Canal facing north. The raised vantage point allows for glimpsed views towards the southern part of the site between intervening trees and boundary hedgerows.
- **Viewpoint 4** represents a view from where footpath 'Penkridge 19(a)' meets Boscomoor Lane to the west of the site. Existing properties limit views across the site in addition to the gappy boundary hedgerow and trees. Properties adjacent to the Canal to the east of the site are visible in the distance, providing a further urban influence to the view.
- **Viewpoint 5** shows the view further along Boscomoor Lane towards the site's north west corner facing south east. It shows the existing properties off Boscomoor Lane adjacent to the site boundary, with the entrance to the under-construction development to the right which will soon provide an urban influence to this boundary.
- **Viewpoint 6** shows the view from Wolgarston Way facing south east. Existing properties in the locality provide the urban context, although this view does highlight the level change from the road to the site.

3.65 Overall, the main receptors of the site with potential visibility are transient users and residents of Wolgarston Way and Boscomoor Lane and recreational users of footpath 'Penkridge 19(a)' which runs along the site's eastern boundary adjacent to the Canal. With the design carefully ensuring the retention of key features such as the internal hedgerow and boundary vegetation, the visual context will remain largely unchanged with a limited nature and extent of views. No distant views are possible, with the proposed development providing no uncharacteristic features.



ECOLOGY

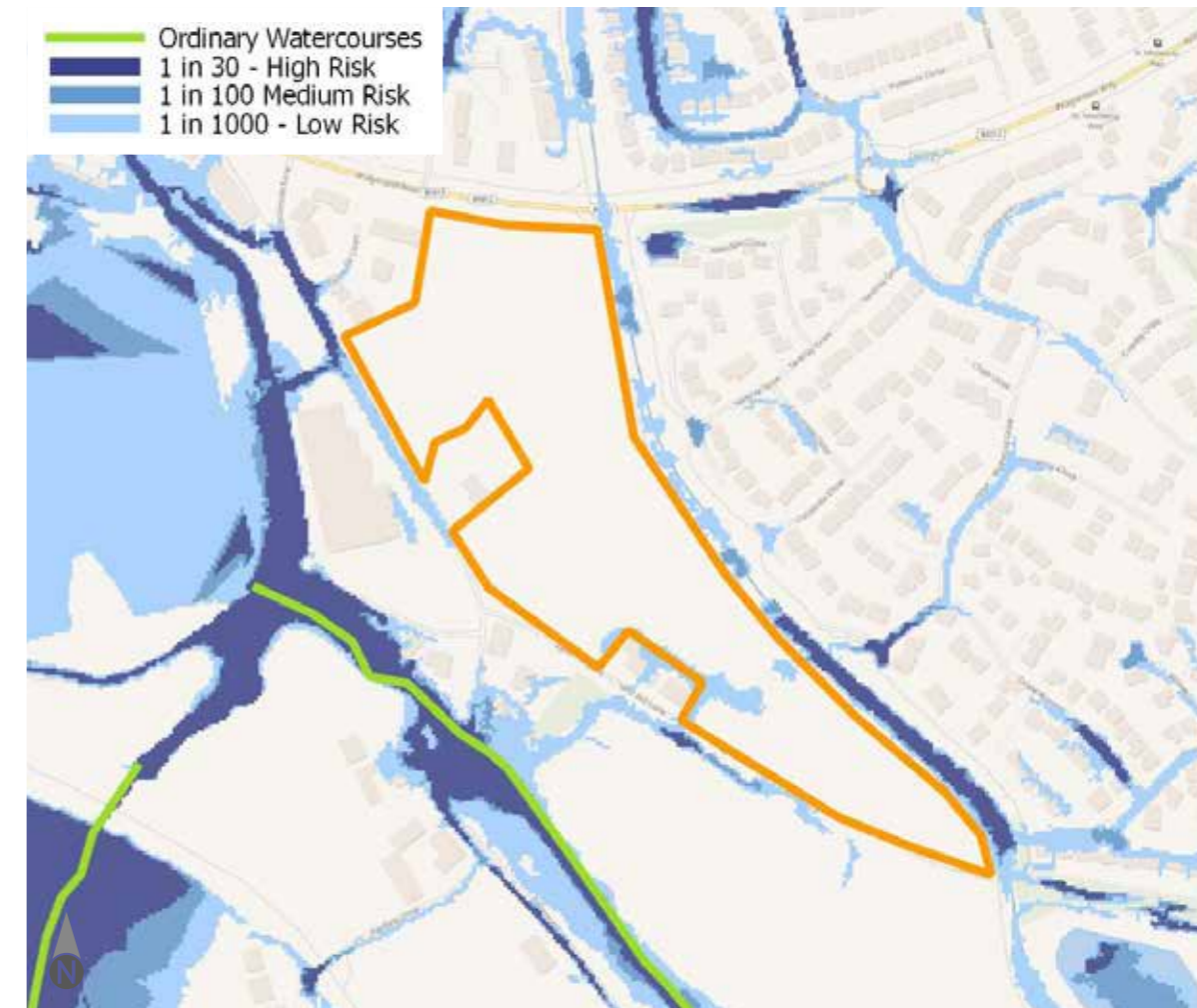
DESIGNATIONS

- 3.66 There are no statutory sites of nature conservation importance at an international (e.g. Special Areas of Conservation) or national (e.g. Sites of Special Scientific Interest) scale located within a 2km radius of the site.
- 3.67 There are no local nature conservation or wildlife sites within or adjacent to the site.

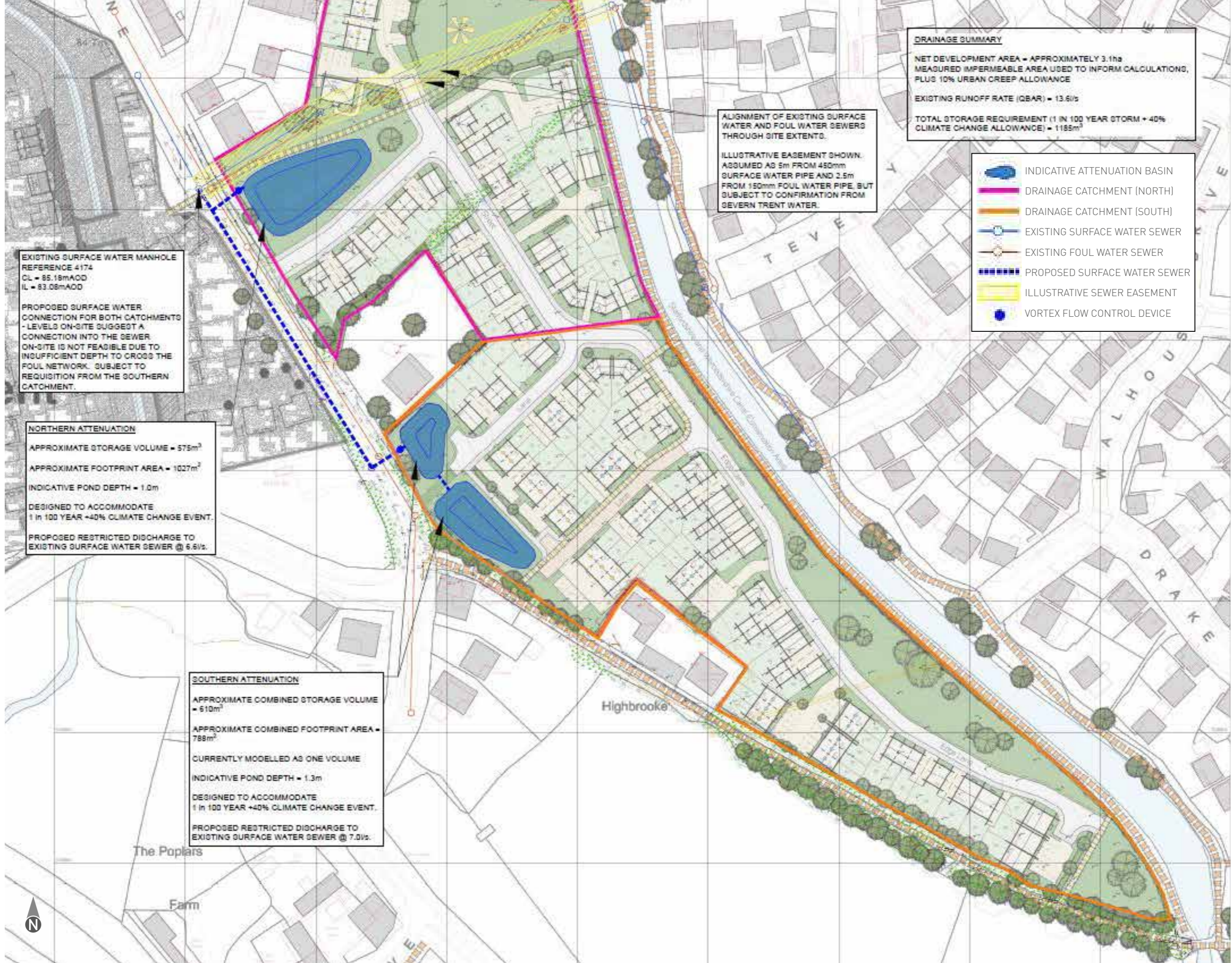
FLOOD RISK & DRAINAGE

- 3.68 According to the Environment Agency Flood Map for Planning, the application site is located entirely within Flood Zone 1 (Low Probability), which is land defined as having less than a 1 in 1000 annual probability of river or sea flooding. The nearest Environment Agency Main River is the unnamed tributary of the River Penk, which is located approximately 50m west of the site.
- 3.69 The Staffordshire and Worcestershire Canal runs along the eastern boundary of the site. Further investigation is needed to better define the level of risk posed to the development, however, due to the controlled and maintained nature of canals, it is not expected to pose a barrier to development.
- 3.70 Underlying geology based upon British Geological Survey (BGS) mapping is identified to comprise of Sandstone with superficial deposits of till. Such a permeable geology has the potential for groundwater emergence. Further review of any available borehole records along with any relevant Strategic Flood Risk Assessment (SFRA) data, to understand the potential risk further.

- 3.71 A surface water and foul water sewer are present on the site, which will require a suitable easement. An alternative option could be to undertake a diversion of the sewers, both options would be subject to further consultation with STW at the appropriate juncture. The presence of the sewers on site is not thought to pose a significant flood risk to the development.
- 3.72 The existing site is greenfield in nature. The topography of the site falls to the west, towards Boscomoor Lane. The site is considered to be at low risk from fluvial, surface water or reservoir sources, subject to appropriate mitigation measures where necessary.
- 3.73 An appropriate Surface Water Management Strategy which complies with the latest local and national advice will be implemented on the site to attenuate the increase in surface water runoff caused by development. As a first option and in line with the drainage hierarchy, infiltration should be considered for the disposal of surface water due to the expected favourable ground conditions and Sandstone bedrock geology. In the event that infiltration is not viable, the rate at which the runoff is discharged into the surface water sewer on site will be restricted to the equivalent greenfield runoff rate, preventing an increase in flows leaving the site and thus ensuring that the development does not have a detrimental impact upon flood risk elsewhere.
- 3.74 Through the application of Sustainable Urban Drainage Systems (SuDS), the additional surface water will be stored within the site and subjected to multiple stages of treatment to guarantee that the water quality in the wider drainage network is protected. Wherever possible SuDS features will be above ground to enhance the aesthetic amenity of the development and provide valuable habitats for the local wildlife. The attenuation provided will be appropriately sized to include an allowance for climate change. Example SuDS features that will be incorporated into the development wherever possible include attenuation basins, permeable paving and swales.



SURFACE WATER FLOOD RISK MAPPING | NOT TO SCALE



DRAINAGE SUMMARY
 NET DEVELOPMENT AREA = APPROXIMATELY 3.1ha
 MEASURED IMPERMEABLE AREA USED TO INFORM CALCULATIONS, PLUS 10% URBAN CREEP ALLOWANCE
 EXISTING RUNOFF RATE (QBAR) = 13.6l/s
 TOTAL STORAGE REQUIREMENT (1 IN 100 YEAR STORM + 40% CLIMATE CHANGE ALLOWANCE) = 1185m³

- INDICATIVE ATTENUATION BASIN
- DRAINAGE CATCHMENT (NORTH)
- DRAINAGE CATCHMENT (SOUTH)
- EXISTING SURFACE WATER SEWER
- EXISTING FOUL WATER SEWER
- PROPOSED SURFACE WATER SEWER
- ILLUSTRATIVE SEWER EASEMENT
- VORTEX FLOW CONTROL DEVICE

EXISTING SURFACE WATER MANHOLE
 REFERENCE 4174
 CL = 85.18m AOD
 IL = 83.08m AOD
 PROPOSED SURFACE WATER CONNECTION FOR BOTH CATCHMENTS - LEVELS ON-SITE SUGGEST A CONNECTION INTO THE SEWER ON-SITE IS NOT FEASIBLE DUE TO INSUFFICIENT DEPTH TO CROSS THE FOUL NETWORK. SUBJECT TO REQUISITION FROM THE SOUTHERN CATCHMENT.

NORTHERN ATTENUATION
 APPROXIMATE STORAGE VOLUME = 575m³
 APPROXIMATE FOOTPRINT AREA = 1027m²
 INDICATIVE POND DEPTH = 1.0m
 DESIGNED TO ACCOMMODATE 1 IN 100 YEAR +40% CLIMATE CHANGE EVENT.
 PROPOSED RESTRICTED DISCHARGE TO EXISTING SURFACE WATER SEWER @ 6.6l/s.

SOUTHERN ATTENUATION
 APPROXIMATE COMBINED STORAGE VOLUME = 610m³
 APPROXIMATE COMBINED FOOTPRINT AREA = 788m²
 CURRENTLY MODELLED AS ONE VOLUME
 INDICATIVE POND DEPTH = 1.3m
 DESIGNED TO ACCOMMODATE 1 IN 100 YEAR +40% CLIMATE CHANGE EVENT.
 PROPOSED RESTRICTED DISCHARGE TO EXISTING SURFACE WATER SEWER @ 7.0l/s.

ALIGNMENT OF EXISTING SURFACE WATER AND FOUL WATER SEWERS THROUGH SITE EXTENTS.
 ILLUSTRATIVE EASEMENT SHOWN. ASSUMED AS 5m FROM 450mm SURFACE WATER PIPE AND 2.5m FROM 150mm FOUL WATER PIPE, BUT SUBJECT TO CONFIRMATION FROM SEVERN TRENT WATER.



opment

ANAL

CHE TW YND

TEVERAY DRIVE

WALHOUSE DRIVE

BEVERLEY CL

DRAKE

AVENUE

Highbrooke

The Poplars

Farm

Fairfield

DRIVE



4

VISION



4 VISION

VISION

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







Development

E N A L

CHE TW YND

TEVERAY DRIVE

WALHOUSE DRIVE

BEVERLEY

DRAKE AVENUE

Highbrooke

The Poplars

Farm

Fairfield

DRIVE





INDICATIVE MASTERPLAN & DESIGN PRINCIPLES

5.1 The indicative masterplan identifies the following key features:

- Delivery of approximately 90 dwellings, provided at a net density of approximately 37 dwellings per hectare;
- The provision of new Public Open Space with potential for the delivery of a children's play facility, providing a range of habitats including wet and wildflower meadow;
- Green corridors provided throughout the development, encompassing existing hedgerows & field boundaries where possible. The corridors provide for pedestrian permeability within the development;
- Development set back and fronting on to the Staffordshire and Worcestershire Canal to provide a sympathetic frontage reflecting the large housing plots that exist to the east of the canal;
- Incorporation of SuDS using balancing ponds indicated on the low points of the development along Boscomoor Lane (subject to detailed assessment).
- Strengthened planting to southern boundary to create strong and enduring Green Belt boundary.

5.2 In respect of standards, the proposed masterplan provides a network of open space that maximises permeability and provides good connections to nearby services and facilities. The green infrastructure proposed, exceeds the Council's standards set out Policy SAD7 contained within the adopted Local Plan and provides flexibility to ensure all typologies of open space, including children's play can be adequately incorporated.

5.3 In addition, the indicative plan demonstrates how a mix of properties can be delivered to assist in the achievement of a balanced housing market. This includes the provision of smaller dwellings suited to younger people and the provision of bungalows. The delivery of 40% affordable provision has been assumed within the scheme to meet the requirements set out in the adopted Core Strategy.

5.4 It is recognised that there will be a requirement for appropriate financial contributions to be made in respect of the proposal to mitigate impact of development. As part of a balanced development growth strategy for Penkridge, the development could assist in funding strategic infrastructure to meet wider community needs e.g. the provision of a new swimming pool; a project identified within South Staffordshire's Infrastructure Delivery Plan.



LANDSCAPE STRATEGY | NOT TO SCALE

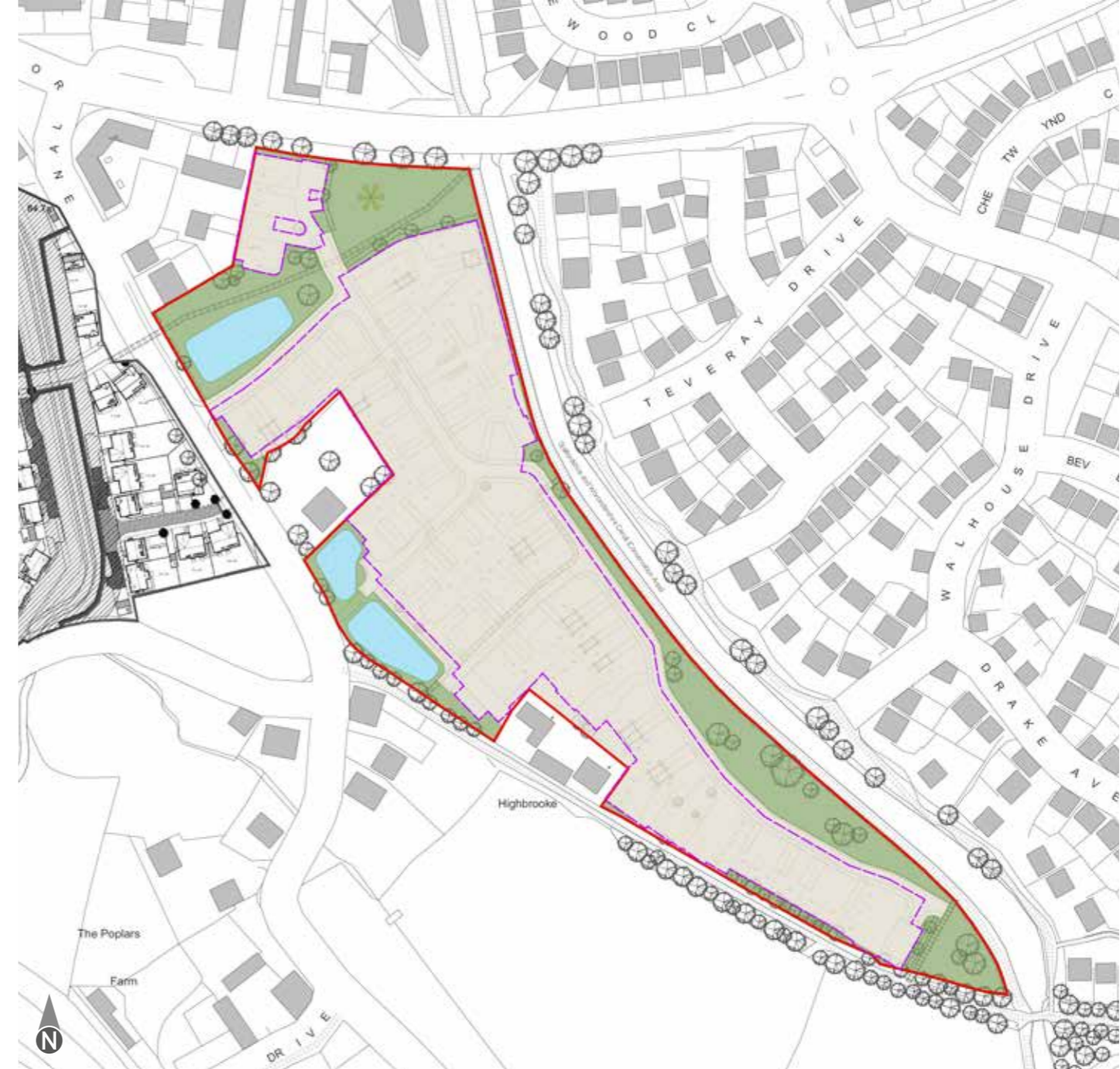


Existing Hedgerow Planting
Proposed Hedgerow Planting
Existing Tree Planting
Proposed Tree Planting
Attenuation Basins
Marginal Planting
Wet Meadow Mix
Wildflower Meadow Mix
Local Equipped Area for Play (LEAP)

Grass Seed Mix
 Suggested Mix
 Emorsgate: EC1 - Standard Comfield Mixture to be planted around play areas and green corridors.

Wet Meadow Mix
 Emorsgate: EM8 - Meadow Mixture For Wetlands to be planted around attenuation basins and flood zone area.

Suggested Play Equipment



USE AND AMOUNT | NOT TO SCALE

Key

- Application site boundary: 3.80ha
- Not developable area: 2.34ha (5.75 acres)
- Developable area: 2.61ha
- POS: 0.99ha
- SUDS: 0.20ha



- Key**
-  Application site boundary
 -  Open space
 -  Indicative surface water attenuation basin
 -  Existing (retained) trees & hedgerow
 -  Indicative proposed planting
 -  Existing Public Rights of Way & towpaths
 -  Proposed footpath links
 -  Potential for children's play area (LAP)
 -  Proposed Market Dwelling
 -  Social Rented Tenure
 -  Shared Ownership Tenure
 -  Potential emergency access

Accommodation Schedule					
House Type	Beds	Total	House		Summary (%)
			SoPt	SoFl	
Allotment					
R101	1	4	455	1,820	4 1%
R203	2	10	635	12,065	19 53%
R305	3	10	892	8,100	10 28%
R405	4	3	1,075	3,225	3 8%
Sub Total		36		26,210	
Market					
R201-B	2	5	700	3,500	5 9%
R202	2	11	620	6,620	11 20%
R301	3	8	980	7,840	
R302	3	8	1,000	8,000	24 44%
R303	3	4	635	3,340	
R304	3	4	1,070	4,280	
R401	4	5	1,080	5,400	
R403	4	3	1,535	4,605	14 26%
R404	4	6	1,290	7,740	
Sub Total		54		51,935	
Total		90		77,735	

ILLUSTRATIVE LAYOUT | NOT TO SCALE



Development

GENERAL

TEVERAY DRIVE

WALHOUSE DRIVE

BEVERLEY CL

DRAKE AVENUE

Highbrooke

The Poplars

Farm

Fairfield

DRIVE





DELIVERABILITY & KEY BENEFITS

DELIVERABILITY

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

AVAILABLE

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

SUITABLE

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

ACHIEVABLE

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

KEY BENEFITS

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



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E N A L

CHE TW YND

T E V E R A Y D R I V E

W A L H O U S E D R I V E

B E V E R L E Y C L

D R A K E

A V E N U E

Highbrooke

The Poplars

Farm

Fairfield

D R I V E





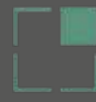
CONCLUSIONS

- 7.1 This Promotional Document demonstrates that there is a need to accommodate an increased level of housing within the District to meet future housing needs and there are exceptional circumstances to justify the need for Green Belt release to accommodate this as part of the Local Plan review.
- 7.2 This site represents a well located and sustainable site, which would deliver approximately 90 new market and affordable dwellings to assist in meeting the future housing requirement of South Staffordshire District without undermining the purposes of the Green Belt or adversely impacting upon the environment.

- 7.3 In summary, this Promotional Document has illustrated that the site would:
- Positively contribute to the identified need for new housing and create a range and mix of housing types that will make a positive contribution to the District's housing requirements;
 - Provide new Public Open Space with potential for the delivery of a children's play facility, providing a range of habitats including wet and wildflower meadow;
 - Deliver green corridors encompassing existing hedgerows & field boundaries where possible. The corridors provide for pedestrian permeability within the development;
 - Be sustainably located in an area of Penkridge bounded on three sides by the existing urban area and within close proximity of a wide range of services and facilities;
 - Provide financial contributions towards strategic infrastructure to support growth within Penkridge e.g. new swimming pool space
 - Accommodate a high-quality residential development with safe, attractive and secure neighbourhood, streets and places which promote social interaction which will afford access and movement priority to pedestrians and cyclists, including connectivity with the existing network of footpaths to local services and facilities;
 - Provide a locally inspired and meaningful new green space network which enhances the character of the site and the natural and historic environment and creates a robust and enduring new Green Belt boundary; and
 - Create a development that will enhance the attraction of Penkridge as a place to live and work, incorporating valued aspects of local character, heritage, landscape, visual amenity and biodiversity.



DESIGN



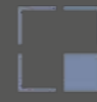
ENVIRONMENT



PLANNING



ECONOMICS



HERITAGE

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