



REPRESENTATION

in respect of
Land South of Bridgnorth Road, Wombourne
South Staffordshire Draft Local Plan Regulation 19 Consultation

on behalf of
Richborough Estates

30 May 2024

Client Reference: 00028j-1-P

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1. INTRODUCTION

- 1.1. This representation is made by RCA Regeneration Ltd on behalf of Richborough Estates, in respect of Land South of Bridgnorth Road, Wombourne 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
HC1	7.3	74
HC2	7.5	76
HC3	7.9	78

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

HC6	7.18	83-84
HC7	7.20	85
HC11	8.4	93
HC12	8.9	95
HC13	8.11	97
EC1	10.3	109
NB4	12.17	141
NB5	13.3	143
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 000s 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.
- 2.10. The most likely outcome of a failure to demonstrate compliance will be that the improvements, beyond that of established and impending S106, CIL, Biodiversity Net Gain and Net Zero obligations.

Vision and Strategic Objectives

- 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 <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>

- 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 is the best way to set standards for energy performance in new buildings. We would refer the council to the Ministerial Statement⁴ 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.
- 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.

⁴ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hlws120>

- 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.
- 2.24. Without such testing, this requirement cannot fairly be applied to development.

Housing

- 2.25. 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 4,726 dwellings over the plan period up to 2041 (just 227 dwellings per annum). This figure takes into account South Staffordshire’s own minimum housing need of 4,086 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.
- 2.26. 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

- 2.27. 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.
- 2.28. We believe that the spatial strategy (policy DS5) should allocate potential housing sites to settlements 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.

3. PART B: SITE ALLOCATIONS

Site Allocations – Housing

- 3.1. The housing allocations at Policy SA3 do not allocate any housing to Wombourne other than safeguarded sites, which seems to be poorly conceived if the council are to make any serious headway with housing delivery to meet need.
- 3.2. Wombourne is a sustainable settlement and to discount it like this because it does not have a railway station is a nonsense. The EDNA⁵ produced by DLP in 2022 identifies Wombourne as part of the 'top tier' of retail centres in the Borough, along with Codsall and Penkridge and it is clearly offering far more than just a large village (para 4.97).
- 3.3. The focus on keeping major housing allocations to Tier 1 settlements does not acknowledge that whilst around 10,381 commuting movements occur between South Staffordshire and Wolverhampton, this is outnumbered by the 8,981 commuting movements within South Staffordshire itself and the in-commuting from Wolverhampton to South Staffordshire (4,448). Had there not been as high a level of self-containment then the focus on settlements with railway stations may have made some sense.
- 3.4. The reality is that commuter trips are generally shorter in this area and Wombourne itself is one of the three main employment centres in the Borough providing a significant number of jobs and business opportunities at Heathmill Road Industrial Estate, Smestow Bridge Industrial Estate and Wombourne Enterprise Park as well as in the retail centre.
- 3.5. Making significant housing allocations in Wombourne would take advantage of its clear sustainability as a settlement and major source of multiple forms of employment.

⁵ https://www.sstaffs.gov.uk/sites/default/files/2023-03/edna_2020-2040_final.pdf

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. 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.
- 4.5. 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.
- 4.6. We agree with Policy HC7 and the need to make exceptional provision for First Homes across South Staffordshire.
- 4.7. We agree with Policies 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.
- 4.8. We recognise the importance of supporting infrastructure within the context of sound policies. 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

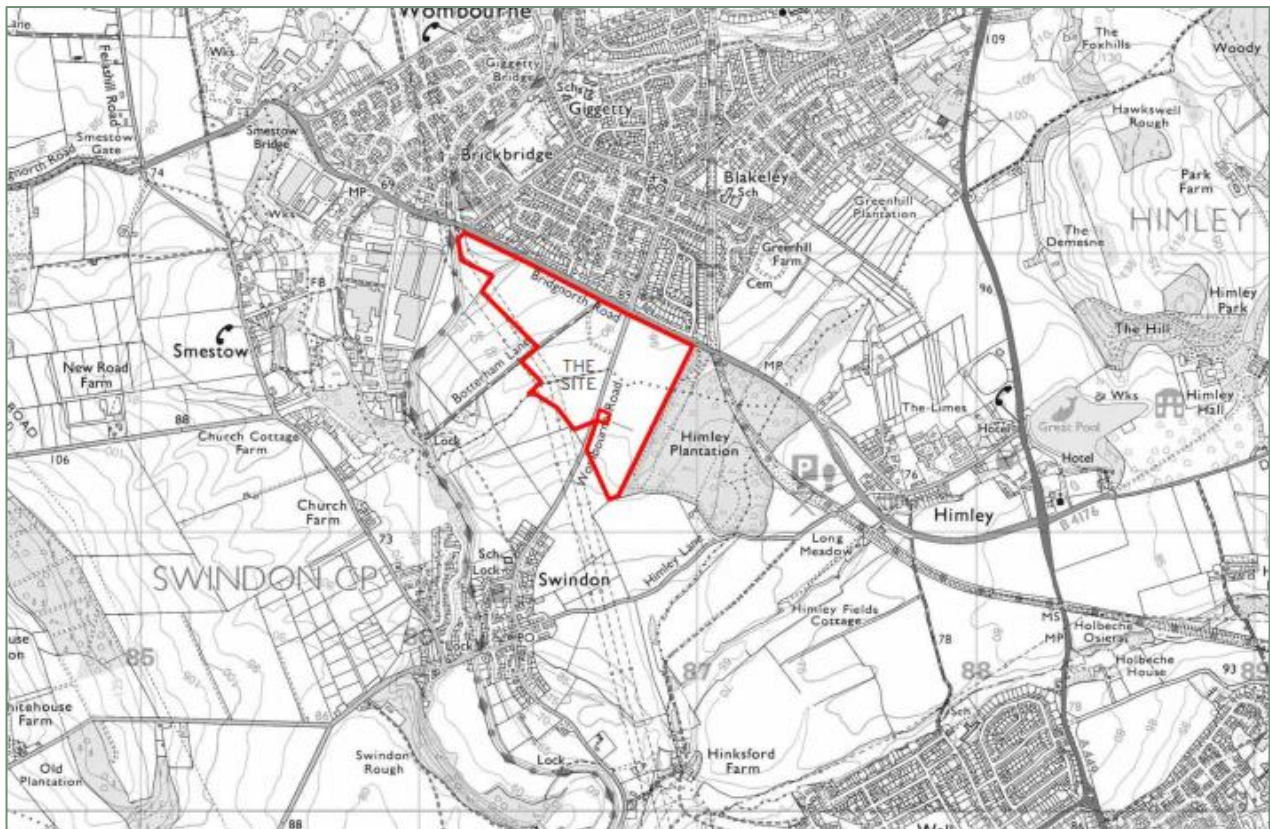
- 5.1. Policy EC1 should recognise the positive economic impacts of housing delivery across the district and make note of the value of investment in local supply chains as well as the creation of short- and long-term employment opportunities, as well as supporting apprenticeships noted in EC3. Local tax revenue associated with more households paying council tax will contribute positively towards funding local services and supporting infrastructure.
- 5.2. Indeed, locating new housing in areas where there are significant jobs is also a benefit for local employers who may struggle to find employees where there are significant constraints to housing supply (especially affordable housing).

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; albeit there are issues with parts of these policies. 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, although "wherever possible" must be added to this statement e.g. for vehicular access to new development sites.
- 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 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 South of Bridgnorth Road, Wombourne has not been included as an allocation within the Publication Plan document. The site would make a valuable contribution towards meeting the district housing target 4,086 homes over the period to 2041 and make a contribution towards the significant unmet need arising from neighbouring authorities.
- 7.2. The site itself extends across 30.58 Ha (75.47 acres), comprising of several regularly sized agricultural fields. The fields are bounded by mature, trimmed field hedgerow with the occasional hedgerow tree.
- 7.3. The site is located between urban and landscape contexts and is related well to the existing and established residential edge of Wombourne. The village is comprised of medium-density and contemporary development, of which varies in form, character and style. Towards the north of the site is Bridgnorth Road (B4176), and both Botterham Lane and Wombourne Road runs throughout the centre of the site.
- 7.4. The site plan below shows the extent of the site in relation to the existing surrounding settlements.



- 7.5. The site is wholly within the Green belt, and the western boundary abuts the Wombourne Conservation Area which runs alongside Botterham Lane. Other than these two constraints, the site is considered to be unconstrained. There are no further landscape or heritage designations associated with the site. A PRoW runs alongside Botterham Lane and Himley Plantation (SBI) abuts the eastern boundary.
- 7.6. Furthermore, the site presents an excellent opportunity for a sustainable residential development or mixed use develop, since it is adjacent to the existing settlement of Wombourne and the surrounding areas of employment land. Previous representations have included a submitted

Vision Document (appended below), which explains the sites constraints and opportunities through an indicative landscape masterplan. An illustration of how the site may be delivered is included below.



- 7.7. The proposals would introduce green infrastructure within the site not only in a 'compensatory' way, but it would also provide a strategic network of public open space for the community, of which was not previously available for residents. The open space would provide the community with a new park and open space. We consider that this would balance positively against any potential landscape criteria harm caused by the loss of Green Belt Land.
- 7.8. Furthermore, the site is considered to have a low biodiversity value (save for the areas of hedgerow and trees). The proposed landscaping and extensive planting would positively impact biodiversity net gain across the site. The existing hedgerow and trees offer some habitats for birds, mammals and insects. These landscaping features would be retained within any new scheme and incorporated within a new biodiversity network throughout the site.
- 7.9. The site is wholly within Flood Zone 1, with no significant surface water drainage constraints, as demonstrated in FRA work undertaken by BWB. There would however be space within the site for attenuation measures, such as basins, to be included.
- 7.10. The site has already been subject to previous representations at preferred options, Issues and Options, Spatial Housing Strategy stages and the previous iteration of the Publication Plan, under the site references 626, 627, 628 and 629. The deliverability comments received in the assessment suggested that the site was potentially suitable for residential development but was constrained by the Green Belt. Whereas the assessment commented that the site:

'Could be brought forward as part of a comprehensive scheme, or separately, depending on the Council's housing and infrastructure requirements. Part of site 629 includes proposal for a country park. Site is directly adjacent to an SBI. Village edge site modelled at 32 dwellings per hectare.'

- 7.11. The site is also within close proximity to the proposed allocations on 'Land off Pool House Road' (site reference: 285, 562/415 and 459, under Policy SA2) within the Reg 19 Publication Plan to deliver 223 dwellings.
- 7.12. We would like to highlight the following points about the site, particularly as the site could deliver around 1,068 dwellings (based on the net density of 35 dph). However, the aspiration of the developer is to deliver around 350 new homes, having regard to the need for compensatory open space, biodiversity net gain, the existing settlement pattern and the local character. The site could also be delivered within the first five years of the Plan period, without the need for major infrastructure investment. The site relates well to the existing established settlement edge of Wombourne, whilst having the opportunity to provide a more definitive boundary to the Green Belt beyond. We therefore consider that the site presents a sustainable opportunity to deliver much needed housing and associated investment in the local area.
- 7.13. Overall, for the reasons stated above, we believe that the site could deliver a successful example of sustainable development which would benefit the public realm extensively. The development of the site would result in new parks and play spaces, as well as a safe route to school for children and employees working in the neighbouring industrial estates.
- 7.14. An allocation here would serve as a logical site to deliver unmet housing need arising from Black Country who continue to be unable to deliver their own housing need within their boundaries.
- 7.15. Richborough Estates have submitted a vision document as part of our previous representations which further details the benefits of the site. This has been included in Appendix A.
- 7.16. For the reasons highlighted above, we urge that the council should give further consideration to our client's site: Land South of Bridgnorth Road, Wombourne and it should be included as a housing allocation within the Submission Plan.

APPENDIX A: VISION DOCUMENT



Design Background Document

Land south of Bridgnorth Road, Wombourne. South Staffordshire

Produced by Richborough Estates. April 2018



01

Introduction

Richborough Estates

Richborough Estates is one of the UK's most successful strategic land promotion businesses whose aim is to work in partnership with local communities, Councils and other local stakeholders.

Working across the country, our projects range from large urban extension sites to smaller developments of 50-100 dwellings, including sites within Green Belt.

Richborough Estates oversee entire planning processes from start to finish and seek to work closely with local communities, Planning Officers and Councils to create the most mutually beneficial schemes.

Purpose of the document

- 1.1 This background document explains the initial design vision and development potential for land located south of Bridgnorth Road in Wombourne, Staffordshire.
- 1.2 The document includes an overarching illustrative masterplan which explains how the site could come forward to deliver a high quality residential development comprising around 460 dwellings, a potential new primary school and associated landscaped green space, including allotments, community orchards, children's play and a new skate park.
- 1.3 A brief description of the site and its surroundings is also provided, together with a summary of key design principles. An overview of potential community benefits concludes the document.
- 1.4 What is presented in this document is not intended to be a fully worked-up scheme, however has been prepared for illustrative purposes to assist early discussions with South Staffordshire District Council and key stakeholders.

This document is designed to be viewed at A4 size.

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Site location in context



The Development Site

The development site

- 2.1 The site comprises four conjoined parcels of agricultural land sustainably located on the southern urban edge of Wombourne and within Green Belt.
- 2.2 Collectively, the site extends to about 30.5 hectares (75.4 acres) and in development terms, would represent a logical extension and 'rounding' to the existing settlement edge.
- 2.3 Access to each parcel would be gained via the existing adopted highway network; with multiple access points enabling development construction and new housing to be delivered provided in a phased and flexible manner.
- 2.4 A choice of pedestrian footways and recreational walks provide access to countryside and a range of local facilities located within a short walking distance of the including:
 - Heath Mill Road Industrial/ Commercial Estate (including Sainsburys Supermarket);
 - Waggon & Horses Public House;
 - Parade of local shops on Common Road;
 - Wombourne Methodist Church;
 - Blakely Heath Primary School & Cherry Trees Community Special School;
 - South Staffordshire Railway Walk; and
 - Bus stops along Bridgnorth Road.
- 2.5 Situated between urban and landscape contexts, the site is well related to existing and established residential edge of Wombourne, which comprises medium density, contemporary development of varying form, character and style.
- 2.6 The four parcels are as follows:

Parcel A Bridgnorth Road

- Parcel A comprises the north western area of the development site and encompasses lower lying land.
- Situated immediately south of the juncture of Brickbridge Lane and Bridgnorth Road, the site extends to approximately 1.79 hectares (4.41 acres). Several pylons and overhead cables are located within the site.
- Bridgnorth Road borders the northern edge of the site whilst its western edge sits against a backdrop of retail and employment buildings comprising the Heath Mill Road Industrial and Commercial Estate.
- The Staffordshire and Worcestershire Canal Conservation Area is located immediately to the west of parcel A, along which a National Trail (towpath) runs broadly in a north-south direction. Views towards the overall site are possible from a range of vantage points along the towpath due to the open character and rising landform of the landscape.

Parcel B Bridgnorth Road/ Botterham Lane

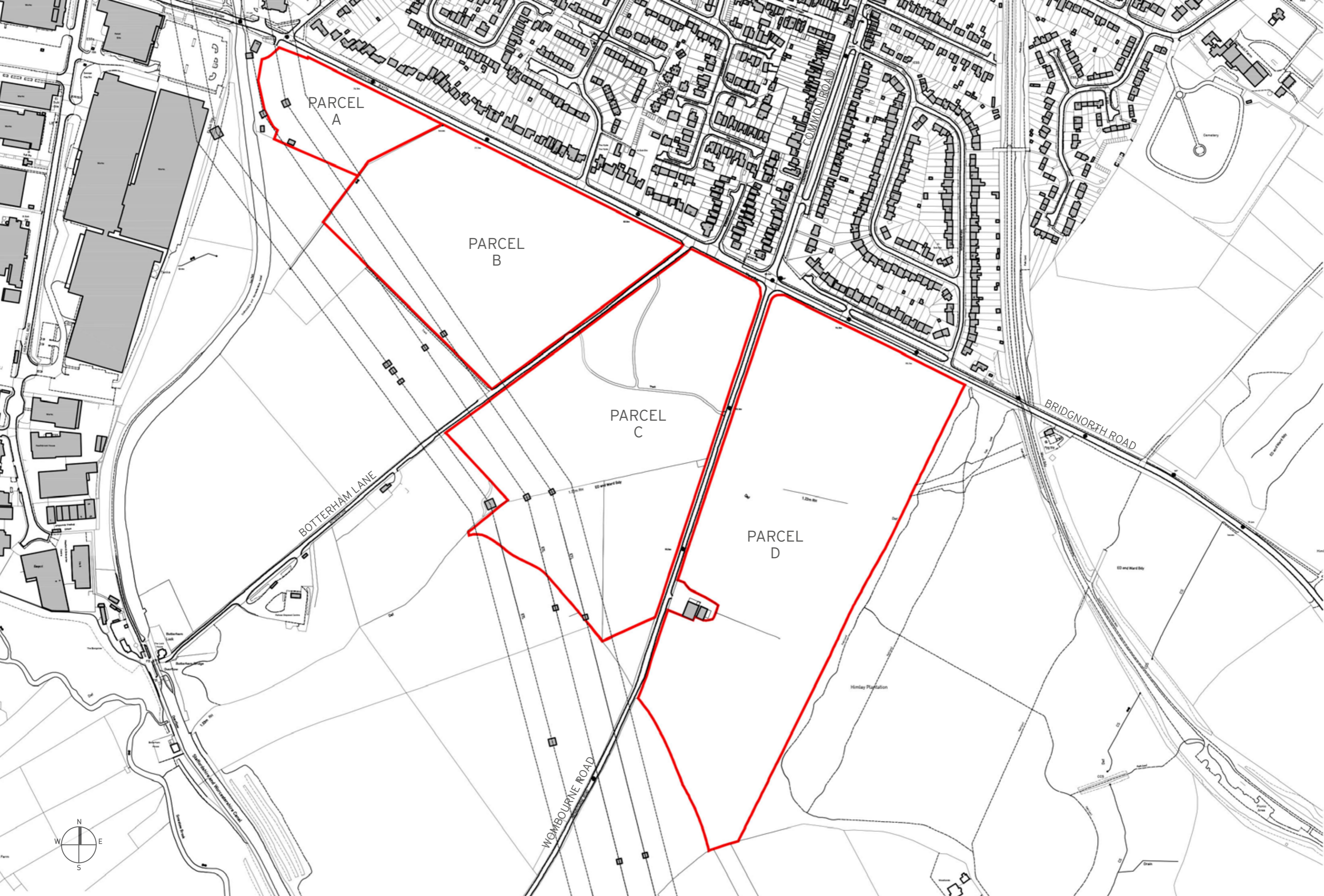
- Parcel B comprises the central part of the site and has a sloping topography which rises to a localised high point in the south.
- Overhead electricity power cables and pylons cross the south western area of the site and influence skyline views from Bridgnorth Road to the north and the Conservation Area to the west.
- Situated immediately west of the juncture of Botterham Lane and Bridgnorth Road, parcel B extends to around 7.06 hectares (17.44 acres) and has a good frontage relationship with the existing settlement edge, which comprises linear patterns of dwellings that overlook the site.
- The site benefits from access to an established network of public footpaths, providing a choice of routes to countryside and local villages such as Swindon, Hincksford and Himley. Botterham Lane flanks the south eastern edge of the site, along which runs a public footpath that joins with the Staffordshire and Worcestershire National (towpath) trail located to the south.

Parcel C Bridgnorth Road/ Wombourne Road

- Parcel C extends to approximately 9.36 hectares (23.13 acres) and also forms the central area of the site.
- Bridgnorth Road runs alongside the northern site boundary, whilst Botterham Lane (and public footpath) bounds to the west and Wombourne Road to the southeast.
- The site has a sloping landform which rises (steeply in places) to a localised high point situated to the south.
- Views of the site and the existing urban edge from the village of Swindon to the south are limited by rising landform.
- Views of the site from Bridgnorth Road are influenced by electricity pylons and overhead cables which cross the southern edge of the site and generally encompass higher lying ground.

Parcel D Bridgnorth Road

- Parcel D occupies a gateway location, situated at the eastern entry point into the village, just south of Bridgnorth Road. The site extends to approximately 12.30 hectares (30.39 acres) and comprises the eastern area of the development site.
- Edges of the site are largely defined by established hedgerows. Some internal field enclosures are also present within the central area.
- The site's topography rises to a central ridge line before falling more steeply to the south and the village of Swindon.
- Himley Plantation is a Local Wildlife Site and borders the eastern edge of Parcel D, through which a number of recreational routes pass and join with the nearby South Staffordshire Railway walk (Local Nature Reserve) located to the north.
- An underground water main is understood to diagonally cross the central area of the site, broadly running in a northeast - south westerly direction.



Parcel locations



Site surroundings

Local context

- 3.1 The southern edge of Wombourne comprises mostly residential development and provides a defined and consistent settlement edge alongside Bridgnorth Road and Wombourne Park. The area comprises a series of contemporary residential suburbs which over time, have incrementally expanded the settlement envelope southwards. The existing settlement edge however does not relate particularly well to the countryside.
- 3.2 Local vernacular within the vicinity of the site is varied, as are house designs which generally comprises a palette of traditional materials including red and orange brick, light coloured renders, grey and brown roof tiles and a range of door, window and canopy styles.
- 3.3 Residential areas are of medium density, with some contrasting pockets, of lower and higher development scattered between. Building patterns are mostly linear and based on block structure principles (back-to-back patterns of buildings).
- 3.4 Local facilities are located within the vicinity of the site; the closest being a public house and supermarket situated to the north west. A parade of local shops and Blakely Heath Primary School are also situated north around the area of Common Road, which leads directly southwards to the central area of the site.
- 3.5 The site is not covered by a statutory or non statutory site designated for nature conservation. The nearest statutory designated site is part of the South Staffordshire Railway Walk Local Nature Reserve which lies near to the north eastern site boundary. This area is designated for its woodland habitats, heathland plants, rich flower glades, streams and watercourses, as well as notable bird species.
- 3.6 The nearest non-statutory designated site is Himley Plantation, an area of semi-natural broad leaved woodland located to the east of the site, within which there a number of recreational walks that are accessible via Bridgnorth Road.

Parcel A



Parcel B



Existing facilities and local vernacular



Conservation Area towpath



Waggon & Horses Public House
Bridgnorth Road



Existing residential edge
Bridgnorth Road



Himley Plantation



Sainsburys
Mill Heath Road



Existing residential edge
Wombourne Park

Parcel C



Parcel D



- 3.7 The site is predominantly arable bordered with hedgerows and at the time of writing no priority habitats or ponds appear present.
- 3.8 The site is not covered by any statutory landscape designation and falls within the 'Sandstone Estatelands' Landscape Character Area Type.
- 3.9 A towpath walk runs alongside the Staffordshire and Worcestershire Canalside which is designated a Conservation Area. From here, views towards and across the site are possible from a range of vantage points and are influenced by the settlement edge along Bridgnorth Road and pylons (see image, right).
- 3.10 Pylons and overhead cables cross each land parcel which comprise the overall site and would be subject to a no-build easement.
- 3.11 The majority of pylons occupy higher lying ground and influence contextual views. Locally, there are examples of how dwellings and landscape filter/ part- screen views of pylons and these are useful design cues which a development proposal could consider.



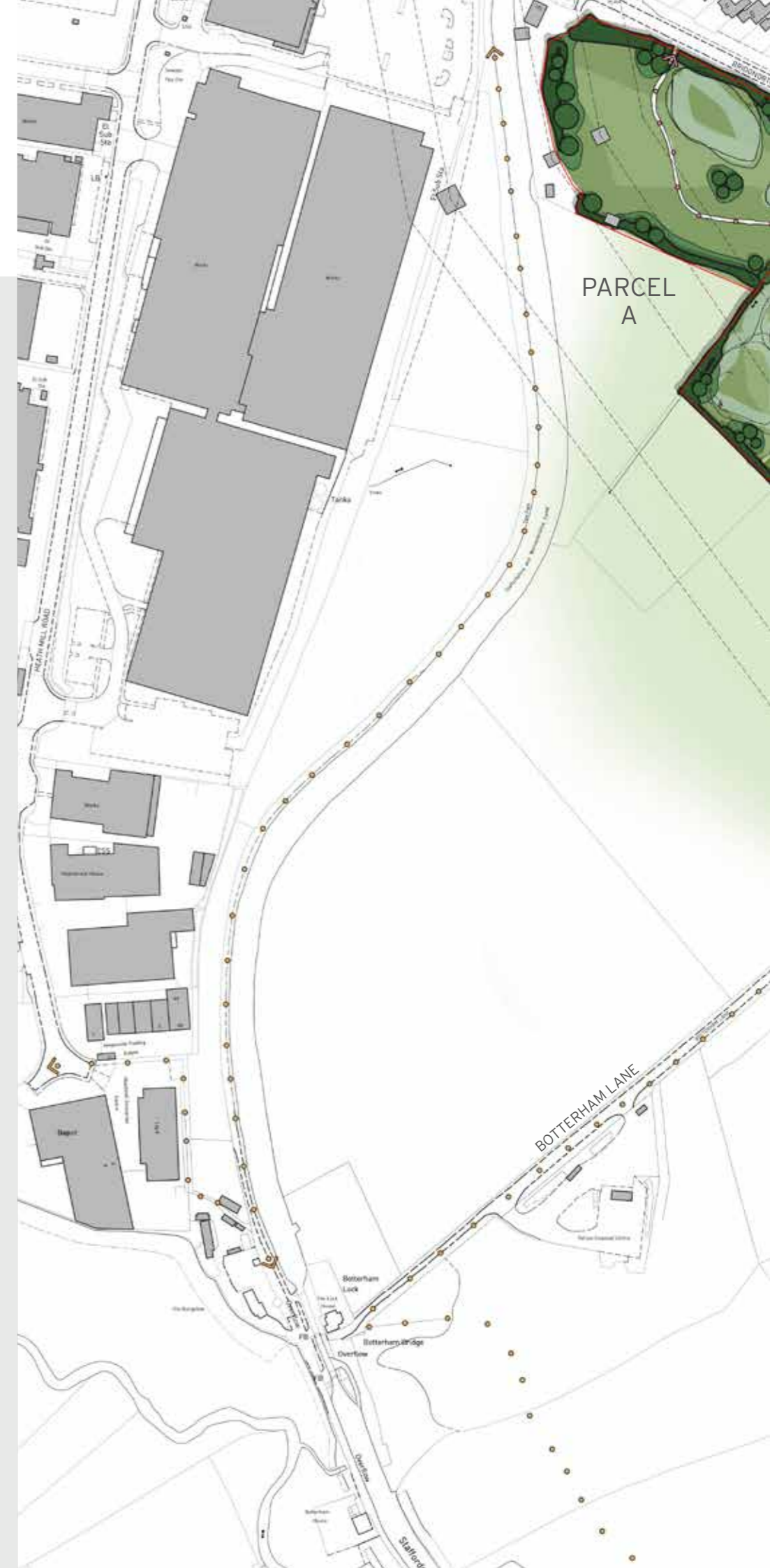
Existing settlement edge
View looking east to Bridgnorth Road
from Conservation Area towpath

04 Vision

Proposed illustrative masterplan

- 4.1 The overarching vision for land south of Bridgnorth Road is to create an attractive and high quality neighbourhood which responds positively to its urban and landscape surroundings.
- 4.2 The indicative masterplan seeks to encourage sustainable modes of travel, through the provision of a fully accessible and integrated pedestrian/cycle route network, opening up the recreational benefits of the site to both new and existing residents.
- 4.3 The indicative masterplan is structured around an extensive and meaningful network of green infrastructure which will address views to and from the site and provide safe, attractive and convenient access to new public open spaces and new residential areas provided as part of the development.
- 4.4 The vision includes the creation of residential character areas, which will create identity, distinctiveness and promote a sense of place. A permeable hierarchy of streets and places, together with a green infrastructure network will draw together and complement proposed character areas, the composition of which will be influenced by an understanding of the site's context.
- 4.5 The overarching vision is based upon the following design principles:

- To create a movement network which opens up public access to the site, enhances existing linkages to facilities and services within Wombourne and promotes sustainable modes of travel
- To provide the right ingredients for a balanced and sustainable new development, providing a range of new housing types, sizes and tenures, green infrastructure and potential educational facilities
- To create a sense of place and a new living environment of the highest standard, with a recognisable identity which is complementary to the character of Wombourne
- To create high quality, enhanced edges which positively assimilate new development into the existing urban and landscape context
- To retain, integrate and safeguard existing landscape into the new development and to utilise existing features in providing an enduring new Green Belt boundary
- To create safe, attractive and secure residential communities, with streets and places which promote social interaction and afford access and movement priority to pedestrians
- To create a development which will enhance the attraction of Wombourne as a place to live, incorporating aspects of local character, heritage, landscape, amenity and biodiversity





PARCEL B

PARCEL C

PARCEL D

WOMBOURNE ROAD

BRIDGNORTH ROAD

KEY

-  Proposed residential development
Circa 460no. dwellings
-  Public open space
-  Existing landscape
-  Equipped children's play spaces and natural play
-  Proposed landscape
-  Community orchards
-  Allotments and car park
-  Children's natural play areas
-  Landscaped green corridors
-  Proposed indicative SuDS
-  Key pedestrian routes and circular walks
-  Existing public footpaths
-  Potential primary school site
1.3 hectares





Design Principles

Parcel A Bridgnorth Road

Main site & contextual considerations

- Rising landform and site low point situated to the north west
- Perimeter (northern) areas of the site prone to surface water flooding
- Adjacency of Staffordshire and Worcestershire Canal Conservation Area
- Existing perimeter landscape (hedgerows)
- Electricity pylons, overhead cables and associated easements
- Open landscape character and contextual views

Proposed development quantum

Site Area:	4.41 acres/ 1.79 hectares
Net Development Area:	N/A
Public Open Space:	4.41 acres/ 1.79 hectares
Proposed number of dwellings:	N/A
Average net density:	N/A

Access and movement

- 5.1 Parcel A is proposed to comprise wholly landscaped public open space.
- 5.2 A new pedestrian footway would be provided along the southern edge of Bridgnorth Road to enhance linkages to local existing facilities and public transport connections. Such provision would be accommodated within the existing grassed verge and would avoid extensive hedgerow removal.
- 5.3 A new pedestrian/cycle connection route would lead into the site via Bridgnorth Road and provide a direct link to new residential areas and open space located within parcel B.
- 5.4 New footways would promote the existing National (towpath) route alongside the Staffordshire and Worcestershire Canal situated to the west and the public footpath along Botterham Lane to the south.
- 5.5 Two pedestrian crossings would also be likely provided on Bridgnorth Road, opening up the recreational benefits of the site to the wider residential community of Wombourne.

Green infrastructure

- 5.6 Parcel A would comprise predominantly natural and semi-natural green space. New native planting would be provided to soften edges of the development and achieve a landscaped gateway, addressing movement patterns from the west and views from Bridgnorth Road.
- 5.7 New landscape would filter views of existing buildings within the Mill Heath Road Industrial/ Commercial Estate, doubling as a buffer to the Conservation Area to the west.
- 5.8 Sustainable drainage features would maximise the site low point and rationalise existing areas which Environment Agency mapping shows to be prone to surface water flooding. These features would complement new native landscape schemes and would include features suitable for wildlife.



Parcel B Bridgnorth Road/ Botterham Lane

Main site & contextual considerations

- Rising topography. Site high point located to the south
- Existing perimeter landscape (hedgerows)
- Electricity pylons, overhead cables and associated easements
- Existing building heights, residential patterns, densities and amenity
- Views approaching the site from Bridgnorth Road and Botterham Lane
- Existing (adjoining) public footpath and associated views/ amenity
- Adjacency of Staffordshire and Worcestershire Canal Conservation Area and associated views
- Contextual views

Proposed development quantum

Site Area:	17.44 acres/ 7.06 hectares
Net Development Area:	10.84 acres/ 4.39 hectares
Public Open Space:	6.22 acres/ 2.52 hectares
Proposed number of dwellings:	Circa 155no.
Average net density:	35 dwellings per hectare

Access and movement

- 5.9 Initial investigations demonstrate that a viable vehicular access to serve the development could be created via a single point off Bridgnorth Road, which would be positioned broadly centrally on the northern boundary of parcel B.
- 5.10 A principal street would lead into the development and loop around its central core. The route would have a identifiable, verdant character and would underpin a hierarchy of lower category streets and lanes.
- 5.11 The arrangement and type of new streets would work in harmony with the sloping topography of the site, dispersing new movement to edges of the development, in line with the adopted Staffordshire Highways Design Guide.
- 5.12 To assist movement from one area of the development to another, a number of focal spaces and landscaped greens would be dispersed along the principal street, demarking junctures between street types and character areas.
- 5.13 A new pedestrian footway would be provided along the southern edge of Bridgnorth Road and accommodated within the existing verge.
- 5.14 A permeable network of pedestrian footpaths would provide a choice of circuitous routes leading to new public open space and residential areas. These routes would join with Bridgnorth Road to the north and the existing public footpath along Botterham Lane to the south.
- 5.15 The illustrative masterplan makes allowance for car and cycle parking provision in line with standards prescribed South Staffordshire District Council's Core Strategy.

Design

- 5.16 The illustrative masterplan seeks to make efficient use of space and uses best-practice block structure principles. This ensures rear gardens are securely enclosed and frontages achieve natural surveillance of the public realm.
- 5.17 The design assimilates new development into the existing residential context by creating a new residential frontage which softly mirrors existing housing patterns along Bridgnorth Road.
- 5.18 A new housing frontage would also be provided along Botterham Lane. Comprising less formal and lower density housing patterns. This edge would be tapered and more fluid to address the transition into the wider countryside and would be offset from existing hedgerows and higher lying ground.
- 5.19 Higher density housing would be generally focused to central areas of the development, achieving increased definition of focal spaces and the main route through the development.
- 5.20 Lower density housing would mostly comprise outer edges of the development; generously offset from existing pylons/ overhead cables and creating a softer, enhanced new active edge to the village.
- 5.21 Development massing would comprise mostly 2 storey buildings, with the occasional slightly taller building to define gateways and complement focal spaces.
- 5.22 To engender a balanced, vibrant and sustainable new residential community, the illustrative masterplan allows for the provision of a range dwelling types, sizes and tenures, including 40% affordable housing provision in line with current policy requirements.

Green infrastructure

- 5.23 Perimeter areas of the site would be reserved as public open space to help soften and filter views of the development. These spaces would retain and safeguard existing landscape features.
- 5.24 Perimeter edges would feed into central areas of the development, using contrasting landscape designs, themes and materials to define main routes, development character areas and focal spaces. Using the sloping topography of the site, these areas would afford new tree and shrub planting that would filter (contextual) rising views of the development.
- 5.25 A range of open space typologies would be provided as part of the development, including natural and semi-natural green space, a community orchard, children's natural play and blue infrastructure. These spaces would be linked via green corridors and residential streets, opening up the recreational benefits of the site to both new and existing residential communities.
- 5.26 Western and southern edges of the site would be reserved as public open space, retaining a 'green ridge' and integrating the existing pylons and overhead cables. This space would also act as a buffer to the Conservation Area to the west and comprise the new Green Belt boundary.
- 5.27 A summary of proposed open space typologies can be found on Page 18.



Parcel C Bridgnorth Road/ Wombourne Road

Access and movement

- 5.28 Initial investigations demonstrate that a viable vehicular access to serve the development could be created via a single point off Wombourne Road, which would be suitably distanced from the existing signaled junction with Bridgnorth Road.
- 5.29 A new 30mph speed limit would be implemented on Wombourne Road to the south of the site, together with a new gateway feature to signify arrival into the village.
- 5.30 A principal street would lead into and loop around the central area of the development. The route would have a more formal character to underpin a hierarchy of secondary streets and lanes which would disperse traffic to edges of the development.
- 5.31 The arrangement of new streets would work in harmony with the sloping topography of the site, and accord with the requirements of the adopted Staffordshire Highways Design Guide.
- 5.32 A series of shared surface spaces and focal green spaces would be dispersed along the principal street, to which new streets and pedestrian routes would lead and pass through. These spaces would create legibility and visual interest to new streetscenes, assisting movement from one area of the development to another.
- 5.33 A new pedestrian footway would be provided along the southern edge of Bridgnorth Road and accommodated within the existing verge. The footpath would join with parcels A, B and D, improving accessibility to existing bus stops and local facilities.
- 5.34 A network of footpaths would open up the site to new public open space and residential areas provided as part of the development. A choice of safe, circuitous walks would be provided, joining with Bridgnorth Road and Botterham Lane to the north and Wombourne Road to the south.

Main site & contextual considerations

- Rising topography, steeper sloping landform and associated high/low points
- Existing perimeter landscape (hedgerows) and internal field enclosures
- Electricity pylons, overhead cables and associated easements
- Existing building heights, residential patterns, densities and amenity
- Approaching views of the site from Bridgnorth Road, Botterham Lane and Wombourne Road (ie: north and south)
- Existing public footpath and associated amenity
- Views of the site from Common Road

- 5.35 The illustrative masterplan makes allowance for car and cycle parking provision in line with standards prescribed South Staffordshire District Council's Core Strategy.

Design

- 5.36 The illustrative masterplan seeks to make efficient use of space and uses best-practice block structure principles. This approach ensures rear gardens are securely enclosed and frontages achieve natural surveillance of the public realm.
- 5.37 The design includes the creation of a new gateway or 'node' on Bridgnorth Road using building heights and landscape to emphasise the arrival point into the central area of the development.
- 5.38 A new housing frontage would also be provided along Wombourne Road. Comprising less formal patterns, this edge would be tapered to address the approach into Wombourne from the south and would sit behind the existing hedgerow.
- 5.39 Higher density housing would be focused to central areas of the development, helping to define a new central green and the main route through the development.
- 5.40 Lower density housing would comprise outer edges of the development, offset from retained pylons and associated easements, to provide a softer, more fluid edge to the settlement and an enhanced transition to the wider countryside.
- 5.41 Building heights would comprise mostly 2 storey buildings with the occasional slightly taller building to emphasise the gateway, nodes and other focal spaces. Overall, development massing would tier with the falling topography of the site and be of a commensurate (albeit more articulated) scale to the existing village edge.

Proposed development quantum

Site Area:	23.13 acres/ 9.36 hectares
Net Development Area:	8.88 acres/ 3.59 hectares
Public Open Space:	13.78 acres/ 5.58 hectares
Proposed number of dwellings:	Circa 125no.
Average net density:	35 dwellings per hectare

- 5.42 To engender a balanced, vibrant and sustainable new residential community, the illustrative masterplan allows for the provision of a range dwelling types, sizes and tenures, including 40% affordable housing provision in line with current policy requirements.

Green infrastructure

- 5.43 Areas of higher and lower lying landform would be reserved from development and incorporated into new green and blue infrastructure. Perimeter areas and existing landscape would also be retained as green space to soften new built form and complement new gateways and nodes.
- 5.44 Green infrastructure would be dispersed throughout the development, providing a connected network of walks which would improve east-west and north-south circulation.
- 5.45 Green infrastructure would comprise a range of open space typologies, including natural and semi-natural green space, children's natural and equipped play, a country park, community orchards, blue infrastructure and allotments area with communal parking. These spaces would be linked and accessible via green corridors and overlooked by active housing frontages.
- 5.46 Development would be well offset from the existing pylons and overhead cables, which would comprise the new Green Belt boundary. This area would be designated as public open space and augmented with new native landscape and tree belts.
- 5.47 The site high point and ridge would be integrated into a new country park, utilising sloping landform to limit inter-visibility of the new built form from views to the south and maintaining a sense of openness.



Parcel D Bridgnorth Road

Main site & contextual considerations

- Sloping landform, rising to a centralised ridge with some steeper areas of landform to the south
- Existing landscape (hedgerows and trees)
- Himley Plantation (Local Wildlife Site) associated ecological offsets and recreational routes located within
- Proximity of South Staffordshire Railway Walk (Local Nature Reserve)
- Underground water main and associated easement
- Village gateway location
- Approaching views from Wombourne Road (south) and Bridgnorth Road (east)

Proposed development quantum

Site Area:	30.39 acres/ 12.30 hectares
Net residential development Area*:	12.81 acres/ 5.18 hectares
Net (primary) school :	3.21 acres/ 1.3 hectares
Public Open Space:	16.96 acres/ 6.86 hectares
Proposed number of dwellings:	Circa 180no.
Average net density:	35 dwellings per hectare

* Provision of new primary school would reduce proposed residential quantum circa 45no. dwellings.

Access and movement

- 5.48 Initial investigations demonstrate that a viable vehicular access to serve the development could be created via a single point off Bridgnorth Road, which would be suitably staggered from the junctions of Common Road and Wombourne Park opposite.
- 5.49 A new gateway feature would be provided to demark entry into the village and located within the vicinity of the north eastern site boundary.
- 5.50 A principal street would lead into the development and loop around its central core. The route would have a formal, more verdant character and would underpin a hierarchy of lower order residential streets and lanes.
- 5.51 A number of legible focal spaces and landscaped greens would be dispersed around the development and along main routes, generally demarking the junctures between street types and character areas and creating visual interest within new residential streetscenes.
- 5.52 A new pedestrian footway would be provided along the southern edge of Bridgnorth Road and accommodated within the existing verge. A new pedestrian crossing would also likely be provided.
- 5.53 A network of pedestrian footpaths would provide a choice of attractive routes to new public open spaces and residential areas. Where possible, these routes would promote existing routes within the adjacent Himley Plantation and the nearby South Staffordshire Railway Walk.
- 5.54 The illustrative masterplan makes allowance for car and cycle parking provision in line with standards prescribed South Staffordshire District Council's Core Strategy.

Design

- 5.55 The illustrative masterplan seeks to make efficient use of space and uses best-practice block structure principles. This approach ensures rear gardens are securely enclosed and frontages achieve natural surveillance of the public realm.
- 5.56 The design seeks to assimilate new development into the existing residential context by providing a softer residential edge which logically mirrors existing housing patterns on Wombourne Park.
- 5.57 The design would include high quality new marker buildings and landscaped offsets to enhance the approach into Wombourne, providing an attractive new gateway into the village.
- 5.58 Higher density patterns of housing would be generally focused to the central area of the development, also helping to define internal focal spaces and the main route through the development.
- 5.59 Areas of lower density housing would be limited to outer edges of the development and gateway locations. These areas would be offset from Himley Plantation and the existing water main to provide a softer, more articulated settlement edge, enhancing the existing transition between urban and landscape contexts.
- 5.60 Development massing would comprise mostly 2 storey buildings with the occasional slightly taller building to complement the new village gateway and other focal spaces. Overall, development would be distanced to avoid higher lying ground, utilising the wider landscape landform to mitigate impact and views from lower lying surrounding areas.
- 5.61 To engender a balanced, vibrant and sustainable new residential community, the illustrative masterplan allows for the provision of a range dwelling types, sizes and tenures, including 40% affordable housing provision in line with current policy requirements.













Green infrastructure

- 5.62 Areas of higher and lower lying landform would be reserved from development and incorporated into new green and blue infrastructure. Perimeter areas and existing landscape would be retained as green space to soften new built form, address views and to enhance the new village gateway.
- 5.63 Existing landscape features would be retained and integrated in public open space. To address potential ecology, development would be offset from these areas and also the adjacent Himley Plantation.
- 5.64 Landscaped edges would feed into central areas of the development, helping to define main routes, character areas and focal spaces. Using the sloping topography of the site, these areas would afford new tree planting which would filter rising (contextual) views of the development.
- 5.65 A range of open space typologies would be provided, including natural and semi-natural green space, a country park, children's natural and equipped play, a skate park and community orchards. These spaces would be linked to residential areas via a series of landscaped green corridors and new footpaths.
- 5.66 Development would be offset from the existing water main, pylons and overhead cables; the latter comprising the new Green Belt boundary. This space would be designated as public open space and augmented with new native landscape and tree belts.
- 5.67 The site high point and ridge would be reserved as a new country park, using offsets and topography to limit inter-visibility of development from rising views to the south and to maintain a sense of openness.



06

Potential Community Benefits

- Key**
-  Village and development gateways
 -  Focal spaces and nodes
 -  Principal streets and vehicular accesses
 -  Main walking routes
 -  Allotments and car parking
 -  Community Orchards
 -  Natural play and wildlife trails
 -  Potential skate park
 -  Country Park and high points
 -  Equipped children's play
 -  Potential primary school
 -  Indicative pedestrian crossings

Arrival node

Area of landscaped public open space with new pedestrian links onto Bridgnorth Road. Provides buffer to the adjacent Staffordshire & Worcestershire Canal Conservation Area and signifies the development arrival point.

Public Open Space

Corridor of public open space with new native landscaping and tree belts to filter views of the development from the Conservation Area and public towpath/ National Trail. Includes new pedestrian walks with natural play areas dispersed along the way.

Allotments

New allotments with public car park.

Skate Park

Assimilated into a central landscaped green and overlooked by new housing. Positioned within walking distance of a potential new primary school and a new equipped children's play area. It is understood that the Parish Council have a desire to provide a new skate park within Wombourne and funds are available.

New walking routes

A choice of circular walks and recreational routes, leading to a potential new primary school, new public open space and residential areas. These routes would join with Bridgnorth Road and promote access to existing wider routes such as the Staffordshire and Worcestershire Canal towpath, Himley Plantation and the South Staffordshire Railway Walk.

Country Park

Areas of higher lying land would be reserved as a new country park. In conjunction with retained existing pylons and overhead power lines, this area would contribute to the formation of a new Green Belt boundary and would limit views of new development from the south.



Green infrastructure and movement strategy



Central gateway

This space would add new visual interest to the existing residential streetscene along Bridgnorth Road, providing an attractive gateway into the development and a high quality landscaped space. This place would also be an attractive area for residents en route to existing local facilities on Common Road.

Improved pedestrian and cycles accessibility

A new footway along the southern edge of Bridgnorth Road, together with new pedestrian crossings.

Arrival node/ Village gateway

High quality buildings and landscape designs to mirror the existing building line on Bridgnorth Road/ Wombourne Park and address approaching views. Provision of a new fixed gateway feature and contrasting surfacing to better signify entry into the village.

Primary School

Potential location for primary school and associated facilities. Situated adjacent to the main development access and within walking distance of new and existing residential communities.

Ecology corridors, natural play and educational nature trails

Corridor of natural open space acting as a buffer to Himley Plantation and associated ecology. A series of children's outdoor educational activities and natural play trails would be dispersed around area, which would be close to the new primary school (if brought forward as part of the proposals) and be accessible via a series of new footpaths.



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