



REPRESENTATION

in respect of
Land at Sandyfields Road, Sedgley
South Staffordshire Draft Local Plan Regulation 19
Consultation

on behalf of
Seven Capital
30 May 2024
Client Reference: 00716d-P
Last User: CJ

QMS

DATE	30/05/2024 14:16:37
FILE LOCATION	C:\Users\ChloeJonczyk\RCA Regeneration\RCA Share - General\Jobs\S - U\Seven Capital (RCA716)\Sandyfields Road, Sedgley (00716d-P)\PRE-SUBMISSION

AUTHOR	CJ
CHECKED BY	SG

VERSION ISSUED TO	<input type="checkbox"/> Client	<input checked="" type="checkbox"/> LPA	<input type="checkbox"/> Other
--------------------------	---------------------------------	---	--------------------------------

VERSION FOR	<input type="checkbox"/> Checking	<input checked="" type="checkbox"/> Submission	<input type="checkbox"/> Client
--------------------	-----------------------------------	--	---------------------------------



CONTENTS

1. INTRODUCTION	4
2. PART A: CONTEXT AND DEVELOPMENT STRATEGY	6
3. PART B: SITE ALLOCATIONS	10
4. PART C: HOMES AND COMMUNITIES.....	11
5. PART D: ECONOMIC PROSPERITY	13
6. PART E: THE NATURAL AND BUILT ENVIRONMENT.....	14
7. THE SITE AND PROPOSALS	15

1. INTRODUCTION

- 1.1. This representation is made by RCA Regeneration Ltd on behalf of Seven Capital, in respect of Land at Sandyfields Road, Sedgley to the latest South Staffordshire Publication Plan 2024 Consultation (Regulation 19), which is running from Thursday April 18th – Friday 31st May 2024.
- 1.2. South Staffordshire Council have progressed their local plan review to another Regulation 19 stage having reached the following previous stages:
 - Issues and Options – 2018
 - Spatial Housing Strategy and Infrastructure Delivery (SHSID) -2019
 - Preferred Options – 2021
 - Publication Plan (Pre-submission) – 2022
- 1.3. The Planning Practice Guidance (PPG) and SEA Directive¹ requires a clear and transparent process of identifying, describing and evaluating reasonable alternatives in both policy and site allocation terms. There is often a direct conflict between the imperative to deliver new homes and enough jobs to support the local economy, whilst continuing to offer sufficient protection to the environment. There is also a soundness and legal compliance element to the preparation and production of SA documents and as such we have considered these as part of our submission.
- 1.4. This representation provides a case for the allocation of the subject site as well as providing a view on some emerging policies.
- 1.5. The timetable for the preparation of the Local Plan is understood to be as follows:
 - Evidence Gathering - 2016
 - Issues and Options - 2018
 - Spatial Housing Strategy & Infrastructure Delivery Consultation – 2019
 - Preferred Options Plan – 2021
 - Publication Plan (i) – 2022
 - Publication Plan (ii) – 2024
 - Submission and Examination – 2025
 - Adoption - 2026
- 1.6. We do not respond to all sections of the Publication Plan Consultation, only those which we currently consider relevant to our clients and/or the sites they are promoting and areas/villages/settlements within which those sites are located.
- 1.7. To reflect the requirements of the consultation process, the following table sets out which paragraphs/page numbers we have commented on, and these are then dealt with, in turn, throughout this document.

Policy	Paragraph	Page
DS1	5.1	24
DS4	5.6	46
SA3	6.19	64

¹ <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

HC1	7.3	74
HC2	7.5	76
HC3	7.9	78
HC4	7.12	80
HC5	7.16	82
HC6	7.18	83-84
HC7	7.20	85
HC10	8.3	91
HC11	8.4	93
HC12	8.9	95
HC13	8.11	97
HC14	9.1	99
HC15	9.3	100
HC17	9.10	103
HC18	9.14	105
HC19	9.18	107
EC1	10.3	109
NB4	12.17	141
NB5	13.3	143
NB6A	13.6	145
NB7	13.24	153-154
NB8	14.4	157

- 1.8. These views are without prejudice to future submissions or hearing statements, which may be made in advance of the Examination.

2. PART A: CONTEXT AND DEVELOPMENT STRATEGY

- 2.1. Part A of the Publication Plan discusses the context and development strategy. Our comments are as follows:

Cross Boundary Issues and Duty to Cooperate

- 2.2. At paragraph 3.6, the publication plan acknowledges the LPA's duty to cooperate with neighbouring authorities on strategic matters that cross administrative boundaries, for issues such as housing delivery.
- 2.3. South Staffordshire Council were originally proposing to take c.4,000 homes as 'unmet need' from the Greater Birmingham, Black Country Housing Market Area (GBBCHMA) or Functional Economic Market Area (FEMA), but this appears to have fallen away, despite there being deep concerns that the need has, if anything, worsened.
- 2.4. Neighbouring Dudley Metropolitan Borough Council (who are currently at the Regulation 18 stage of their draft local plan), propose to accommodate 10,876 dwellings. However, in the Black Country Plan, Dudley MBC were originally accommodating 13,235 dwellings up to 2039². Indeed, Dudley Borough in reducing their housing requirement, still cannot accommodate over 1,000 new homes within their authority boundary but have removed all proposed Green Belt allocations.
- 2.5. The other neighbouring authority Wolverhampton (who have also recently completed a Reg.18 consultation) have also removed their proposed Green Belt allocations resulting in an unmet need figure of 11,998 homes, which will need to be accommodated in neighbouring authorities³.
- 2.6. Given the scale of the unmet need of both Dudley and Wolverhampton, we consider it would be helpful for South Staffordshire Council to immediately publish their thoughts on the approach being taken by these authorities, given the shared boundaries and relationships. We have already made representations to both emerging neighbouring plans and have criticised the perverse approach being taken.
- 2.7. Our question to South Staffordshire is why they have reduced the number of new homes that will be accommodated in the Borough and whether they are now abandoning the Duty to Cooperate.
- 2.8. The approach is now likely to result in the under-delivery of potentially 1000s of additional new homes, simply because Dudley and Wolverhampton have assumed that under the Duty to Cooperate that South Staffordshire (and others) will step-up and meet this need within their own areas.
- 2.9. It is potentially catastrophic that so much housing development will not be delivered in the area, despite there being overwhelming evidence that the need exists. We consider there to be a failure of the Duty to Cooperate not only on the part of South Staffordshire, but its neighbouring Black Country Authorities. This is contrary to the Planning Practice Guidance⁴ which states:

“Local planning authorities should bear in mind that failure to demonstrate compliance with the duty at the Local Plan examination cannot be corrected after the Local Plan has been submitted

² <https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/draft-dudley-local-plan-consultation/>

³ <https://www.wolverhampton.gov.uk/planning/planning-policies/wolverhampton-local-plan>

⁴ Paragraph: 012 Reference ID: 9-012-20140306

for examination. The most likely outcome of a failure to demonstrate compliance will be that the local planning authority will withdraw the Local Plan.”

Vision and Strategic Objectives

- 2.10. We disagree with Strategic Objective 1 in its aim to require “*compensatory improvement to the environmental quality and accessibility of the remaining Green Belt*”. We question how this will be mandated and what level of viability testing has been undertaken to ensure that development is not stymied due to the requirement to make further contributions towards off-site improvements, beyond that of established and impending S106, CIL, Biodiversity Net Gain and Net Zero obligations. In accordance with paragraph 57⁵ of the NPPF, which only requires s106 to be necessary to make development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind.
- 2.11. We agree with Strategic Objective 2 with regards to meeting housing needs of the district whilst making a proportionate contribution towards the unmet needs of Greater Birmingham. It would be helpful to understand what proportion would be assisting Birmingham and what proportion for the Black Country authorities? We have repeatedly asked for this information to be made available in our previous representations.
- 2.12. We agree with Strategic Objective 3 with regards to meeting housing needs for different groups in the community, including a range of market and affordable housing.
- 2.13. We agree with Strategic Objective 4 with regards to developing a high-quality design and character.
- 2.14. We agree with Strategic Objective 5 with regards to encouraging healthy communities through the provision of health, education, open space, sport and leisure infrastructure, acknowledging the positive contribution house building makes to these services via S106 agreements.
- 2.15. We agree with Strategic Objective 6, to foster sustainable economic growth and inward investment, acknowledging the significant growth, employment and tax revenue associated within house building.
- 2.16. We agree with Strategic Objectives 7 & 8, to support rural areas and villages and the community services they depend on. In supporting these objectives, we acknowledge the positive contribution housing growth has to sustaining these communities, maintaining and enhancing demand for services and ensuring the vitality.
- 2.17. We agree with Strategic Objectives 9 & 10, to ensure new development is served by infrastructure and transport networks, particularly for development that grows existing settlements with established transport links, services and infrastructure. However, it is also here that meeting the Duty to Cooperate is essential in identifying and delivering cross-boundary infrastructure which would facilitate unmet housing need from neighbouring authorities.
- 2.18. Strategic Objectives 11 & 12 are laudable and seek to protect and enhance the natural environment and deliver climate change mitigation, whilst acknowledging the positive impact housing development in South Staffordshire can have on these objectives. Mandatory Biodiversity Net Gain will enhance habitats and the natural world, whilst delivering housing growth. Low carbon and energy efficient technology, such as Air and Ground Source Heat Pumps, solar PVs, EV charge points and provisions made within new building regulations will ensure appropriate climate mitigation through the delivery of new homes. It is our view that the building regulations regime

⁵ https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

is the best way to set standards for energy performance in new buildings. We would refer the council to the Ministerial Statement⁶ of 13 December 2023 which sets out that:

“... the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations”.

- 2.19. We agree with Strategic Objective 13 to protect and enhance historic environments across South Staffordshire.

Green Belt

- 2.20. Whilst we acknowledge that South Staffordshire is heavily constrained with regards to the level of Green Belt land across the district (80%), we believe a proactive approach to releasing Green Belt land to meet strategic objectives, such as housing delivery, should be adopted. We are encouraged that “*boundary amendments*” will be made to accord with the development strategy. It is clear that there are exceptional circumstances in place to justify a wholesale review of the Green Belt within the authority, or opportunities to meet burgeoning housing need will be lost. The obvious lack of cooperation with neighbouring authorities on this approach is concerning.
- 2.21. With regards to policy DS1, we agree that Green Belt development should enhance access to outdoor sport and recreation, enhance landscape, visual amenity and biodiversity – as indeed many proposals within the Green Belt are capable of (including the subject site).
- 2.22. We also agree with DS1 that where Very Special Circumstances can be demonstrated with regards to inappropriateness, planning permission should be granted. However, this is a difficult hurdle to get over and the most appropriate way to deliver large scale new housing is through a positively prepared local plan.
- 2.23. We do not agree that affordable housing to meet local community needs should be “limited”, considering the significant and worsening affordable housing shortage within South Staffordshire, as demonstrated by the c.1,500 households on its social housing waiting list. South Staffordshire should look to encourage as many forms of affordable housing delivery as possible, including via Rural Exception Sites.

Green Belt Compensatory Improvements

- 2.24. Despite paragraphs 147 and 148 of the latest NPPF, we disagree that Green Belt proposals must require “*compensatory improvements*” in order to gain planning consent. We instead agree with motion set by paragraph 57 that requires contributions to be necessary to make development acceptable in planning terms, directly related to the development and related in scale and kind. Improvements on adjacent site or sites elsewhere in South Staffordshire would not, in our view meet the tests within paragraph 57, as they are not directly related to the development.
- 2.25. We further question whether these further obligations have been tested within South Staffordshire’s evidence base with regards to financial viability. The cost of these compensatory improvements must be tested against existing assumptions for developer contributions, to ensure financial viability. Without such testing, this requirement cannot fairly be applied to development across an LPA which is mostly Green Belt.

Housing

- 2.26. We are concerned that the previous publication plan had a target delivery of 9,089 homes over the plan period, which has now inexplicably been halved to 4726 dwellings over the plan period up to

⁶ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hlws120>

2041 (just 227 dwellings per annum). This figure takes into account South Staffordshire's own minimum housing need of 4086 dwellings and the additional 640 Dwellings from the unmet needs of the GBBCHMA. The unmet need identified in paragraphs 5.9 to 5.11 attributed to the authorities in the Black Country and Birmingham have as much as 106,653 homes worth of unmet need (78,415 from Birmingham and 28,643 from the Black Country). Wolverhampton and Dudley alone account for over 12,000 homes as unmet need. It appears that South Staffordshire have all but abandoned their previous approach of meeting c4,000 units of this unmet need via the Duty to Cooperate, and since then very little has changed to warrant this new approach.

- 2.27. We would stress that the 4,726 figures should be viewed as a minimum and should not discount opportunities to provide housing on the edge of neighbouring authorities, which benefit from existing services and infrastructure.

Development Needs & Spatial Strategy to 2041

- 2.28. Policy DS4 should make clear that the delivery of 4,726 homes is a minimum target and should encourage sustainable development on all sites where all other development plan policies are met.
- 2.29. We believe that the spatial strategy should allocate potential housing sites on the urban fringes of the Black Country which already benefit from good sustainable transport links and higher order services such as surgeries, schools and shops. There are also significant employment opportunities throughout the Black Country that simply do not exist within the rural areas of South Staffordshire. We believe policy DS5 should encourage strategic development in urban fringe locations to extend existing larger settlements.

3. PART B: SITE ALLOCATIONS

Site Allocations – Housing

- 3.1. The housing allocations at Policy SA3 do not allocate any housing to urban edge sites, which would take advantage of existing services and transport infrastructure of neighbouring Black Country settlements. We do not agree with allocations over reliant on the tiered settlements of South Staffordshire as this completely ignores the fact that the authority is inter-dependent with the Black Country for employment, retail and educational opportunities and that meeting the needs of the Black Country will require the release of some Green Belt land within South Staffordshire: something that was acknowledged in the later iteration of the emerging Black Country Plan and the previous Reg 19 Local Plan for South Staffordshire published in 2022.

4. PART C: HOMES AND COMMUNITIES

- 4.1. We agree with Policy HC1 and the need to deliver a strong housing mix that meets the needs of a variety of different households, regarding bedroom numbers and mix. However, we would urge flexibility in its application where there are clear vagaries in the housing market throughout the authority.
- 4.2. We also agree with Policy HC2, that development should seek to make efficient use of land by achieving a least the minimum density of 35 dwellings per ha, and in many cases should exceed this minimum density, to encourage the delivery of more housing across South Staffordshire. However, this should not be at odds with prevailing character, nor the need to accommodate 10% BNG for instance.
- 4.3. We agree with Policy HC3 that 30% affordable housing should be delivered at the tenure mix as described within the policy. On small sites of less than c.10 units, specific wording should be added to allow a given lower end threshold for on-site affordable housing, below which an off-site payment in lieu may be provided.
- 4.4. We agree with Policy HC4 & HC5 and the need to provide homes for older people and those with special housing requirements. The provision of sheltered living and other specialised accommodation could be provided within new settlement allocations or on strategic development sites.
- 4.5. Policy HC6 is not clear as to how some of the exceptional circumstance criteria would apply. Exception (a) is not clear, as it does not consider a scenario where development is proposed inside the settlement boundary, therefore creating a potential reason for refusal by a policy that seeks to prevent sprawl outside the settlement, and consequently rejects development inside the settlement. This appears contradictory and should clarify its position on proposals inside the settlement.
- 4.6. We completely disagree with requirements to involve the Parish Council and a Rural Housing Enabler for a Rural Exception Site; as is clear from recent cases, if the Parish uphold their right to not engage with a developer, the policy cannot be met. It is true that many affordable housing providers also require the endorsement of the parish, which again, would preclude the ability to meet HC6 if a parish choose not to engage with the applicant, effectively holding the process to ransom. Policy HC6 should remove the unnecessary requirement to involve a parish and a Rural Housing Enabler as it is not in accordance with the NPPF or PPG – the parish council and Rural Housing Enabler are not the planning authority and should not be given the role of decision taker.
- 4.7. We agree with Policy HC7 and the need to make exceptional provision for First Homes across South Staffordshire.
- 4.8. We agree with Policies HC10, HC11, HC12 & HC13, and the need to design visually attractive homes with high quality residential amenity, adequate internal space and correct parking provision. HC13 should however make clear at Appendix H (table 10) that the spaces requirement is a maximum.
- 4.9. We recognise the importance of supporting infrastructure for health (Policy HC14), education (policy HC15), open space (policy HC17), sports facilities and playing pitches (HC18) and green infrastructure (Policy HC19), for development sites. It is true that the provision of housing contributes significantly to such supporting infrastructure via Section 106 agreements and schemes designed with new open space and recreational facilities which are publicly accessible. Reliance on brownfield development is commonly far more limited in its contribution to any form

supporting infrastructure on financial viability grounds or as a result of vacant building credit being applied.

5. PART D: ECONOMIC PROSPERITY

- 5.1. Policy EC1 should recognise the positive economic impacts of housing delivery across the district and make note of the value of investment in local supply chains as well as the creation of short- and long-term employment opportunities, as well as supporting apprenticeships noted in EC3. Local tax revenue associated with more households paying council tax will contribute positively towards funding local services and supporting infrastructure.

6. PART E: THE NATURAL AND BUILT ENVIRONMENT

- 6.1. We agree with the plan's ambition to protect, enhance and maintain the natural environment, recognised within Policies NB1 & NB2. The mandatory requirements of biodiversity net gain means all development sites should make a positive contribution to biodiversity of at least 10%. Housing development should therefore be recognised within the plan as a key contributor to improving the natural environment. There is no such obligation placed on agricultural operations.
- 6.2. We agree with Policy NB4 with regards to landscape character, that distinct landscape features such as trees, woodland, and hedgerows must be protected and maintained.
- 6.3. As previously mentioned, the contribution of housing development to creating renewable and low carbon energy generation should be acknowledged within policy NB5, for the introduction of technologies such as Air and Ground Source Heat Pumps, solar PVs and EV charging. This has been rightly recognised within the requirements set out in Policy NB6A, but we reiterate the point we have already made about the building regulations regime taking a primary role in this.
- 6.4. We agree with policy NB7 with regards to managing flood risk, and sustainable drainage solutions.
- 6.5. We agree that historic assets must be protected and enhanced, as policy NB8 requires.

7. THE SITE AND PROPOSALS

- 7.1. We would firstly like to highlight that we are disappointed that our client's site: Land at Sandyfields Road, Sedgley has not been included as an allocation within the Publication Plan document. We feel that the site should be included in the emerging plan as it would make a valuable contribution towards meeting the district housing target 4,086 homes over the period to 2041, as well as making a contribution to Dudley Metropolitan Borough Council's significant unmet need.
- 7.2. The site itself extends over 6.42 Ha and has a number of separate land parcels bounded by hedgerow and punctuated by some trees. The site is classified as being a part of the urban fringe of Sedgley where there is significant residential development up to its boundary.
- 7.3. We would like to highlight the following points about the site, particularly as the site could deliver around 105 new homes (based on net 35 dph) without the need for major infrastructure investment and without the need to phase delivery. A red line map of the site is included below.



- 7.4. The land at Sandyfields Road has already been subject to previous representations at preferred options, Issues and Options and the Spatial Housing Strategy stages and the previous iteration of the Publication Plan. The site has also been previously promoted in the Dudley Local Plan

Regulation 18 consultation. The site was promoted under reference '567: Green Hill Farm, Sedgley' in the 2021 SHELAA, and it was noted by assessors that the site was 'potentially suitable' for development.

- 7.5. The only restriction that the site received was that if the site were developed, there would be a loss of Green Belt. This would be an obvious constraint of the site; however, it is a constraint which would apply to all other Green Belt sites within the Borough. The Green Belt Review (updated in 2019) acknowledged that the site falls within parcel S71, which was recognised as having strong contribution to restricting urban sprawl and safeguarding the countryside from encroachment. However, the parcel of land had a weak contribution to preventing the merging of towns and preserving the setting of special characters of historic towns.
- 7.6. The SHELAA marked the site as orange and categorised the site as being partially constrained against the Green Belt and Core Policy 1, because the site was '*directly adjacent to the urban form of the Black Country*'.
- 7.7. As part of previous promotional work, the site has been subject to extensive work which is summarised in the Vision Document that was submitted during the previous preferred options consultation. The masterplan submitted within the Vision Document has been included as a reminder in Appendix A.
- 7.8. The redline plan below shows a white solid line which details the small part of the site that falls into the Dudley MBC Authority boundary.



- 7.9. As a result of the above comments, an allocation here would serve as a logical site to deliver unmet housing need arising from neighbouring authorities of Dudley and Wolverhampton who continue to be unable to deliver their own housing need within their boundaries.
- 7.10. The site is also within close distance to former and re-allocated site- 'Land off Himley Lane (REF:313)', under 'Policy SA5: Housing Allocations' within the earlier Reg19 Publication Plan (2018-2039). This site can accommodate up to minimum capacity of 22 dwellings and it borders the Green Belt; but it does not follow the existing built form of Swindon. Therefore, we do not consider this to be a sustainable allocation.
- 7.11. Furthermore, the site is also within a close distance to the former proposed allocations on Land off Billy Buns Lane and Gilbert Lane (references: 463 and 284), which had the combined minimum capacity of 223 dwellings. However, these sites do not appear to feature in the most recent allocations within the appendices to this Publication Plan.
- 7.12. As is clear from the vision document submitted with this representation (and submitted to previous consultation), the site can deliver a good mix of housing in accordance with the density and type prescribed within the proposed policies, whilst delivering green infrastructure (and necessary biodiversity net gain) and areas of sustainable drainage and other public benefits, during the first 5 years of the plan. The site has the capacity to deliver around 105 new homes.
- 7.13. In comparison to many of the allocations proposed within various small villages across South Staffordshire, the site at Sandyfields Road would form a logical and immediate continuation of Dudley, which already is served by existing communal facilities and transportation infrastructure.
- 7.14. Apart from being within the Green belt, the site is considered to be unconstrained. It is within Flood Zone 1 and there are no further landscape or heritage designations associated with the site. there are no PRow running throughout the site.
- 7.15. Below is an extract from the vision document which shows an initial illustrative layout of how the site could be delivered:



7.16. For the reasons highlighted above, we urge the council to cooperate with neighbouring authorities now and we urge the council to consider cross-boundary working on potential housing. We hope that the council gives further consideration to our client's site at Sandyfields Road, and it should be included as a housing allocation within the Submission Plan.

APPENDIX A: VISION DOCUMENT



LAND TO THE WEST OF SANDYFIELDS ROAD

DEVELOPMENT VISION DOCUMENT

JULY 2021



placemaking for life.

This document has been prepared by IDP Architects working in tandem with SevenHomes to design a residential development for the site - Land to the West of Sandyfields Road, Sedgley. The document intends to demonstrate that the site can be released from the Green Belt and contribute towards finding a solution to the current housing shortage.

The following consultant team support SevenHomes in the development of the proposals for the project:

Architecture & Urban
Design:

IDP

Planning Consultants:

**RCA Regeneration
Limited**

Landscape
Architecture:

IDP



Revision	-
Date	JULY 2021
Prepared by	SB
Checked by	BDF

Cover Photo: Site Location - IDP

CONTENTS

5	INTRODUCTION	5	25	VISIONING PRINCIPLES	25
	THE SITE	6		THE VISION: A CONNECTED PLACE	26
	THE VISION	7		MASTERPLAN	27
	SEVENHOMES	8		LANDSCAPE FRAMEWORK	28
11	APPRECIATING THE CONTEXT	11		SKETCH PERSPECTIVES	30
	INTRODUCTION	12	33	SUMMARY	33
	PLANNING POLICY CONTEXT	13			
	CHARACTER APPRAISAL	16			
	LANDSCAPE CONTEXT	18			
	LOCAL AMENITIES	20			
	ACCESS & TRANSPORTATION	21			
	DRAINAGE & FLOODING	22			
	CONSTRAINTS PLAN	23			



INTRODUCTION

“ This Vision Document has been prepared on behalf of SevenHomes to set out the opportunities for potential development of the Land to the West of Sandyfields Road. ”



INTRODUCTION

The Site

The proposed development site occupies land to the north-west of Sandyfields Road, in the town of Sedgley, which in turn forms a key town within the wider Dudley Metropolitan Borough.

The site is formed of ten pasture / paddock fields defined by hedgerow field boundaries and is loosely scattered with trees of varying size and maturity.

The site forms adjacency to an existing housing development along the full extent of the western edge, whilst also abutting Sandyfields Road in the south. To the west of the site further farm land occupies the adjacent valley. The site bridges a highpoint ridge in the existing terrain which progresses from north to south. To the west of the ridge the land falls away into the valley, whilst in the east, the paddocks fall less more modestly towards the existing settlement.



Regional Location Plan



Site Boundary

The Vision

To create a sustainable and high quality living environment that compliments and connects with the existing town, fostering a sense of well-being encouraged by the enhancement of existing landscape features.

The design will build upon the existing rural village character, reinforcing the established pattern of buildings and using locally inspired materials to form a development that enhances the town both visually and through community enrichment.

The sensitive design approach will incorporate modest density homes, ensuring the pattern of development fits in with the existing town form.

The proposals seek to form a landscaped 'green spine' corridor to the west of the site, embellished with opportunities to play and relax to the east.

This green space will form pedestrian and cycle only connection, separating existing residents to use a safe, attractive and health-promoting route to the town centre amenities.

The ethos of the design and development process will centre upon sustainable living principles, promoting healthy lifestyle choices and bringing people come together.



“To create a sensitively designed place that brings the village together through a rich and connected landscape for leisure and play”

SEVEN HOMES

WHAT WE DO

SevenHomes is part of SevenCapital, a diverse property company with a high quality team who boast expertise in the residential market, city conversions, hospitality and commercial real estate. Established in 2017, SevenHomes was created to focus on regional housebuilding creating high quality places to live for modern families and first time buyers.

WHY WE DO IT

At SevenHomes we believe in a happier, healthier society based on values of sustainability, diversity and social cohesion. Our mission is to build homes that contribute towards the brighter, greener and happier communities of tomorrow, by delivering exceptional homes for all of society's housing needs. With a Head Office in Birmingham, SevenHomes is a regional housebuilder focused on creating high-quality homes for families and first-time buyers.

We are proudly part of the SevenCapital Group, which has an unrivalled track record of delivering modern residential homes and mixed-use developments across the UK. As urban regeneration specialists, we are well known for taking complex sites and turning them into developments that breathe life back into the surrounding communities.

Creating diverse and attractive places for people to live, work, and importantly for communities to thrive, is the key driver behind all our homes. As a responsible developer, we are committed to engaging with residents and groups to ensure we give back to the local community, enabling us to understand their needs whilst also informing our planning and design process. Throughout the planning process, we always seek to consult key local stakeholders to ensure all possible avenues of sustainable design and development are explored.

As a Group, sustainability is the fundamental cornerstone of our development philosophy, which is why we are making considerable commitments to lowering energy and carbon consumption with efficient building design. We pledge to work with local authorities to implement eco-friendly initiatives whilst taking an active role to ensure resources and waste are managed efficiently.

Where viable, we also make sure that materials and labour are sourced locally throughout the construction period, and always maintain a high standard of building certification in accordance with Minimum Energy Efficiency Standards (MEES).

At SevenHomes, we understand that each site has its own unique set of characteristics and challenges. Our highly skilled in-house team assess each opportunity against the latest national and local development guidelines. This highly professional and efficient process has helped the Group deliver more than 6,750 homes over the past 10 years, as we continue to provide the utmost confidence in SevenHomes' ability to deliver.



Seven Homes | Mixed Development Homes



Seven Homes | St Georges Townhouses

"Passionate about design, sustainability and quality of construction, SevenHomes has the skills and experience to create the perfect forever home. By combining the latest interior design trends with practical modern day living, we can turn your house into your home."



Above: Interiors of St Georges Townhouse Development, Below: Homes at Oaklands



APPRECIATING THE CONTEXT

“ ‘Places’ are dynamic, rich and full of life. We have sought to understand the town of Dudley through study of its physical characteristics, to ensure the new and the existing can work in harmony.

”



APPRECIATING THE CONTEXT

Introduction

The site crosses the administrative boundaries of two local authorities: South Staffordshire District Council (DC) and Dudley Metropolitan Borough Council (MBC). The access road and access junction fall within Dudley MBC and the remainder of the site falls within South Staffordshire DC.

We have considered the site-specific policy constraints which are limited, but include

- The presence of ecological constraints on the edge of the site and Baggeridge Country Park, which is a designated Local Nature Reserve to the west.
- Some locally listed buildings fronting Sandyfields Road, reflecting the sporadic development of modest workers cottages associated with the more industrial neighbouring Dudley Borough.
- Beyond this is Himley Hall, a Grade II Registered Park and Garden, is located approximately 400m to the south-west of the site. Himley Hall itself is a Grade II* Listed Building and is located approximately 1.5km to the south-west of the site.

The subject site falls entirely within the West Midlands Green Belt and would require removal through the development plan process.

To that end, we are aware of the stages that each authority has reached in the reviews of their development plans and have summarised below.

Planning Policy

Both the emerging South Staffordshire Local Plan and emerging Black Country Plan specifically deal with 'indigenous' housing growth needs as well as the housing growth that is set out in the Greater Birmingham Housing Market Area Strategic Growth Study (February 2018), of which Dudley Borough and South Staffordshire form part.

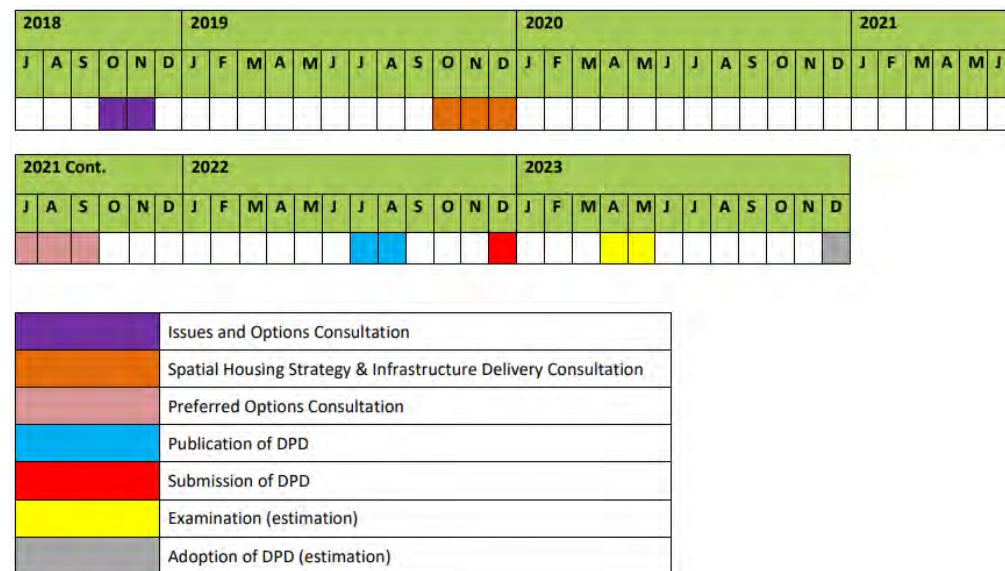
There remains significant further unmet need in the Black Country, as well as Birmingham.

It is likely that South Staffordshire will accommodate around 4,000 dwellings, counted as unmet need from outside of its administrative area, coupled with (as yet unknown) additional housing growth emanating from the revisions to the Planning White Paper (and standard methodology) which is likely to be more focussed on urban areas.

Additionally, according to the Black Country and South Staffordshire Strategic Housing Market Assessment (SHMA), in order to meet the Black Country Authorities' housing needs, approximately 3,824 new dwellings will need to be constructed per annum (taking account of SNHS adjustment) in order to meet local housing needs.

Both the Black Country Authorities and South Staffordshire have, over time, aligned their plan preparation timetables. South Staffordshire's Local Plan programme anticipates the preferred options consultation to take place

between July and September 2021, with the publication version available for consultation in July and August 2022 with submission to the Secretary of State in December 2022. A copy of the consultation timetable is set out below:



APPRECIATING THE CONTEXT

In terms of the Black Country Plan's revised timetable, they currently anticipate consultation on the Draft Plan (Regulation 18 consultation) in August and September 2021 with consultation on the pre-submission draft plan in August and September 2022 with submission to the Secretary of State in March 2023.

A copy of the timetable is set out in the table below.

We have taken into account a number of evidence base documents in the preparation of this Vision Document. These include the Strategic Flood Risk Assessment, Green Belt Assessment and Landscape Sensitivity Assessment, Site Assessment Methodology Summary, Utilities Capacity Study, Ecological Study and the Black Country Urban Capacity Study Update. Below details how these assessments reinforce the potential for this site to be released from the Green Belt, having regard to its overall sustainability.

Strategic Flood Risk Assessment

It can be clearly seen from the Dudley Flood Map, as part of the Black Country Strategic Flood Risk Assessment (SFRA), which has been carried out in accordance with the PPS 25 'Development and Flood Risk' guidance, that the subject site does not form part of a 'low', medium' or 'high' flood risk zone. Therefore, there are no flood-related reasons why the site should not be released from the Green Belt.

Landscape Sensitivity Assessment

In the Black Country Landscape Sensitivity Assessment, which is a strategic-level study that considers the landscape and visual sensitivity of specific areas around Dudley and the Black Country, figure 3.3 highlights the subject site in the landscape area SL16. It outlines the site as currently part of the Greenbelt but not as a 'potential SINC addition' (Site of Importance for Nature Conservation)

or as an 'Absolute Constraint'. From this, there appears no landscape reason why the site should remain in the Green Belt.

Utilities Capacity Study

The Utilities Infrastructure Capacity Study prepared by Peter Brett outlines the Black Country Authorities' capacity of existing electricity, gas and telecommunications infrastructure to support future housing and employment grown within the new plan period. With the move away from gas and an increase in electricity requirements for both heating and powering cars, it concludes that, overall, the Black Country electricity network has spare capacity and that, both Western Power Distribution (WPD) and Cadent, the electricity and gas providers (respectively) within the region, would deliver the required infrastructure to support growth as part of their future asset plants. There is therefore utilities capacity and additional capacity could be delivered to support large scale growth.

Black Country Urban Capacity Study Update

The Black Country Urban Capacity Review Update (May 2021) has found that the gap between supply and need over the new Black Country Plan period up to 2039 has growth to 36,819 homes, an increase of around 10,000 homes since 2019. The release of the site from the Greenbelt would, in light

of other supporting evidence, assist the council in meeting this growing delivery requirement for homes.

It is acknowledged that in order to realise the planned growth strategy of the Black Country authorities and South Staffordshire that land will be required to be released from the Green Belt.

Green Belt Assessment

Two Green Belt Reviews have been published for the Black Country and South Staffordshire, both undertaken by LUC and undertaken in parallel to the same methodology.

The South Staffordshire Green Belt Study (SSGBS) was published as a two-stage review in July 2019 to inform the Spatial Housing Strategy and Infrastructure Delivery Consultation - which represented the second stage of the Local Plan Review. For the Black Country, the Green Belt Study (BCGBS) (also a two-stage review) was published in September 2019, a little after the South Staffs report. It provides a detailed picture of individual areas of Green Belt as part of the evidence needed to support the emerging Black Country Plan.

Planned Stage	Date
Consultation on Draft Plan (Reg. 18)	August - September 2021
Consultation on the Draft Pre-submission Plan (Reg. 19)	August - September 2022
Submission of Plan to Secretary of State for Examination	March 2023
Examination in Public	April 2023 - March 2024
Adoption	April 2024

The timetable for the Black Country Plan (formerly the Black Country Core Strategy) was revised in July 2020.

APPRECIATING THE CONTEXT

In both cases, the studies provide the following evidence:

- It rates areas within the Green Belt as to how they contribute to the five nationally defined purposes of Green Belt.
- It excludes areas of Green Belt which have significant planning constraints on them from further assessment (i.e. land at a high risk of flooding or Sites of Importance for Nature Conservation).
- It rates the remaining areas of Green Belt against the harm which would be caused by their removal from the Green Belt to the integrity of the remaining Green Belt.
- It assesses how far the landscape character of each of those Green Belt areas (e.g. their landform, historic value and use for recreation) would be sensitive to development.

Both studies do not seek to recommend which areas of land should be removed from the Green Belt; amend the Green Belt boundary; state which part of the Green Belt should be developed; or allocate land for new development.

The Green Belt review concludes that the subject site forms part of Greenbelt area S71 and outlines its impact on the four key purposes of the Greenbelt:

- **Purpose 1** - Checking Unrestricted Sprawl: Strong Impact
- **Purpose 2** - Preventing Merging Towns: Weak/ No Contribution
- **Purpose 3** - Safeguarding Countryside from Encroachment: Strong
- **Purpose 4** - Preserving setting and special character of historic towns: Weak/ No Contribution

The two studies conclude on the subject site as follows:

South Staffordshire Green Belt Study (SSGBS)

Here, the subject site forms part of Area S71. We note this is an enormous land parcel running from Gospel End to Wall Heath - clearly there are differences in the performance of smaller elements of this parcel. However, despite its size this parcel is considered as a whole in stage 1 of the SSGBS, and this would include the subject site.

Here, the Green Belt is noted to have a strong impact on the checking of unrestricted urban sprawl (Purpose 1 on

the Greenbelt); however the site directly abuts the settlement boundary to the east and forms a natural extension on the settlement westwards, whilst respecting the surrounding sites landscape features such as the Cotwall End Local Nature Reserve. This applies to the land parcels running along the entire boundary with Dudley Borough - every single land parcel sharing a boundary with the Borough performs in the same way.

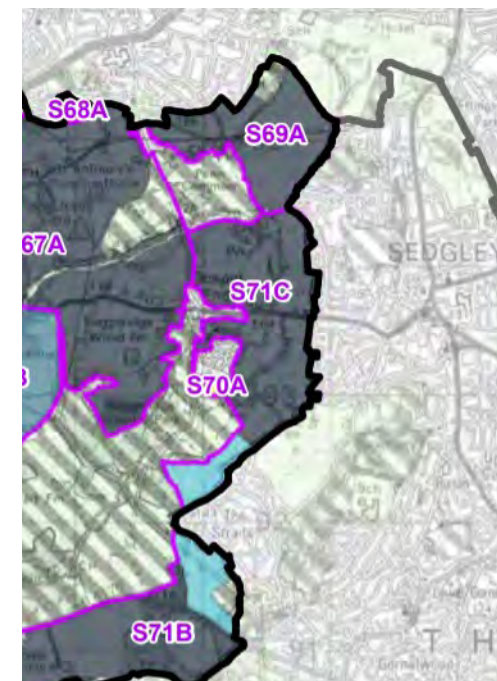
S71 is noted as having weak impact and provides no contribution to the preventing of settlements merging. The site would not result in settlement coalescence. However, this is not the case for all land parcels on the boundary of the Black Country authorities.

The review notes S71 as having a strong impact on safeguarding countryside and encroachment. It is true that S71 forms a direct buffer between Dudley and somewhat open countryside, however the subject site itself forms a minor part of S71 and is the part that is of most logical extension from the existing settlement. Development of this site would be adjacent to existing residential development and have established access from Gospel End Road to the North and Sandyfields Road to South.

S71's impact on purpose 4 of the Green Belt, the preservation of the special character of historic towns, is noted at

weak/ no contribution in the review. The site itself is of no specific historic or landscape interest and the benefits of its release from the Green Belt would significantly outweigh its current use.

The study, at stage 2 subdivides the larger parcel into a smaller sub-set and the subject site falls into S71C (page 85 of the SSGBS). The overall harm rating for S71C (like most parcels abutting the boundary of Dudley Borough) are considered to be 'Very High':



Overall, the SSGBS concludes that S71C makes a Moderate-High or very High contribution to the purposes of Green Belt and this is shown on the extract below:

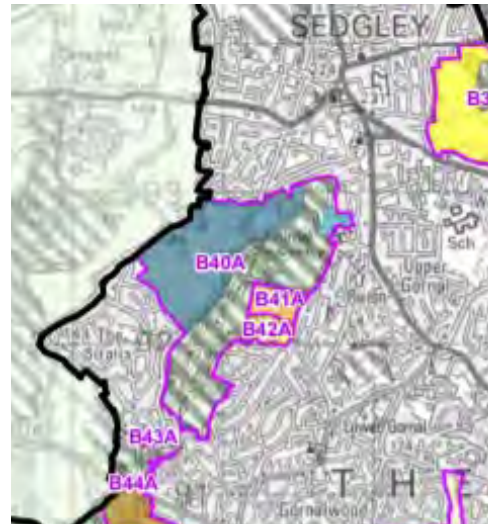
S71As1	112.6	Very High
S71As2	37.2	High
S71Bs1	109.6	Very High
S71Bs2	27.7	Moderate - High
S71Cs1	125.4	Very High
S71Cs2	16.4	Moderate - High

Black Country Green Belt Study (BCGBS)

The BCGBS does not directly assess the subject site as a whole as it falls predominantly into South Staffordshire. The very small area that falls into Dudley Borough is included as land parcel B40 (which largely contains the land to the South of Sandyfields Road).

The overall stage 2 harm rating for parcel B40 is shown on the map extract to the right (page 100 of the BCGBS).

This is assessed overall as follows in the table below:



B40As1	Dudley	50.2	High
B40As2	Dudley	2.5	Moderate - High

The findings overall appear to be somewhat myopic, insofar as the assessment does not realistically appear to have been undertaken against a backdrop of the burgeoning housing growth requirements of the Black Country, and the associated need for South Staffordshire to accommodate some of this requirement.

Neither review is therefore 'calibrated' as such, as much of the edge of the urban area is considered to perform well in relation to preventing settlement coalescence. Development to meet the growth needs of the Black Country has to go somewhere: in light of South Staffordshire having its own growth needs to accommodate, this surely points to a release of sustainable sites on the edge of the Black Country Boroughs from the Green Belt.

We note that some land parcels further away from the urban edge perform less well in Green Belt terms but they are clearly far less sustainable and would result in isolated pockets of development in open countryside that would be harmful in landscape and overall sustainability terms - notwithstanding any site-specific

constraints they may have.

It is noted that at para 7.10 of the BCGBS, LUC state that:

'...it may be that the most sustainable locations for development will result in very high harm to the Green Belt.'

We would therefore urge a more comprehensive overview of all constraints (and not just Green Belt) to be considered holistically, as we strongly believe that this site represents a good opportunity to release a modest area of Green Belt land in a highly sustainable and unconstrained location - where the benefits would clearly and substantially outweigh any harm.

This Vision Document seeks to provide multiple 'overlays' of the site constraints and opportunities, to demonstrate how it would positively contribute to the growth needs of Dudley, whilst maintaining a clearly defined, robust, permanent and enduring edge to the build form.

APPRECIATING THE CONTEXT

Character Appraisal

The following pages illustrate key urban approaches and architectural features within the town, with examples of established architecture, alongside modern interpretations of traditional styles.

The google aerial view of the development sitting adjacent to the site is an example of mid 20th century development which is very orthogonal in its approach. The building lines are often very regulated and complimented by the use of on plot parking in the form of integral and frontage parking, used to create a 'less' car-dominated streetscene.



The development below displays a fairly conventional high-density settlement pattern akin to Victorian housing, with architectural forms consisting of uniform building lines with on street parking. Later additions of housing punctuate the streetscene with differing line setbacks to accommodate on plot parking.



The below development illustrates a late 20th century urban approach where all residential roads are served off a central spine road into the development. All tributary roads are cul-de-sacs terminated by a turning head or parking area. The development consists of a varied range of housing typologies (terraced, semi-detached units) which utilise varied parking arrangements.



Facing Materials

Natural stone
Reconstituted stone
White / Cream render
Weatherboarding
Tile-hanging



Roofscape

Hipped roof
Gable frontage
Chimneys
Dormers



Openings

Protruded entrance
Contemporary window openings
Bay windows
Dormers
Sash windows



Boundary Treatments

Natural stone wall
Vegetation
Low brick walls
Closeboard fencing with posts



GREENBELT ASSESSMENT REVIEW

Within the NPPF the purpose of Greenbelt land is defined by five principles. These are as follows:

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

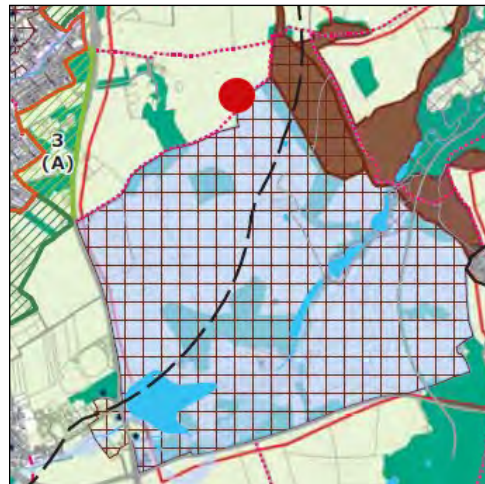
The Site falls within two administrative areas that have both independently carried out their own Greenbelt Assessment. The Black Country Green Belt Assessment, 2019 places the Site directly adjacent to Parcel no. B40 currently in recreational use as the Mark Butler Gold Academy. Furthermore, The Black Country report finds that the release of Parcel B40 would result in at worst a 'High' harm rating on the basis that "Where land makes a strong contribution to one of the Green Belt purposes, and where it's release would partially weaken adjacent Green Belt (for example by increasing its containment by urban areas), harm is likely to be high". Although the Site is part of Greenbelt land under the stewardship of South Staffordshire Council, no reference is made to it within the latest, all be it 'partial' review completed in 2014. The closest area of Greenbelt covered by the

2014 Staffordshire review is Wombourne, to the immediate west of the Site, beyond the Himley Estate.

NPPF Paragraph 89 states that in combination with other measures, but where necessary to release Greenbelt the following compensatory improvements should be included in any development:

- new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);

Extract from Wombourne Greenbelt Review below. Red dot is the approximate Site location.



- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.

The proposed Sandyfields Road Site landscape design will consider all of the above.



LANDSCAPE & VISUAL CONTEXT

The Site is located approximately 1.5km south west of the village centre of Sedgley which is a suburb 4.8km due south of the larger conurbation of Wolverhampton in the West Midlands.

The Site is formed of an amalgamation of ten small and medium sized, steeply sloping, open and planned, rectilinear, semi-improved grassed fields bounded by fragmented, mature trees and native hedgerows subdivided by agricultural fencing and gates.

The Sites south eastern boundary is clearly defined by Sandyfields Road upon which there are several gated and walled, locally listed residential properties, along with Greenhill Farm and the Shakespeare 4x4 service/sales centre. These buildings share the boundary with a mature and continuous native hedgerow that effectively screens the Site from view along this elevation.

The Site spans the southern side of a narrow and steeply sided valley, the highest point of which is 195m AOD and the lowest 175m AOD. The Sites topography falls quickly from the top of the valley, some 20m south east to north west, over an approximate distance of 330m. The Sites topography is made up by several small to medium scale, semi-improved grassed fields bounded by quite typical and regular but fragmented native, mature hedgerows punctuated by mature broadleaved trees.

There are currently no dwellings within the boundary and no visible infrastructure or structures to speak of other than the presence of disused livestock shelters, water troughs and agricultural fencing. Current access is private for pedestrians only and via fieldgate from the rear of no. 190 Sandyfield's Road, Greenfield Farm/Shakespeare 4x4 forecourt.

Key Sensitivities:

- A number of tall, mature broadleaved trees established as sentinels or within the hedged field boundaries are visually prominent locally and of ecological value and therefore sensitive. These should be retained, protected and incorporated as natural assets to the scheme.
- Field boundaries within and on the perimeter of the Site are made up of mature, all be it sometimes fragmented native hedgerows. These are also visually prominent locally and of high ecological value and therefore sensitive. These should also be retained, protected enhanced and incorporated as natural assets to the scheme. The hedgerow along Sandyfields Road is of particular important as it effectively screens the Site from adjacent housing, pedestrians and drivers between the junction of Ruskin Road and Dingle View. Removal to enable

access should be kept to a minimum.

- Views exist from surrounding PRoW Wombourne 16, Wombourne 8 and Himley Se5 although the first two are from some distance. There are no PRoW on or immediately adjacent to the Site. Although sensitive, the distance, intervening landform and features such as mature blocks of plantation woodland reduce this sensitivity. The Sites design should however, be aware of and take account of any visual impact on pedestrians traversing these routes.
- Existing residents living on the western edge of Sedgley, including the locally listed dwellings 108-120 Sandyfields Road, Greenhill Farm and Shakespeare 4x4 as well Wood Hall Farm Barns, Riding School and Kennels and the relatively new housing development and nursing home across the valley to the north east of Baggeridge Country Park accessed from Birkin Kiln Way will have sight of the development. This

should be mitigated where possible.

- The Black Country Landscape Sensitivity Assessment, 2019 summarises Dudley's landscape sensitivity within proximity of the Site as "Pockets of open land that remain outside Greenbelt (and therefore not covered by the same statutory designation) are considered to have moderate-high or moderate sensitivity and derive their sensitivity from their importance as public open space or their strong contribution as a green setting to the surrounding settlements. Areas of lower sensitivity within Dudley include areas on the northern settlement edge which provide little contribution as a backdrop to the surrounding settlement and are visually enclosed with few naturalistic qualities".

View looking north west from within the



LANDSCAPE & VISUAL CONTEXT

The character of the landscape in which the Site is part of is recorded at both a national and local level.

At a national level the Site is classified as and part of Natural England's National Character Area profile (NCA) 67 'Cannock Chase and Cank Wood' covering 72,790ha. NCA 67's landscape character is summarised as follows:

- Cannock Chase and Cank Wood National Character Area (NCA) extends north of Birmingham and the Black Country conurbation. It is situated on higher land consisting of sandstone and the South Staffordshire Coalfield. The NCA principally coincides with the historical hunting forest of Cannock Chase, with major remnants surviving within the Cannock Chase Area of Outstanding Natural Beauty (AONB).
- Canals are a significant feature.
- The NCA has some outstanding geodiversity interest, extensive industrial archaeology and a good number of historic parks.
- In addition to food and timber production, the NCA houses an extensive rights of way network and areas of open access land.
- Change as a result of development has been significant. This has provided opportunities for enhancing both the landscape quality, biodiversity value and through green infrastructure initiatives.

Key characteristics of the NCA are:

- A varied landscape ranging from the open heathlands and plantations through towns, reclaimed mining sites and new developments, to dense urban areas.
- Away from the unenclosed landscape of

Cannock Chase, fields generally have a regular pattern and are frequently enclosed by mature hedgerows with some hedgerow trees. Here farming is generally mixed with arable cultivation in large fields.

- Heathland and associated acid grassland were once much more extensive, although significant tracts still remain. Post-industrial sites and remnant countryside within the urban areas provide a mosaic of additional valuable habitats.
- Streams and small rivers such as the Sow, Penk, Stour and Tame drain radially from the higher ground.
- Post industrial archaeology is a characteristic feature.
- The predominant building material of the 19th- and early 20th-century buildings is red brick, with more modern structures within the urban areas.
- The settlement pattern is complex and contrasting, with some areas densely populated and others relatively sparse. The conurbation includes a mosaic of urban areas, former industrial land and patches of farmland, with an extensive urban fringe.
- Major roads include the M6, the M6 Toll and the A5.
- 940ha of ancient woodland and extensive coniferous plantations interspersed with pockets of sessile oak and birch, with alder on the damper soils and beech along the edges of roads and forestry compartments. Historic parks such as Shugborough and Himley contain significant areas of woodland and veteran trees. Urban areas are characterised by many small woodlands.
- Internationally important heathland habitats are found on Cannock Chase, at Chasewater and Sutton Park. The remaining

areas of heathland and acid grassland are floristically distinct from the heathlands of southern England. The complex range of habitats supports a wide range of species which include nationally rare hybrid bilberry and nationally rare birds such as nightjar and woodlark and a rich and important invertebrate community. Remnants of ancient habitats persist, such as species-rich marshy grassland, ancient woodland and heathland.

At a more local level the Site is classified and

Himley Hall and Gardens west of the Site



part of the large (Approximately 40 km² Black Country Character Area (BCA) DY05 : Dudley North.

Key characteristics of BCA DY05 are defined as:

- The eastern part of the Metropolitan Borough of Dudley is situated on a high ridge approximately 175m OD. The landscape slopes steeply down from the ridge east to Coseley and west to the Pensnett Plateau. The plateau subsequently descends to the

LANDSCAPE & VISUAL CONTEXT

low-lying sandstone geology in the west and also to the Stour Valley itself, which is situated largely below 125m OD (DMBC 2016).

- BCA DY05 has a bedrock geology of Mudstone, Siltstone and Sandstone. This is mixed with Brick Clay and Deep Coal seams 50-200m below ground.
- Opposite the Site Cotwall End Area of High Historic Landscape Value (AHHLV 37) and Greenbelt and south west of AHHLV 21 Former Sedgley Park. These are shown in Figure 79 and 106 Historic Environment Area Designations overleaf.
- Within the locality but not directly impacted there are SSSI at Turners Hill, Gospel End Road and Wrens Nest. Ancient and Semi-Natural Woodlands at Park Coppice, Ashers Coppice, Alder Coppice, Ladywell Wood, Baggeridge Woods (part of Baggeridge Country Park), Turners Hill Wood, The Dingle and Sedgley Coppice. Ancient Replanted Woodland exist within Himley Hall Parks and Garden.
- Scheduled Ancient Monuments (SAM) such as St Bartholomew's Churchyard Cross, Lady Godiva's Churchyard Cross in St Bartholomew's Churchyard, Lime Working remains in Dudley and Medieval settlement at Cooper's Bank Farm.
- Traditional Orchards east of Penn Road in Gospel End.
- Lowland Meadow east of High Arcal Cottage.
- Lowland Heathland in Baggeridge Country Park.
- Listed buildings of note close to the Site are Cottages No. 108-120 and 147 on Sandyfields Road. The Grade 11* listed Church of All Saints, Wodehouse and Coach

house and stable block, Wodehouse Farm and Mill, Lloyd House, Penn Hall, Holbeache House and Himley Hall its Ice House, Bridge, Lodge, Gates and Walls.

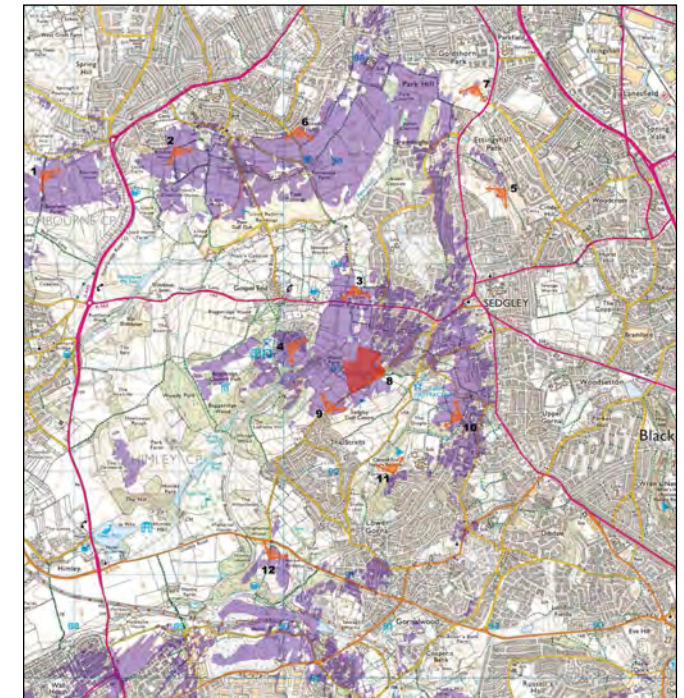
In order to appraise the schemes visual context a Landscape and Visual Appraisal (LVA) was undertaken in early 2021. Of the 15 number representative viewpoints identified using a combination of desk based assessment and a Zone of Theoretical Visibility (ZTV), only 4 had notable views of the land parcel.

Key views are as follows:

- **Viewpoint 1** looking south east towards the Site from PRoW Wombourne 16 where Sedgley's high ground and the Sites open field structure bounded by hedgerows can be seen beyond arable fields in the foreground and the edge of the leafy Wolverhampton suburb of Penn.
- **Viewpoint 2** taken from the much elevated Vicarage Road PRoW Wombourne 8 just south of the Penn village where once again Sedgley's high ridge and the Sites open field structure bounded by linear hedgerows on the horizon can be seen beyond pasture land in the foreground and the top of Baggeridge Country Park in the valley below.
- **Viewpoint 3** much closer to the Site is taken from just north of Gospel End Road along Himley Se5, PRoW as it leaves Red Lane. Here intermittent views of the Site on the horizon are present between breaks in vegetation while walking east until eventually the edge of Sedgley's conurbation block them completely.
- **Viewpoint 4** shows that the Site is just

perceptible from the Chalmers Road housing development sited across the narrow valley. Even though quite elevated, immature screening planted does a good job to block the view in the fore and middle ground with only the top of the adjacent ridge visible on the horizon. As vegetation matures this screening effect is likely to extend to taller buildings such as the nursing home and upper floor windows.

LVA Viewpoint Location Plan



LANDSCAPE & VISUAL CONTEXT



Viewpoint 1 - PRoW off Bearnett Lane FP Wombourne 16. View looking South East towards the Site.



Viewpoint 2 - PRoW off Vicarage Road. FP Wombourne 8. View looking South East towards the Site.

LANDSCAPE & VISUAL CONTEXT



Viewpoint 3 - PRoW off Red Lane. FP Himley Se.5. View looking South towards the Site.



Viewpoint 4 - Chalmers Road. View looking East towards the Site.

LANDSCAPE & VISUAL CONTEXT



Viewpoint 13 - Within the Site. View looking West towards Baggeridge Country Park.



Viewpoint 14 - within the Site. View looking North towards Gospel End Road with Sedgley to the right.

APPRECIATING THE CONTEXT

Local Amenities

The proposed site sits in close proximity to a wide range of public services and facilities. Cotwall End Primary school and St Chads Catholic primary school are within 1km walking distance. The town centre of Sedgley is approximately 1.5km to the north-east of the site and hosts a wide range of amenities including: public houses; restaurants, supermarkets and retail stores.

KEY

— Site Boundary

Education:

- 1 Cotwall End Primary School (1 min drive/ 13 min walk)
- 2 St Chad's Catholic Primary School (3 min drive/ 20 min walk)
- 3 Ellowes Hall Sports College (7 min drive/ 40 min walk)
- 4 Queen Victoria Primary School
- 5 The Dormston School

Healthcare:

- 1 The Ridgeway Doctors Surgery (5 min drive/20 min walk)
- 2 Woodsetton Medical Centre (7 min drive/40 min walk)
- 3 Northway Medical Centre (5 min drive/25 min walk)
- 4 Bath Street Medical Centre (6 min drive/ 30 min walk)
- 5 Highview Dental Practice (5 min drive/22 min walk)

Parks/ Public Open Space

- 1 Cotwall End Local Nature Reserve
- 2 Baggeridge Country Park
- 3 Butlers Bench Park
- 4 Woody Park
- 5 Sedgley Hall Farm Park
- 6 Alder Coppice Woods
- 7 Himley Hall (Grade II Listed) & Park (off map)

Public Services/ Recreation/ Other:

- 1 Sedgley Library
- 2 The Mark Butler Golf Academy



- 3 Brockwood Animal Sanctuary
 - 4 Wood Farm Kennels
 - 5 Wood Farm Riding School
- Bus Services:
- 27A Wolverhampton - Dudley (via Sedgley)
 - - - 1 Tettenhall Wood - Dudley (via Wolverhampton)
 - Approx 10 minute walk radius
 - Approx 20 minutes walk radius

Access & Transportation

The site benefits from close proximity to frequent bus services (27 and 27A) which cover routes from Wolverhampton to Dudley via Sedgley, enabling sustainable travel choices throughout the wider Dudley borough and beyond.

Primary vehicular access is proposed to be formed directly from Sandyfields Road towards the SW corner of the site. This location benefits from a position on the outside of the gentle bend in the existing highway, enabling clear vision splays to be formed in both directions. The visibility splays would be for the speed of the road. A speed survey has been carried out and thus the visibility splays have been set out accordingly.

Further (as shown on the constraints plan overleaf), the site benefits from a further access point to the eastern extent of the site. This narrower route enables pedestrian /cycle /emergency links to be formed, providing a direct route into the existing settlement fabric.



Drainage & Flooding






The site falls outside any defined flood zones as defined by the Environment Agency.

The management of storm water on site will be informed primarily by the sloping topography. Site terrain forms a ridge through the centre of the site, and as such a SuDs system will take advantage of this to provide on site balancing measures such as basins and swales to provide appropriate storage.

The strategy would incorporate the use of a riser main within the primary street route, to enable both storm and foul drainage to be pumped to an outfall of existing sewers within Sandyfields Road.

Alternatively, a further connection may be used via the eastern pedestrian cycle access point, again to outfall both foul and storm water into the existing sewer network.

KEY





-  Riser Main
-  Potential Secondary Drainage Main
-  Ridge
-  Balancing Basins
-  Direction of Topographical Fall



Opportunities & Constraints Plan

The site offers exciting opportunities to deliver a sensitive extension to the existing settlement, providing both much-needed housing whilst creating opportunities for attractive landscaped spaces with ecological enhancements and natural play. The site is afforded excellent access options, with accurately designed vehicular arrangements possible within the SW corner of the site, whilst a further secondary access point to the east of the site creates potential for pedestrian, cycle and emergency access directly into the existing settlement. The site contains numerous trees and hedgerows that are well-placed to be retained to form an attractive back-drop to liveable streets and spaces. Whilst there are constraints imposed by the gas main and on site ecology, these are manageable and do not compromise the ability of the site to deliver a strong urban design strategy.

KEY

- | | | | |
|--|--|---|---|
|  | Site Boundary |  | Illustrative Location for Storm Water Balancing |
|  | Main Access Route |  | Developable Area Boundary (Approx 3.5ha) |
|  | Secondary Routes |  | Topographical Direction of Fall |
|  | Proposed Landscape Screening/ Buffer Areas |  | Primary Vehicular Access Location |
|  | Existing Gas Main (3m+3m easement) |  | Potential Pedestrian/ Cycle Access |
|  | Views to Cleve Hill and Penn across Valley |  | Pedestrian/ Cycle Route |
|  | Outward Facing Development |  | Public Transport Links Bus Stops |
|  | Rear Garden Response |  | Locally Listed Buildings |
|  | Ecology Constraint/ Feature | | |





VISIONING PRINCIPLES

“ *Our Vision:
To create a sustainable
and sensitively designed
place, that fosters a sense
of well-being, promotes
healthy life-styles and
helps reinforce the strong
existing community spirit.* ”

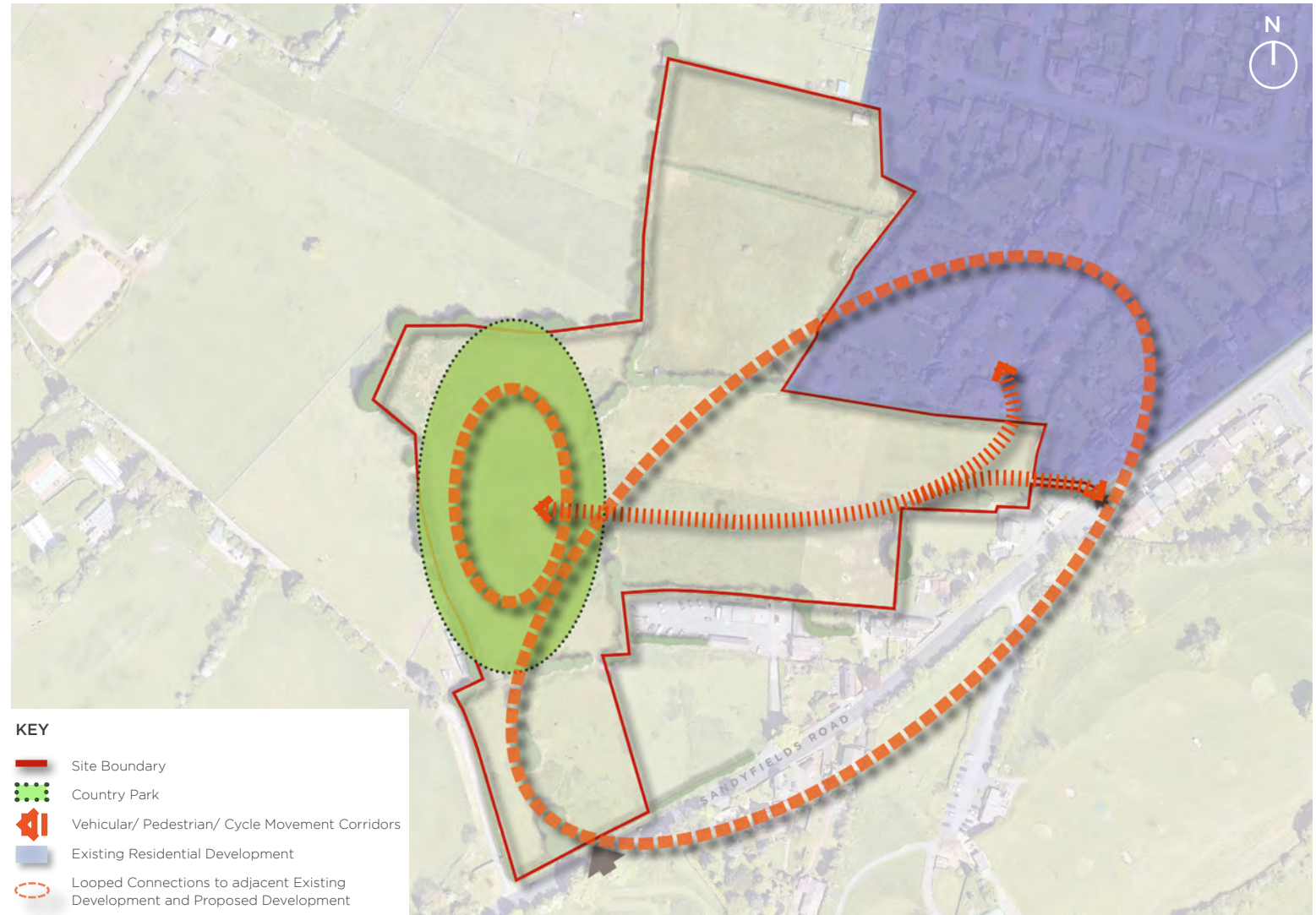


VISIONING PRINCIPLES

The Vision: A Connected Place

It is of vital importance that connectivity is at the forefront of this development. It's unique setting creates an opportunity for giving access and views over the valley landscape to the new and existing community. By nestling the development up to the settlement edge, the fringes can form an exciting, attractive and natural country park environment that will benefit the entire community. The site features a strong and attractive green infrastructure of existing trees and hedgerows that are well-placed to be retained to form an attractive back-drop to liveable streets and spaces. These will assist in managing the masterplan and help deliver an informal character that is focussed on the creation of the strong pedestrian routes from the existing settlement into a new country park landscape incorporating natural play and enhanced ecological habitats.

Whilst there are constraints imposed by the gas main and the sensitivity of on-site ecology, these do not compromise the quality and deliverability of a strong urban design strategy and development due to their locations. The site is afforded with excellent access options, which allow the gas main and on site ecology to be advantageous to the masterplan by forcing the development to be set further back from Sandyfields Road and screened by existing green infrastructure.



Masterplan

The underpinning of this masterplan lies in the existing green infrastructure and its enhancement, and incorporation with a blue infrastructure network.

The masterplan focuses development to the south of the central ridge, hugging the existing settlement, whilst leaving extensive space in the northern areas of the site to act as a landscape country park environment. A new network of SuDs will knit with the green infrastructure to form a characterful landscape of green and blue elements. This is organised to create a walkable public realm network that provides and promotes pedestrian cycle movement to and from the existing settlement to the north-west.

A density of 30dph, with a development of approximately 95-105 homes, is likely to reflect a development of this size with its urban 'edge' location.



LANDSCAPE VISIONING

Landscape Strategy

Sandyfields Road landscape strategy centres around the principles of 'landscape and ecological conservation, enhancement and green and blue networking'. This is evidenced by the retention and protection of all viable, existing trees, hedgerows and vegetation as well as the ecologically sensitive approach to design taken to create a new 'Country Park' in the western part of the Site. This green space will build upon the existing landscape by protecting and enhancing views across to Penn whilst also significantly improving existing habitats for bats, hedgehogs, brown hare, birds and invertebrates in particular. This would all be achieved in conjunction with creating a beautiful and functional space for the existing community and new residents. Landscape interventions within the green space will include creating mown paths into existing and overseeded wildflower meadow, light touch hoggan paths for pedestrian connections, native broadleaved tree, scrub and shrub planting from certified UK provenance and bio-secure plant stock; creating wetland habitats around the new balancing basins and vegetative screening along the more sensitive southern and eastern boundaries where the Site will abut established residential areas.

The enhanced landscape would also be designed with permaculture in mind. This will be achieved by planting fruit trees as well as ornamentals (Apple and Pear) cropping hedgerows (Blackberry, Red and Black Currant) with edible species planted, adaptable and climate resilient and make the very best of existing resources and the local economy such as FSC certified timber street furniture, LED lighting to Bat Conservation Trust guidelines, low water demand and drought tolerant planting throughout, permeable surfacing where possible and low carbon goods as well as wholesale reduction of the use of plastics.



VISIONING PRINCIPLES

Sketch Perspective 1

This artist's impression of the central 'green spine' gives an indication of how this space could feel with its informal character.

Pedestrians and cyclists are separated from cars and given an attractively soft landscaped green space to move towards and from the village centre.

Home frontages ensure that the open space is overlooked, surveilled and feels safe.



Sketch Perspective 2

This artist's impression indicates how a traditional street within the development could feel.

Soft landscaping to home frontages and street trees help to initiate an informal yet cohesive street character, whilst creating a humanistic feel to the street which, is fronted with modest and characterful homes.



PAGE INTENTIONALLY LEFT BLANK

SUMMARY

“ The development vision set out within this document has the potential to deliver a series of benefits as follows, alongside engagement with Dudley Metropolitan Borough Council and South Staffordshire Local Planning Authority:

- The opportunity to integrate into the existing high quality and distinctive character of Dudley in the way that respects the town setting.
- Provide an inclusive mix of upto 105 new homes based on 30dph.
- To create an enhanced landscape framework that increases biodiversity.
- To create a connected place that supports walking and cycling within the settlement through the provision of convenient, high-quality routes.
- A sustainable design approach that responds to the sites constraints and opportunities.

”



View towards Sedgley Police Station



placemaking for life

weareidp.com

Coventry

27 Spon Street, CV1 3BA

e: info@idpgroup.com

t: 024 7652 7600

© IDP CENTRAL LTD