

# SOUTH STAFFORDSHIRE LOCAL PLAN 2023-41 PUBLICATION PLAN

LAND AT THE STRAITS



## CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	DEVELOPMENT STRATEGY	2
3.	SITE ALLOCATIONS	7
4.	LAND AT THE STRAITS	8
5.	CONCLUSION	17

APPENDIX 1: Site Location Plan

APPENDIX 2: Landscape, Visual & Green Belt Appraisal

APPENDIX 3: Illustrative Concept Plan



# 1. Introduction

- 1.1 This representation, submitted on behalf of Bloor Homes Ltd, responds to the revised Regulation 19 'Publication Plan' consultation document and accompanying published evidence, having regard to the national and local planning policy context. It relates specifically to Land at The Straits where Bloor Homes has secured land interests. A site location plan is attached at **Appendix 1**.
- 1.2 The representations are framed in the context of the requirements of Local Plans to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Development Plan to be sound it must be:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - **Effective** – deliverable over the Plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.
- 1.3 These representations also give consideration to the legal and procedural requirements associated with the plan-making process.

## 2. Development Strategy

2.1 Bloor Homes supported Spatial Housing Option G (the Council's Preferred Option) identified through the previous Strategic Housing Strategy and Infrastructure Delivery consultation undertaken in 2019. It is noted the proposed strategy now represents a refinement of Spatial Housing Option C, focusing directing growth to the most sustainable villages. Spatial Housing Option C broadly reflects the approach in the adopted Core Strategy.

### Policy DS1: Green Belt

2.2 In terms of the strategic approach to the Green Belt there is an acknowledgement within the Local Plan that there needs to be changes to the Green Belt boundary to accommodate growth requirements within the Plan period. It is agreed that Green Belt release is necessary to deliver a sustainable spatial strategy.

2.3 Bloor Homes agrees that exceptional circumstances exist for Green Belt release within the district to allow for sustainable development within the plan period.

2.4 The Publication Plan recognises that the character of South Staffordshire is directly influenced by the fact that around 80% of the district lies within the West Midlands Green Belt. The rural nature of the district also results in a lack of brownfield opportunities to meet any future housing needs beyond the proposed plan period.

### Policy DS4: Development Needs

2.5 Bloor Homes generally supports the policy approach set out in Policy DS4 Development Needs however further commentary is set out below in respect of different components of the housing requirement arrived at.

### *Local Housing Need*

2.6 The Strategic Housing Market Assessment (SHMA) 2021 sets out a minimum housing requirement of 254 dpa based on the Government's standard method, utilising the 2018 Affordability Ratios. Bloor Homes welcomes the publication of a SHMA update in 2024 which reconsiders the minimum housing requirement having regard to the latest Affordability Ratios (2022) which results in a minimum net annual requirement of 227 dwellings.

2.7 The PPG is clear however that the standard method identifies a minimum annual housing need figure and does not produce a housing requirement figure



recognising there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

2.8 Paragraph 010 of the PPG (ID: 2a-010-20201216) states:

*“Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;”*

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

2.10 These circumstances are considered in further detail below.

#### *Unmet Need from Neighbouring Authorities*

2.11 The unmet housing need arising from within the wider Greater Birmingham and Black Country Housing Market Area is well documented.

2.12 The Birmingham City shortfall was tested through the BDP EiP and an unmet housing need to 2031 of 37,900 homes was confirmed. Birmingham City Council has now commenced a review of the Birmingham Development Plan, with an Issues and Options consultation recently published. The Issues & Options document recognised that the BDP was unable to identify enough land to meet all of Birmingham’s housing need and there is still a need to work with neighbouring authorities within the Housing Market Area (HMA) to deliver a housing shortfall. Birmingham City Council has identified a shortfall of around 78,415 dwellings following an assessment of potential capacity from all sources. While this figure will be refined through Birmingham’s plan making process, the shortfall to 2042 will remain significant.

2.13 The Black Country LPAs, were until this Autumn, undertaking a review of the Black Country Plan which is aligned to the timescales of the South Staffordshire Local

Plan review. Evidence that informed the emerging Black Country Local Plan includes an urban capacity assessment. The Urban Capacity Review (2019) concluded that the amount of housing need which cannot be accommodated in the Black Country urban areas remained significant, at around 26,920 homes to 2038.

- 2.14 The Draft Black Country Plan 2018-2039, subject to consultation in 2021, identified a shortfall of 28,239 homes to be exported to neighbouring LPAs through the Duty to Co-operate.
- 2.15 The shortfall figures above do not take into consideration the 35% urban uplift introduced in December 2020 which would be applicable to both Birmingham and Wolverhampton.
- 2.16 The Black Country LPAs took a decision to abort the joint plan-making approach to instead progress separate Local Plans.
- 2.17 The individual Black Country Authorities are now preparing their own Local Plans. Wolverhampton City Council consulted on a Regulation 18 Consultation Plan (dated February 2024) which identified a potential 11,413 dwellings shortfall. Sandwell Council held a Regulation 18 consultation ending in December 2023 which estimated around a 18,000 dwellings shortfall. Dudley Council also held a Regulation 18 consultation ending in December 2023 which estimated around a shortfall of 1,078 dwellings. It is Walsall Council's intention to proceed under new arrangements of plan making.
- 2.18 Bloor Homes supports the Council in providing a contribution to assist in meeting these unmet needs, however, raises concerns that this is not evidence based. The capacity-led approach, resulting in a contribution of 640 home contribution to the shortfall, will need to be explored and tested through the Examination in Public with neighbouring LPAs.

### *Economic Uplift*

- 2.19 The SHMA sets out the broad economic consequences of the projected growth in Chapter 5. This references the Economic Development Needs Assessment (EDNA). The EDNA Update 2024 forecasts an additional 5,326 net additional jobs in South Staffordshire over the period 2020-2041. This compares to the 4,824 jobs within the district between 2020 and 2040 identified in the previous EDNA. This forecast is based upon methodologies of two of three forecasting houses that do not provide the basis to identify significant growth in the transport and storage sector.

- 2.20 The number of jobs to be created within South Staffordshire is likely to significantly exceed the 5,326 jobs forecast by virtue of committed development at the West Midlands Interchange (WMI) which will provide significant growth in the transport and storage sector. The WMI itself is projected to create 8,500 jobs of which 40% will be higher skilled.
- 2.21 At present the SHMA assumes that the projected growth of the working age population in South Staffordshire will grow by just 1,012 people between 2023 and 2041. This is significantly lower than the forecast jobs growth outlined in the EDNA. Further consideration should therefore be given to whether the minimum local housing need figure derived from the standard method would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth, even taking into consideration the 640 additional homes to meet unmet needs in the wider housing market area.
- 2.22 Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand. This may require an uplift in local housing needs identified.
- 2.23 **Policy DS5: The Spatial Strategy to 2041**
- 2.24 Bloor Homes supports the proposed spatial strategy to 2041 which recognises environmental capacity and seeks to make best use of existing infrastructure whilst recognising opportunities to delivery new infrastructure.

### *Settlement Hierarchy*

- 2.25 Bloor Homes supports the settlement hierarchy which considers the relative sustainability of villages within South Staffordshire District. The Tier 1 and Tier 2 settlements identified contain the widest range of services and facilities and by focusing new homes to these settlements would provide an opportunity to increase sustainability and self-containment. Codsall/Bilbrook and Penkridge appear to achieve the highest services/facilities rankings of all villages within the district.
- 2.26 While the Rural Services and Facilities Audit does not consider locations adjacent to other adjacent towns and cities, these locations should be recognised as sustainable locations for growth.

### *Spatial Distribution of Housing Growth*

- 2.27 Bloor Homes supports the distribution of housing growth to meet locally derived housing need by directing proportionate growth to the most sustainable

villages, however any contribution to meet identified unmet needs arising from the Black Country should be focused to the edge of conurbation to meet need where it arises.

- 2.28 Bloor Homes notes the GBBCHMA Strategic Growth Study recommended the broad location to the west of the Black Country is capable of accommodating dispersed housing growth of between 500 and 2,500 dwellings. The emerging spatial development strategy fails to identify any sites in this broad location.

### 3. Site Allocations

- 3.1 Bloor Homes has a number of land interests within South Staffordshire District. This representation relates to Land at The Straits.

#### Policy SA3: Housing Allocations

- 3.2 Bloor Homes is promoting Land at The Straits (Site Ref: 560 and 566) for residential development. These two sites, that comprise Land at The Straits, are suitable, available and achievable and should be considered if it is determined through the Examination in Public that omission sites are necessary to make the Local Plan sound.

## 4. Land at The Straits

- 4.1 This Chapter sets out a brief description of Land at The Straits, followed by an assessment of the site against each of the Council's site selection criteria, as defined within the Housing Site Selection Topic Paper 2024 and preceding site assessments published in 2021 and 2022.
- 4.2 Bloor Homes control two areas of land at The Straits. The first is located to the north west of Sandyfields Road and to the south of Baggeridge Country Park (Site 560). The other site is located to the west of The Straits and to both the north and south of High Arcal Road, Dudley (Site 566). Site Location Plans for both parcels are included at **Appendix 1** to this representation. This representation is also accompanied by a Landscape, Visual and Green Belt Appraisal (**Appendix 2**) and an Illustrative Concept Plan (**Appendix 3**) which demonstrate how the sites may come forward as a comprehensive development.
- 4.3 A brief assessment of both parcels of land is included below, having regard to the Council's site selection methodology.

### Site Description

#### *Land North of Sandyfields Road (Site 560)*

- 4.4 The site comprises approximately 18.2 ha of land, located to the north-west of Sandyfields Road and to the south of Baggeridge Country Park, Dudley. Whilst the site is located within South Staffordshire District, it shares a functional relationship with the Black Country conurbation.
- 4.5 The site is made up of a number of agricultural field parcels, accessed from Sandyfields Road. The parcels are subdivided by existing tree/hedgerow boundaries associated with the agricultural use of the land. The site is identified as Grade 3 (good to moderate) / Grade 4 (poor) quality agricultural land and therefore does not represent best and most versatile land (BMV).
- 4.6 Land at Sandyfields Road lies within the Green Belt but is adjacent to the current development boundary of Dudley. As such, development of the site would be subject to its release from the Green Belt. The site is located in Flood Zone 1, the area at least risk from flooding. The site is relatively flat, rising from the south-western corner upwards towards the north-eastern site boundary. The topography rises steeply beyond the north-western site boundary towards Baggeridge Country Park.

### *Land West of The Straits (Site 566)*

- 4.7 The site comprises of land, located to the west of The Straits and to both the north and south of High Arcal Road, Dudley. Whilst the site is located within South Staffordshire District, it shares a functional relationship with the Black Country Conurbation.
- 4.8 The site is made up of a number of agricultural field parcels, accessed from High Arcal Road. The parcels are subdivided by existing tree/hedgerow boundaries associated with the agricultural use of the land.
- 4.9 The site lies within the Green Belt but is adjacent to the current development boundary of Dudley. As such, development of the site would be subject to its release from the Green Belt. The site is located in Flood Zone 1, the area at least risk from flooding. The site is relatively flat, rising from the southern boundary to the northern boundary.

### *Proposal*

- 4.10 The residential-led proposal includes the following key features across both parcels:
- The delivery of approximately 600-650 new homes (approximately 750 including additional land to the south)
  - Access into the northern parcel would be achieved via two primary points of access and a third emergency access off Sandyfields Road. The central parcel would be accessed via a single access point off High Arcal Road and the southern parcel via two points of access off High Arcal Road;
  - The opportunity for the delivery of a primary school close to the existing settlement edge and primary access road to ensure accessibility;
  - A Green Infrastructure Strategy that incorporates open parkland providing an attractive setting to Himley Hall Registered Park and Garden and new linear parklands;
  - Provision of a new car park to serve Baggeridge Country Park; and
  - New equipped children's play areas.

## Sustainability Appraisal (SA) Findings

- 4.11 The Council's Sustainability Appraisal (2024) provides an assessment of sites both pre and post mitigation and provides assessment of reasonable alternatives against the SA Objectives.
- 4.12 It is noted that the Sustainability Appraisal concludes Land North of Sandyfields Road (Site 560) is one of the highest scoring sites appraised against SA Objective 2 (Climate Change Adaption) and SA Objective 11 (Education).
- 4.13 The Housing Site Selection Topic Paper references the major positive impact against the criteria for Site 560 due to new residents' access to both primary and secondary education. The comprehensive proposal for The Straits provides opportunity for the provision of a new primary school and therefore a major positive impact should also be afforded to Site 566.
- 4.14 The Sustainability Appraisal notes the sites are of lower Green Belt harm than the majority of land in this broad location. Bloor Homes agrees with this conclusion.
- 4.15 The Sustainability Appraisal however concludes a higher landscape sensitivity for both sites compared with the majority of land in the broad location. This conclusion is contended by Bloor Homes who has commissioned a Landscape, Visual & Green Belt Appraisal (**Appendix 2**) to review landscape sensitivity. This appraisal determines a low-moderate sensitivity would be a more appropriate rating for both sites. This is discussed further below.

## Sequential Test

- 4.16 The Council's spatial development strategy identifies an infrastructure led approach to growth. Bloor Homes agrees that additional growth is required in an area of search for urban extensions on the western edge of the Green Belt with the plan period and beyond and that non-Green Belt options available are insufficient to address housing need.
- 4.17 Green Belt release is justified.

## Green Belt Harm

- 4.18 The sites lie within the West Midlands Green Belt, adjacent to the current built up area of The Straits and within walking distance of its many facilities and bus links.



- 4.19 The Council's Green Belt Assessment (2019) indicates that should Green Belt to the east and west of High Arcal Road (Sub-Parcel ref: S71Bs2) be released for development, the resulting harm would be 'moderate-high', stating:

*"The sub-parcel makes a strong contribution to preventing encroachment of the countryside and sprawl of the large built-up area. To the north of Himley Road, there is no separation between the sub-parcel and inset settlement at The Straits, and woodland provides strong containment from the wider countryside. This area could therefore be released without weakening the Green Belt boundary."*

- 4.20 The Study goes on to identify that, should land to the north of Sandyfields Road (Green Belt Sub-Parcel ref: S71Cs2) be released for development, the resulting harm would be 'moderate-high', stating:

*"The sub-parcel makes a strong contribution to preventing encroachment of the countryside and sprawl of the large built-up area. Adjacent to The Straits, woodland contains the southern end of the sub-parcel, so this area could be released with negligible impact on the Green Belt boundary or the integrity of the wider Green Belt."*

- 4.21 Bloor Homes consider that the final conclusions in respect of these parcels, in relation to the potential harm that would arise from development are overstated given the assessment criteria and site analysis that is presented within the study. It is contended that a 'moderate' harm rating would be more accurate. Further justification of this conclusion is set out within the accompanying Landscape, Visual & Green Belt Appraisal attached as **Appendix 2**.

- 4.22 The South Staffordshire Green Belt Study concludes that the site is one of the least critical parts of the Green Belt on the edge of the Black Country Urban Area when assessed against the purposes set out in the NPPF. Indeed, whilst some harm would (inevitably) arise from the extension of the urban form into what is currently countryside, the site's relationship with the urban area, the presence of urbanising elements and the containment provided by the surrounding framework mean that the result harm would be minimised, certainly in comparison to other locations on the edge of the Black Country. Moreover, further mitigation can be provided through the carefully considered masterplanning of the site's development that will provide a logical form of development set within an integrated Green Infrastructure network.

- 4.23 The Council's own Green Belt Study and the site-specific appraisal appended to this representation demonstrate that the Green Belt harm of both sites are lower

than those that relate to the Council's preferred allocation on the western edge of the Black Country.

### Landscape Harm

- 4.24 The South Staffordshire Landscape Sensitivity Assessment provides an update to previous landscape sensitivity assessments undertaken by the Council in 2015 and 2017. Land to the north of Sandyfield Road is assessed within a larger parcel extending northwards towards Penn Common (SL16) and land to the north and south of High Arcal Road is included within a smaller, stand-alone parcel (SL15).
- 4.25 The assessment for SL15 concludes that: *"The area has varied sensitivities relating to visual prominence and valued natural features and landscape pattern/time depth. Overall the area is considered to have moderate-high sensitivity to residential development as the majority of the criteria are moderate or high."*
- 4.26 Bloor Homes would contend that for the majority of criteria, SL15 is rated 'low-moderate', and there is no indication that explicit weighting has been given to any of the higher sensitivities. Therefore, a low-moderate sensitivity would be a more appropriate rating.
- 4.27 The assessment for SL16 concludes that: *"Despite the presence of some modern development and human influences, the landscape area is considered to have moderate - high overall sensitivity to residential development as it retains a small scale, scenic and historic rural character, including an intact mature hedgerow network, which all contribute positively as a backdrop to adjacent settlements."*
- 4.28 Bloor Homes contend, that whilst the site does include some of the features identified within the assessment, the ratings in the table show more of a weighting towards low-moderate; particularly when taking into account the site's position on the southernmost edge of the area and its distance from Sedgley and Gospel End.
- 4.29 Further consideration of the landscape and visual context for The Straits is set out in a Landscape, Visual & Green Belt Appraisal attached as **Appendix 2**.
- 4.30 The Illustrative Concept Masterplan, attached as **Appendix 3**, responds to the landscape and visual context through the incorporation of a number of features:
- A robust landscape buffer, incorporating native tree and shrub planting, SuDS and grassland softens views of the development edge and provides separation from Baggeridge Country Park and White's Wood.

- Linear parklands within the site intersect with retained hedgerow corridors as part of a strong green infrastructure network and incorporate the HSE inner and middle zones for the gas main and overhead powerlines.
- Existing hedgerows will be retained within the development where possible. As well as providing the basis for green corridor links across the development they will help to integrate the proposed development into the existing landscape.
- The school site will be located in the south west corner where it is easily accessible by the surrounding communities but also form part of an open space buffer alongside Miners Walk.
- Proposed development will be carefully arranged on the highest parts of the site to minimise visual impact. This may include the use of single storey properties to reduce the scale of development in some locations.
- Open space maintained as backdrop to localised view from the Toposcope in Baggeridge Country Park.
- Strengthen belts of tree planting along the site perimeter to strengthen the existing landscape structure and help to screen the development in views from the surrounding area.
- Access road orientated along the view to the chimney stack within Baggeridge Village when entering the site to the north off Sandyfields Road.
- East facing slope kept open to maintain sense of separation from edge of Sedgley and minimise harm to the Green Belt.
- An open parkland area provides an attractive setting to Himley Hall Registered Park and Garden. Strategically placed tree planting and roadside hedgerows will help to frame views and filter the proposed housing edge.
- Buildings arranged to present a more sympathetic frontage to the settlement edge in views from High Arcal Road.
- SuDS and open space provide a buffer between the development edge and the adjacent wildlife site.

## Impact on the Historic Environment

- 4.31 The HESA sets out a RAG assessment for all sites against potential harm to the historic environment. It is noted that both sites are scored green for potential direct harm and amber for potential indirect harm.
- 4.32 There are no designated heritage assets within the sites, however, it is recognised that land north of High Arcal Road abuts the boundary of the Grade II Registered Himley Hall Park and Garden. The Grade II\* Listed Himley Hall is located approximately 1km west of the site.
- 4.33 The contribution of the proposal site to the setting of Himley Hall is considered to be negligible and has been diminished by the establishment of Himley Golf Course, which visually and materially divides the Hall from its historic farmland to the east, and the fact the historic eastern approach to the Hall is no longer extant. Moreover, there is no intervisibility between Himley Hall and the site.
- 4.34 Whilst land to the north and south of High Arcal Road once formed part of the wider agricultural landholding associated with the Registered Park and Garden, the legibility of this historic association has been eroded by the creation of Himley Golf Course and the mineral railway. The only intervisibility between the site and the Registered Park and Garden is limited to glimpsed views between the easternmost area of the Registered Park and Garden and the northern element of the site to the north of High Arcal Road. Overall, the site is considered to make a very small contribution to the heritage significance of the Registered Park and Garden.
- 4.35 In summary, the technical work undertaken to date concludes there are no heritage constraints identified that would preclude the development of the site.
- 4.36 The Illustrative Concept Masterplan, attached as **Appendix 3**, has been informed by the constraints and opportunities that this designated heritage asset presents and seeks to offer potential enhancement to the current landscape in which it is experienced.

## Surface Water Flooding

- 4.37 The sites lie within Flood Zone 1 which has the lowest probability of flooding.
- 4.38 A Sustainable Drainage Strategy (SuDS) is proposed:
- To efficiently drain the site whilst not causing flooding downstream, including the school site;

- To create suitable habitats to promote biodiversity;
- To create ecological corridors across the site;
- To create an aesthetically pleasing setting for development; and
- To promote the site as a sustainable place to live and work.

## Highways

- 4.39 The sites are well served by public transport and a number of local services and facilities are within a short walking and cycle distance or short public transport journey from the site. The site would therefore be well placed to ensure that future residents would have excellent sustainable access to a diverse range of services and facilities.
- 4.40 Access into the northern parcel would be achieved via two primary points of access and a third emergency access off Sandyfields Road. The central parcel would be accessed via a single access point off High Arcal Road and the southern parcel via two points of access off High Arcal Road.
- 4.41 A Public Right of Way (PRoW) passes along the northern boundary of the northern parcel providing access into Baggeridge Country Park. Development of the site provides the opportunity to form new pedestrian links within the site and enhance the existing footpath network.
- 4.42 As the sites are well related to the existing urban area all proposed connections will ensure new and existing services and facilities are accessible to all.
- 4.43 Bloor Homes notes the SCC Highways view that both sites are OK in principle subject to highway improvements.

## Site-Specific Opportunities

- 4.44 As set out previously within this representation, the development of the site for residential purposes presents the opportunity to deliver a new Primary School.
- 4.45 A new car park to the country park is incorporated within the scheme, located along the development edge and benefiting from convenient access to the open space and footpath network and potential links to existing footpaths beyond the site to the north.
- 4.46 A number of linear parkland areas are proposed to form a strong green infrastructure network incorporating existing hedgerows and trees.

- 4.47 A variety of equipped children's play areas are incorporated within the green infrastructure network, promoting formal and informal recreational opportunities throughout the site.

#### Suitability

- 4.48 The information set out above, read in conjunction with the appended Illustrative Concept Masterplan and the Landscape, Visual & Green Belt Appraisal, demonstrates that land at The Straits is a suitable proposal.

#### Deliverability

- 4.49 There is an agreement in place between the landowner and Bloor Homes to facilitate the development of the site.
- 4.50 Bloor Homes intends to undertake further technical work to demonstrate the deliverability of land at The Straits, however information gathered to date concludes that there are no physical or other constraints likely to render the site undeliverable within the proposed Plan period to 2041. The site is available now.
- 4.51 The Bloor Homes is a national housebuilder with no funding or capacity constraints and the site is an area of high market demand. The site is deliverable and immediately available and, subject to allocation and removal of the land from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years.

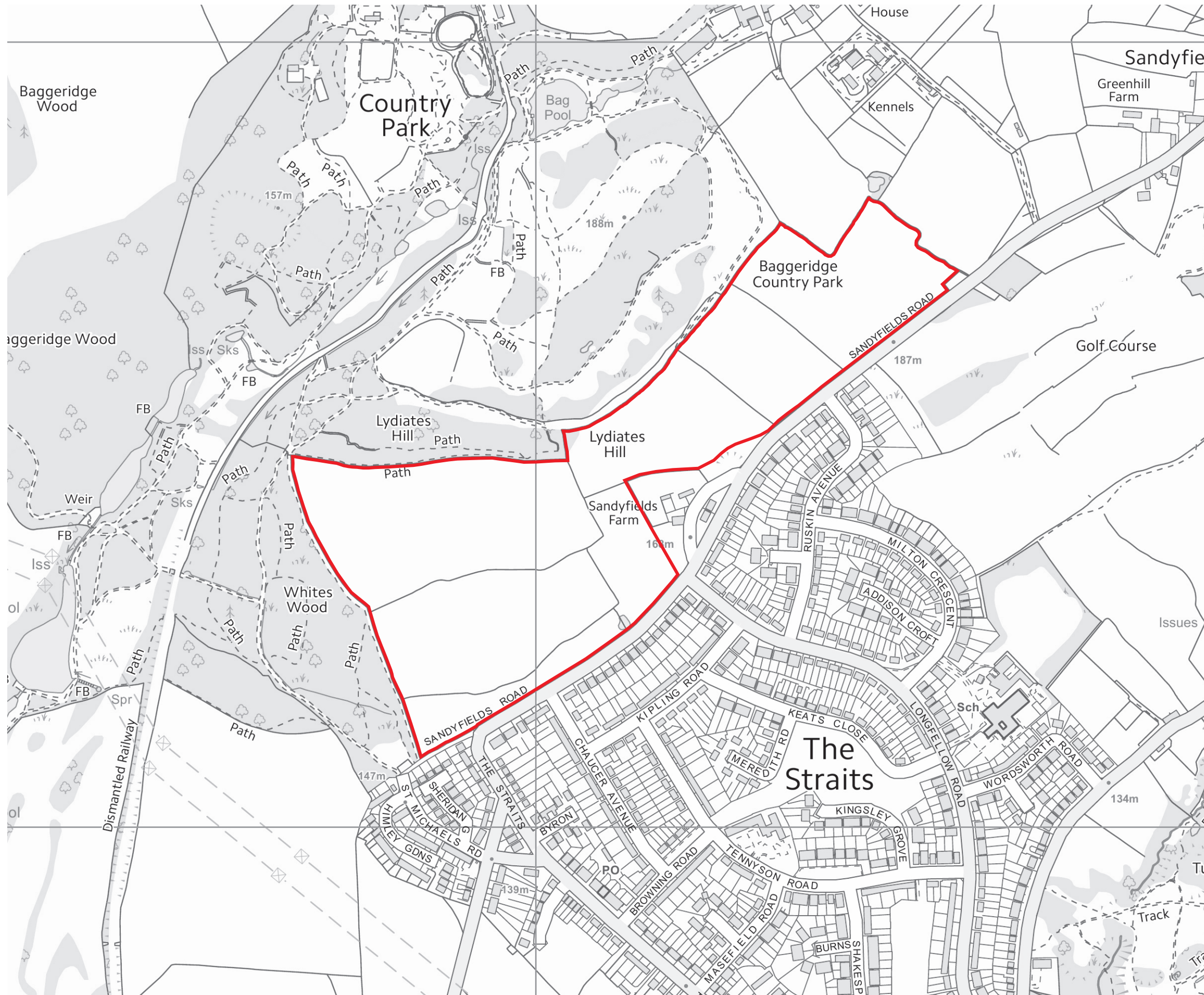
## 5. Conclusion

- 5.1 This representation is made by Evolve Planning on behalf of Bloor Homes to the South Staffordshire Local Plan Review, revised Publication Plan (Regulation 19) consultation. This representation relates to land at The Straits, which Bloor Homes is promoting for residential-led development.
- 5.2 The information contained within this representation, read in conjunction with the appended illustrative concept plan and the Council's published evidence base demonstrates that Land at The Straits is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 5.3 There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the potential impacts of the development of the site can be mitigated through design and in many cases a positive outcome can be achieved.
- 5.4 It is submitted that Land at The Straits represents a sound strategic housing allocation and should be considered if, through the Examination in Public process, omission sites are required to make the Local Plan sound.

# APPENDIX 1

## Site Location Plan



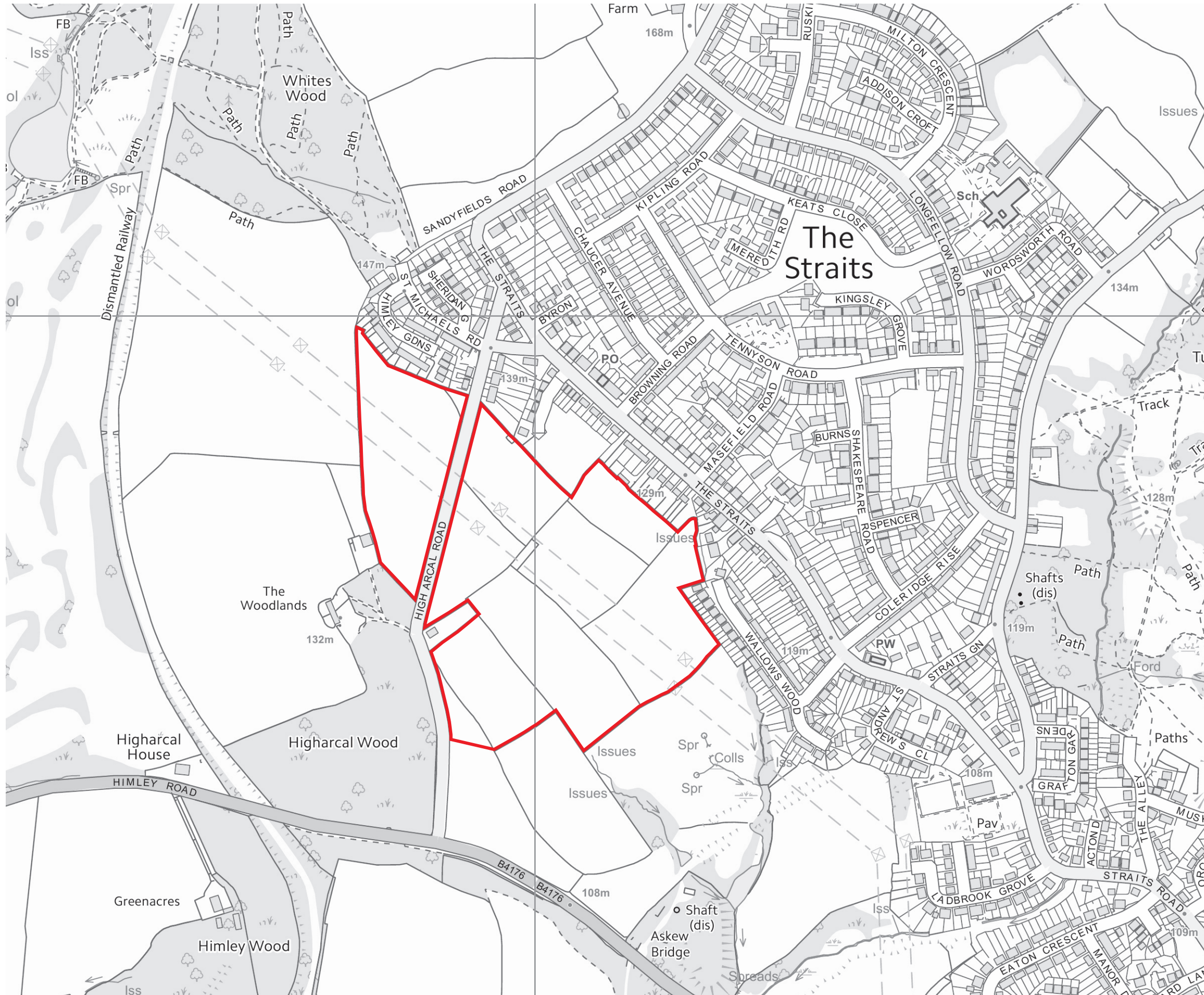


 SITE BOUNDARY  
19.2 hectares



**LAND NORTH OF SANDYFIELD ROAD, THE STRAITS | SITE LOCATION**





SITE BOUNDARY  
13.4 hectares



**LAND WEST OF THE STRAITS | SITE LOCATION**

# APPENDIX 2

## Landscape, Visual & Green Belt Appraisal

LAND AT  
THE STRAITS  
Dudley



LAND NORTH OF SANDYFIELDS ROAD & EAST/WEST OF HIGH ARCAL ROAD



# Introduction

## PURPOSE

This is a high-level landscape, visual and Green Belt appraisal for a residential development opportunity on land at The Straits (Land North of Sandyfields Road and East/West of High Arcal Road), which has informed an evolving Masterplan for the site. This will seek to highlight the merits of the land for potentially forming a key part of the spatial development strategy in the new South Staffordshire Local Plan.

## THE SITE

The site is formed of three parcels of land: c.19ha to the north of Sandyfields Road (northern parcel), c.3ha to the west of High Arcal Road (central parcel) and c.10.5ha to the east of High Arcal Road (southern parcel), and comprises areas of grassland bisected by hedgerows. To the north, hedgerow corridors contain more trees and generally offer a greater degree of screening, whereas to the east they are largely managed hedgerows containing occasional trees; land to the west is a single paddock.

The northern parcel is bound to the south by a mature tree lined hedgerow on Sandyfields Road and a small cluster of dwellings forming a small crescent off Sandyfields Road. Beyond Sandyfields Road lies the residential suburb of The Straits and Sedgley Golf Club. The wooded Lydiates Hill and Baggeridge Country Park border the site to north and agricultural land extends beyond the site to the east. To the west the site boundary is defined by Whites Wood.

The central parcel is bound to the north by rear private gardens of residential development on Himley Gardens and the side boundary of the adjacent property on High Arcal Road. High Arcal Road defines the site boundary to the east and Higharcal Wood borders the site to the south. The boundary of Himley Hall Registered Park and Garden, denoted by a dilapidated wall, fencing and trees, defines the site boundary to the west.

The southern parcel is bound to the north by rear private gardens of residential development on The Straits, Majors Fold and Wallowswood, and the side boundary of the adjacent property on High Arcal Road. Further agricultural land and woodland lies beyond the site to the east and south, and High Arcal Road defines the site boundary to the west.

## THE STRAITS

The Straits is a largely residential suburb to the west of Dudley and contains a number of local facilities, such as The Straits Primary School, Happy Hours Day Nursery, and a small local centre comprising a Post Office / newsagents, hairdressers, beauty salon and independent shops. It also benefits from a regular bus service to / from Dudley and Wolverhampton, passing through Lower Gornal, Gornal Wood, Sedgley, Goldthorn Park, and Blakenhall, where a wide range of local facilities and services are available.

Baggeridge Country Park, a 150 acre parkland to the north west of The Straits, and Cotwall End Local Nature Reserve, a Site of Importance for Nature Conservation (SINC) to the east of The Straits, provide extensive recreational opportunities within the locality, as well as an easily accessible network of public rights of way within the wider landscape. Baggeridge Craft and Enterprise Park, to the north of Baggeridge Country Park, also offers nearby employment opportunities.



Local Centre in The Straits



Chimney is a local landmark on the edge of Baggeridge Country Park



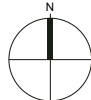
Housing development at The Straits



Figure One  
**THE SITE**

LEGEND

 Site Boundary





# Landscape & Visual Appraisal

## LANDSCAPE CHARACTER

The site and surrounding area forms part of the 'Cannock Chase and Cankwood' Regional Character Area (RCA) as referred to in the Staffordshire County Council (SCC) "Planning for Landscape Change" SPG (adopted in 2001). The RCA is an extensive Character Area is characterised by carboniferous coal measures, overlain by glacial drift and stagnogley soils. It stretches northwards into central Staffordshire, with its north eastern and eastern boundaries sharply defined by the Trent and Tame Valley; the western boundary follows the River Penk and to the south merges with the West Midlands conurbation.

Within that RCA, the site is set within the 'Sandstone Hills and Heaths' Landscape Character Type (LCT) located on the eastern fringes of Staffordshire (to the west of Dudley). To the east of the site the landscape merges into the adjacent 'Sandstone Estatelands' LCT, that forms the southern boundary of the nearby village of Wombourne, as demonstrated by Figure 2.

Some of the distinctive features of the 'Sandstone Hills and Heaths' LCT of relevance to the site and study area include:

- Generally dispersed settlement pattern with expanded hamlets;
- Pastoral farmland characterised by an irregular, largely intact pattern of small-scale fields;
- Areas of intensive arable farming associated with gappy hedges with declining hedgerow trees;
- Undulating landform deeply cut by stream valleys resulting in views across to neighbouring landscapes;

- Continual removal of trees and hedgerows in the areas of intensive arable farming emphasises the strongly rounded landform;
- Urban influence is very great with built up areas visible and farm cottages improved;
- Small roads are all very well used, giving the impression of an area that is travelled through by large numbers of people.

The site and its immediate surroundings display many of the typical characteristics identified within the 'Sandstone Hills and Heaths' LCT. There is a mix of farmland types, with smaller more enclosed fields adjacent to the settlement edge giving way to larger arable fields further to the west and north west. Urbanising impacts are provided by the neighbouring residential edge to the south and east and the dispersed settlements of Gospel End, Himley and Wombourne are in the immediate surrounding area.

The site is also located within a Landscape Policy Zone for 'Landscape Maintenance', as shown on Figure 2. In these areas, the SPD states that '*substantial emphasis should be placed on ensuring that the development blends unobtrusively into the landscape and does not lead to the loss of features characteristic of it.*'

The character of the 'Sandstone Estatelands' LCT to the west marks a transition towards a more rural LCT that is present beyond the site and immediate surrounding area. This LCT is comprised of woodlands and parklands of traditional rural estates characterised by the more intact parts of the rolling lowland landscape. The landform here is gently undulating and this, coupled with the scarcity of hedgerow trees, results in wide expansive views through the landscape into the distance.

South Staffordshire Council have also produced a Design Guide SPD (2018) to help promote good design in new development. The general design principles identified within the Design Guide that relate to Landscape Character and are of relevance to the proposed site include;

- The siting and location of new major residential developments should take account of the characteristics and sensitivity of the landscape and its surrounding;
- Landscape and open space should be an integral part of the scheme's design, complementing and enhancing the development and the wider area;
- Establish what the character is through an appraisal of the site and its surrounding landscape or village;
- Safeguard and enhance the setting of valued features and protect and enhance landscape / village character; and
- Contributing to the surrounding character: creating links between natural areas, creating views to natural elements outside the development.

The recently published South Staffordshire Landscape Sensitivity Assessment (SSLSA0- July 2019) effectively updates the previous landscape sensitivity assessments undertaken in 2015 and 2017. It is intended to inform the Local Plan for South Staffordshire and notably the selection of development allocation sites.



Within the SSLSA, the northern part of the site is included within a larger area extending northwards towards Penn Common (SL16) and the southern part is included within a smaller, stand-alone parcel to the south (SL15). This is shown on Figure 3. Within the assessment,








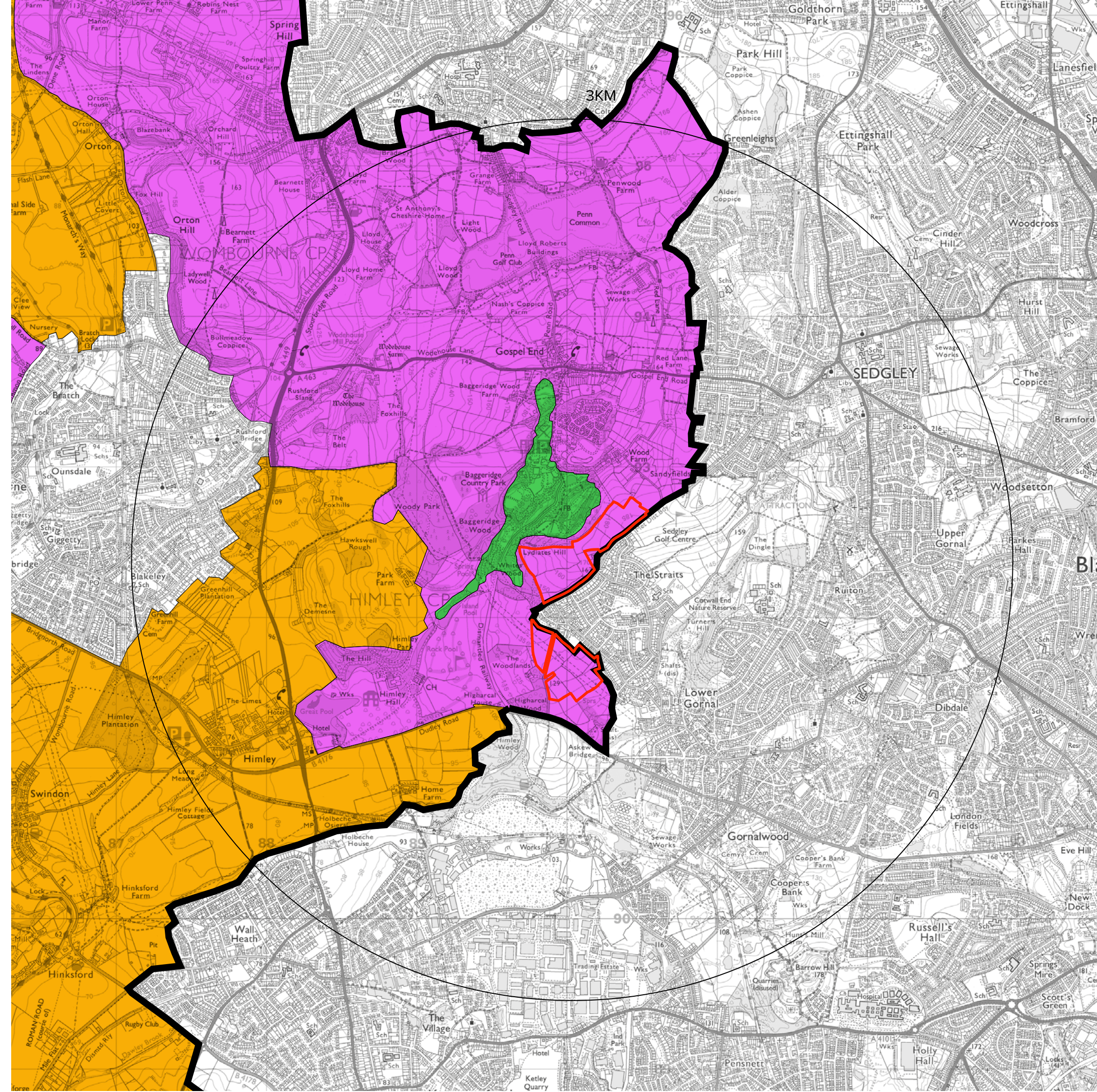
Figure Two  
**LANDSCAPE  
 CHARACTER CONTEXT**

**LEGEND**

-  Site Boundary
-  Authority Boundary

**STAFFORDSHIRE COUNTY COUNCIL  
 'PLANNING FOR LANDSCAPE CHANGE' SPG  
 (Adopted 2001)**

-  Sandstone Hills and Heaths
-  Sandstone Estatelands
-  Baggeridge Country Park (LNR)





it acknowledges that South Staffordshire areas located alongside the West Midlands conurbation often have a lower sensitivity to development than the rural villages within the district (due to the urbanising influences exerted by the proximity of the conurbation). However, it also suggests that the influence of the adjacent historic landscape at Himley Hall Registered Park and Garden may increase sensitivity to development in some areas (with SL15 and SL16 specifically referenced within the assessment).

The site is not subject to any designations other than Green Belt, and is not covered by any “absolute constraints” (those areas where the presence of known planning constraints mean development would not be permitted). While parts of the immediately surrounding area, including Himley Hall Registered Park and Garden, Baggeridge Country Park and Wallowswood Pastures SBI, do constitute “absolute constraints”, these lie outside the boundaries of the site.

The appraisal of each area’s landscape sensitivity to built development is summarised in the table below together with additional comments (where appropriate) in relation to the site’s specific role.

The assessment for SL15 concludes that: “The area has varied sensitivities relating to visual prominence and valued natural features and landscape pattern/time depth. Overall the area is considered to have moderate-high sensitivity to residential development as the majority of the criteria are moderate or high.”

However, the ratings (as shown in the table) show that the majority of criteria are low-moderate, and there is no indication that explicit weighting has been given to any of the higher sensitivities. Therefore a low-moderate sensitivity would be a more appropriate rating.

The assessment for SL16 concludes that: “Despite the presence of some modern development and human influences, the landscape area is considered to have moderate - high overall sensitivity to residential development as it retains a small scale, scenic and historic rural character, including an intact mature hedgerow network, which all contribute positively as a backdrop to adjacent settlements.”

While the site does include some of the features identified within the assessment, the ratings in the table show more of a weighting towards low-moderate; particularly when taking into account the site’s position on the southernmost edge of the area and its distance from Sedgley and Gospel End.

Overall, a rating of Moderate-Low sensitivity is considered to be appropriate for both parts of the site (within SL15 and SL16) rather than the Moderate-High attributed within the assessment.

In considering whether the site forms part of a ‘Valued Landscape’, Box 5.1 of the “Guidelines for Landscape and Visual Impact Assessment” (3rd Edition) sets out the range of factors that can help in the identification of valued landscapes. The site mainly comprises of a number of grass paddocks on the edge of an existing settlement,

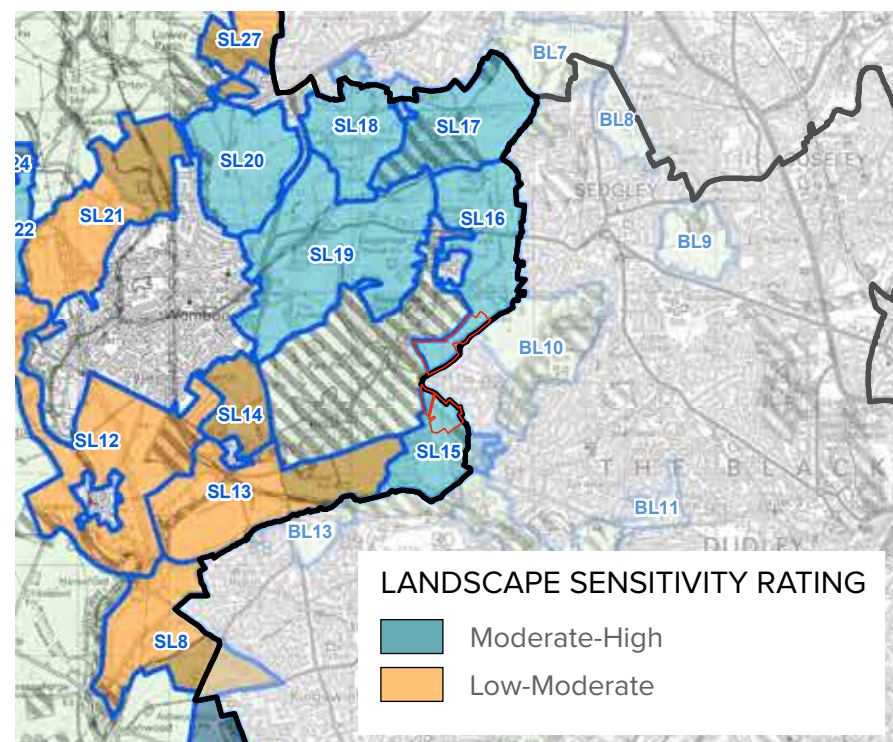
subdivided by mature trees and hedgerows. This is typical of the surrounding area and is considered to be of high quality (reflected by the Landscape Policy Objective in the SPG of “Landscape Maintenance”). It has limited scenic qualities and there are no known cultural associations, although it is adjacent to a Registered Park and Garden and a former colliery site (now a Country Park). Although it forms part of the setting of the Country Park and includes a number of mature trees and hedgerow boundaries, there is nothing within the site that elevates it enough to be considered a ‘valued’ landscape (as set out in paragraph 170(a) of the NPPF) and the site is not subject to any specific landscape designations.

In summary, residential development on the site would constitute moderate development on the edge of the existing conurbation, extending north and west, but would be contained by the surrounding land-uses, including woodland, the Himley Estate, the B4176 and Baggeridge Country Park. While the existing landscape structure is generally considered to be of high quality and is typical of the wider surrounding landscape character, there is an opportunity to retain many of the mature hedgerows and trees within the site to help integrate the proposed development and the existing settlement edge into the surrounding landscape.

The key landscape features of the site and immediately surrounding area are shown on Figure Four.

Figure Three & Table 1

## THE STRAITS LCP SENSITIVITY



Plan extracted from Landscape Sensitivity Study Update (2017) published by South Staffordshire Council (SSC).

























Characteristic/Attribute	SL15 Sensitivity*			Comments (where applicable)	SL16 Sensitivity*			Comments (where applicable)
	Lower	Moderate	Higher		Lower	Moderate	Higher	
Scale	o							
Landform								
Landscape pattern & time depth	o			Post medieval associations with the site.				
Natural character				Emphasis is on designated areas and woodlands near to the site. Site includes mature hedgerows and hedgerow trees.			o	
Built Character								
Recreational Character						o		
Perceptual Aspects								
Settlement Setting							o	The site only plays a minor part in the wider setting of Sedgley and Gospel End and the perceived gap between them.
Visual prominence				Although the site is on higher ground (and more visually prominent) so is the adjacent settlement edge.				
Inter-visibility with adjacent designated landscapes or promoted viewpoints								The assessment does not consider views from Baggeridge Country Park (or from the Toposcope within the Park).
<b>Total Scores</b>	<b>5</b>	<b>4</b>	<b>3</b>		<b>4</b>	<b>4</b>	<b>2</b>	

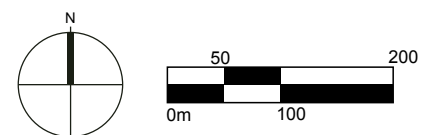
\*Sensitivity ratings taken from assessment. Ratings applying to specific features within the areas (and therefore not the site) have been excluded (such as those within SL15 relating to the former mineral working site south of Himley Road). Where a rating has been excluded it has been marked with a circle for reference.



Figure Four  
**SITE CONTEXT**

**LEGEND**

-  Site boundary
-  Existing vegetation
-  Notable woodland
-  Himley Hall Registered Park & Garden
-  Ancient Woodland
-  BAP Priority Habitat
-  Key local facility
-  Watercourse/body
-  Main road
-  Secondary road
-  Other road
-  Bridleway
-  Public footpath
-  Informal path
-  Nearby bus stop
-  Local landmark
-  2m contour
-  Viewing area
-  Key view
-  Filtered view
-  Tipton Auto / Haglay Gas Main & HSE zones
-  Gospel End / Dawley Gas Main & HSE zones
-  Sub station
-  Overhead powerline





## VISUAL AMENITY

The visual amenity of the site and its surroundings has been appraised through the preparation of a Zone of Theoretical Visibility (ZTV) and a consideration of key views (as presented on the following pages).

The ZTV considers the screening provided by the area's underlying topography. On this basis, the lighter areas represent locations where there may be a potential view of the site and the darker areas represent those areas where there may not. It shows that potential views of the site are likely to be mainly from the south and south west and immediately to the east, with intermittent coverage from the surrounding areas to the north and west (within 1.5km of the site) and limited coverage to the east (beyond 2km). However, fieldwork has shown that views from many of the locations to the north and west are limited by vegetation, particularly the trees and woodland surrounding Baggeridge Country Park and the Himley Estate, while many of the areas to the south and east are already populated by suburban housing areas which limit available views.

An appraisal of key views from public vantage points in the wider area, in particular those from the Country Park and nearby public rights of way, has been undertaken. Those selected are shown on the ZTV and are set out on the following pages. They look at the potential impact on views from:

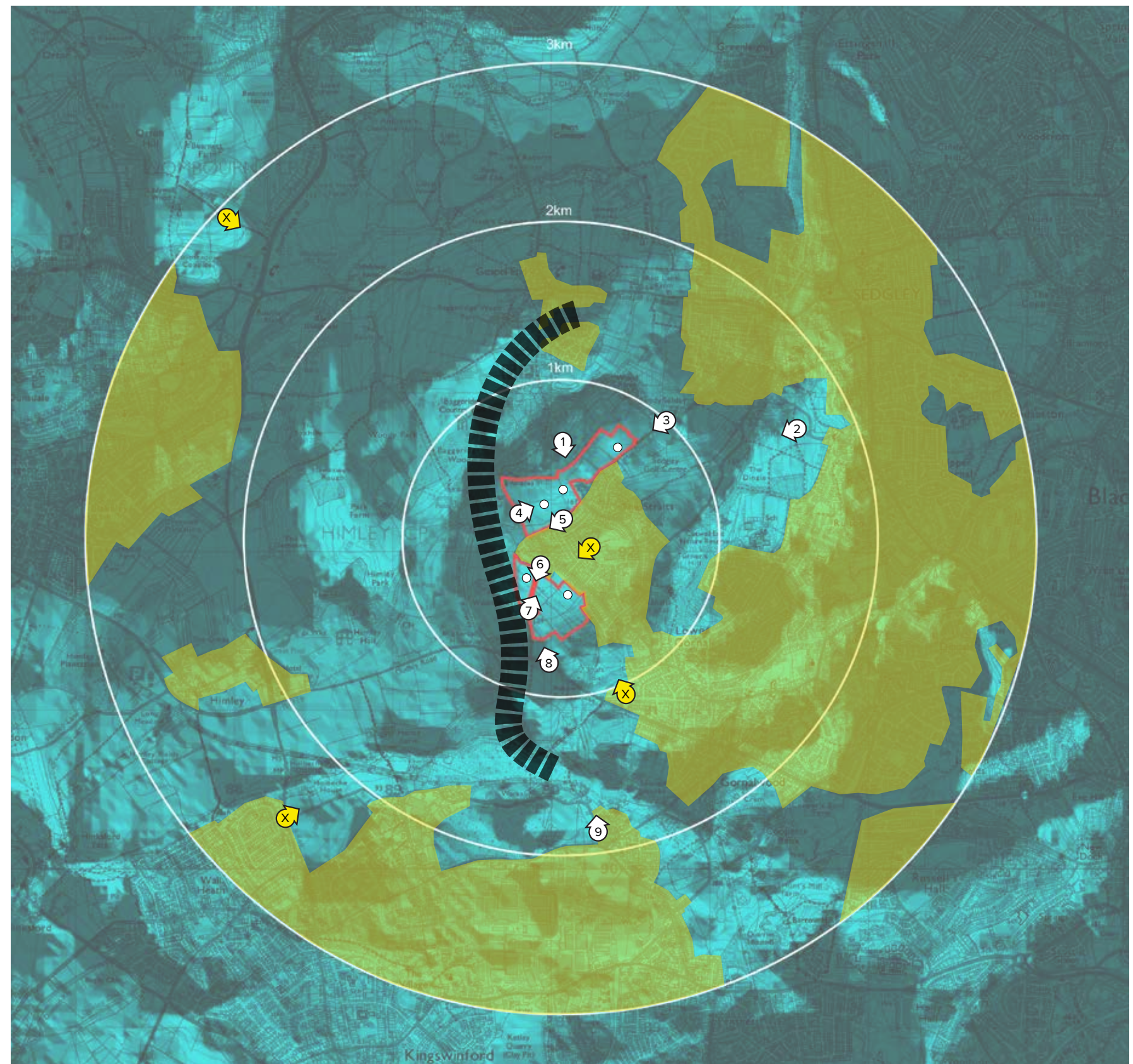
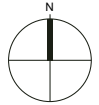
- key approaches into the housing area - from the north (on Sandyfields Road), from the south (on Himley Road / High Arcal Road) and from the east (within the Straits);
- public viewpoints within the Country Park and Miners Walk - a public footpath connecting the Country Park to The Straits;
- public rights of way to the east;
- the surrounding residential roads; and
- the rising ground to the south.

Development is inevitably going to be visible within its immediate context, particularly from the adjacent settlement edge and from the roads and public rights of way within, or immediately adjacent to the site (including the Country Park). However, this development would generally be well contained by the surrounding settlement edge and by trees and vegetation, and have limited visibility within the wider landscape setting. Where views exist from higher ground to the south, development is likely to be seen in the context of the existing settlement edge and would not be a major detractor within the view.

Although views from the adjacent Country Park are often restricted by earth mounding and tree cover around the perimeter of the park, the most northern parcels of the site can be seen in views from the Toposcope and there are also glimpses into the northern section of the site from an elevated wooded footpath running along the southern boundary.

Figure Five

## ZONE OF THEORETICAL VISIBILITY (ZTV) - WITH VIEWPOINTS



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### LEGEND

- |               |           |  |  |  |
|---------------|-----------|--|--|--|
| Site Boundary | Viewpoint | Viewpoint visited but no view of the site due to screening by offsite buildings or vegetation. | Built up area within 3km where views are further restricted by built form. | Broad belt of tree cover and woodland which combine to screen the majority of views from the west. |
| Light Source  |           |  | <b>Most Visible</b>  | <b>Least Visible</b>   |



# Views

Looking south



Looking north



**VP1: From the toposcope within Baggeridge Country Park.** The view is from a localised viewpoint within the Country Park, where a raised pit mound allows a 360° panorama over the surrounding parkland. It is marked by a toposcope and is reached by a marked trail that is identified on visitor information for the park. Prominent landmarks include the church spire in Sedgley and the brick works chimney, while new housing development on the northern edge is also highly visible. The Straits is screened by landform and tree planting around the southern edges of the site, and this also restricts many longer distance views towards the south. The Country Park is a former colliery site and part of the Himley Estate and offers a range of facilities for recreation and wildlife interest. While the position of the toposcope increases the expectation and level of interest in the view, the setting is already influenced by the surrounding settlement edge, particularly Sedgley to the north east and the new housing development to the north. While the majority of the site is screened from view, the open fields in the north east corner would be visible, extending towards the viewpoint on a north facing crest of land above the surrounding perimeter vegetation.



**VP2: View from PROW to the east.** The view is from a boggy public footpath crossing horse enclosure on the edge of Sedgley. Surrounding landform and vegetation provides a sense of enclosure with some long distance views to the south west where gaps in the tree cover allow. Housing is generally absent within the view, save for a few glimpsed areas on the edge of Kingswinford and a few properties on the edge of The Straits. However, there is a strong sense of overlooking provided by the adjacent housing on the edge of Ruiton, which sits amongst trees on elevated ground to the east. There are a number of public footpath routes crossing the area, allowing recreational access over the paddocks and surrounding fields towards Cotwall End Nature Reserve. However at the time of assessment many of these connecting routes were waterlogged and impassable. Although the view is from a public right of way there is no indication that views from this location are recognised as being of any particular additional importance.





**VP3: View from Sandyfields Road on the approach from the east.** The view is from the main road into the Straits from Sedgley to the east. Although mainly experienced by transient receptors in passing vehicles it is also close to a bus stop and private residences where receptors would be more stationary. It is taken from a position on the edge of Sedgley where the housing enclosure starts to break down and there is a sense of leaving the settlement as views open out across to Baggeridge Country Park in the west, where the chimney stack is a prominent landmark. This is the main point of interest as most wider views are curtailed by the surrounding topography and vegetation cover - although there are some glimpsed distant views beyond the Country Park where gaps in the surrounding trees allow. The majority of the site is screened from view by the bend in the road and the roadside enclosure, although the north eastern corner can be seen through the hedgerow trees where the field slopes gently eastwards towards the viewpoint. The Straits is also screened from view. Although new development at Baggeridge Village can be seen within the view, it appears quite isolated and separate from the settlement edge. The view is not known to have any particular additional value to elevate its importance.

Approach to Miners Walk from within Country Park



Approach to Miners Walk from The Straits



**VP4: View from Miners Walk.** The view is from an attractive tree lined footpath running along the western edge of the northern section of the site. It is a public right of way which links The Straits to Baggeridge Country Park. Along its western edge is Whites Wood, within the Country Park, with informal trails snaking away through the understorey. Along the eastern edge there are views into the open grassed fields on the site through the boundary vegetation. The rising ground and hedgerow partitions curtail longer views across the site, and screen housing within The Straits from view. Lydiates Hill and woodland planting along the edge of the Country Park provide enclosure to the north. The open fields provide a contrast with the wooded enclosure and separate the housing edge from the Country Park. Most receptors will be leisure walkers and local residents accessing the Country Park from The Straits and although it is a public footpath it is not known to have any particular additional value that would elevate the importance of views taken from it.



**VP5: From Sandyfields Road on the edge of The Straits.** The view is from a public road skirting the northern edge of the housing area. There are few views into the land to the north (which forms the northern section of the site) due to the robust roadside hedgerows. Housing along the southern edge is mainly detached bungalows or 2 storey semi-detached. There is a sense of being elevated and gaps in the frontage for side roads occasionally allow longer distance views out to the south and west, although these are mainly characterised by further estate housing. The main receptors will be transient, travelling along the road, or residents of overlooking properties. View from this location are not understood to be recognised as being of any particular additional importance.



**VP6: From High Arcal Road, at junction with St Michaels Road.** The view is from a residential road junction within the Straits. It has a strong suburban estate character. There are narrow linear views towards the site, with parts of the open fields flanking the road and the pylons visible along High Arcal Road. However, surrounding properties and vegetation screen the majority of the site from view. Longer distance views are curtailed by woodland on the western edge of the site. Views would mainly be experienced by transient receptors passing through the area and by local residents moving between the Country Park and the housing estate. The view is from a public road but there is no indication that views from this location are recognised as being of particular importance.





**VP7: View from High Arcal Road on the edge of the site.** The view is from a narrow public road on the approach to The Straits, where the carriageway straightens after a bend in the road and emerges from an enclosed stretch between a woodland and a traditional stone cottage. The rising ground allows an open vista towards the existing settlement edge, typified by 2 storey brick houses backing on to the adjacent fields. Although softened in places by planting it generally presents an abrupt linear edge to the developed area. Swathes of housing can also be seen climbing the hills beyond and extending southwards towards Dudley, where high rise development can be seen on the horizon. Pylons and powerlines are also prominent within the view, extending across the open field corridor. Although rising ground to the north of High Arcal Road is particularly prominent, visibility of the land to the south diminishes with distance as vegetated field boundaries start to screen and enclose individual land parcels. The main receptors will be transient, travelling towards the settlement in vehicles, and there are no associated footpaths for pedestrians. There is no indication that views from this location are recognised as being of any particular additional importance.



**VP8: View from Himley Road, the B4176.** The view is from a busy public road running along the south western edge of the site. This stretch of road is generally enclosed by vegetation along both sides although the view is taken at a point where the lack of roadside tree planting gives a greater sense of openness. However, the layered screening provided by vegetation within the nearby field boundaries curtail any wider views across towards the nearby housing edge and effectively screen the site from view. There are occasional glimpses of pylons above the surrounding vegetation although they do not dominate within the view. Although there is a narrow footway on the northern edge of the carriageway, the main receptors will be transient, travelling along the road in vehicles, and have a relatively short exposure to the view. There is no indication that views from this location are recognised as being of any particular additional importance.



**VP9: View from Oak Lane on the edge of the Pensnett Estate.** The view is from a public road off a roundabout on Stalling's Lane. It currently gives access to a number of commercial operations - which are prominent in the views foreground. The north facing slope allows views across to the rising ground around Lydiates Hill and The Straits, with the open ground forming the southern sections of the site being visible in front of the existing housing edge and the northern section of the site visible on the skyline beyond. However, any proposed development would be seen within the context of the existing settlement edge within a view that it already heavily characterised by nearby commercial and residential development and infrastructure. The view is taken from a public road where the majority of receptors are likely to be transient and only have fleeting interest in the backdrop. There is no indication that views from this location are recognised as being of any particular additional importance.

# Green Belt

## INTRODUCTION

There are two assessments looking at the function of the Green Belt in South Staffordshire. The Greater Birmingham HMA Strategic Growth Study (February 2018) includes a high level Green Belt Review, while the South Staffordshire Green Belt Study (July 2019) provides an assessment of specific land parcels within the District.

## STRATEGIC GROWTH STRATEGY

The Strategic Growth Study (SGS) analyses “the form and strategic function of the Green Belt against the purposes of Green Belt policy set out in the NPPF” (para 8.5) in order to inform its assessment of the options for strategic scale growth within the study area.

The site is located within area W8. As for much of the Green Belt at the edge of the Black Country, the southern parcels are identified as forming part of a wide area that has a principal role in containing urban sprawl and maintaining separation. The northern parcel forms part of an area identified as having a supporting role in those respects.

## SOUTH STAFFORDSHIRE GREEN BELT STUDY

The South Staffordshire Green Belt Study (July 2019) comprises a two stage study:

- Stage 1 considers the contribution of Green Belt in the District to the Green Belt purposes as defined in the NPPF;

- Stage 2 provides a more focused assessment of the potential ‘harm’ of removing specific areas from the Green Belt.

### Stage 1

The site is located within Stage 1 Green Belt Area S71. This is one of the largest areas (at 749.3 hectares) assessed in the study, and therefore, the conclusions are somewhat generalised:

Purpose 1 Checking unrestricted sprawl: Strong. However, that same conclusion is reached for all of the Green Belt on the edge of the Black Country urban area.

Purpose 2 Preventing merging towns: Weak / No contribution. This purpose is not, therefore, considered further in Stage 2 of the study.

Purpose 3 Safeguarding countryside from encroachment: Strong. However, as paragraph 5.25 notes, “the vast majority of land in South Staffordshire makes a strong contribution to preventing encroachment on the countryside”.

Purpose 4 Preserving setting and special character of historic towns: Weak / No contribution. This purpose is not, therefore, considered further in Stage 2 of the study.

Purpose 5 Assist urban regeneration, by encouraging recycling of derelict and other urban land: Strong. This is, however, a consistent generalised conclusion for all of the Green Belt within the District and it is not, therefore, considered further in Stage 2 of the Study.

### Stage 2

Stage 2 seeks to present finer grain of assessment that in order to allow the potential harm to the Green Belt that may arise from specific development opportunities to be considered on a consistent and relative basis.

The southern parcels of the site are assessed as part of Parcel S71B, and then specifically as S71Bs2 ‘Release of land to the north of Himley Road adjacent to the Straits, or between Himley and the B4176 Dudley Road’. The northern parcel is then assessed as part of Parcel S71C, and then specifically as S71Cs2 ‘Release of land to the west of the Straits’.

The study concludes that the release of the southern parcel of the site (S71Bs2) would result in moderate-high harm. The supporting text (Page 744 – Appendix 2) states that “the sub-parcel makes a strong contribution to preventing encroachment of the countryside and sprawl of the large built-up area. To the north of Himley Road, there is no separation between the sub-parcel and inset settlement at The Straits, and woodland provides strong containment from the wider countryside. This area could therefore be released without weakening the Green Belt boundary.”

The study concludes that the release of the northern parcel of the site (S71Cs2) would result in moderate-high harm. The supporting text (Page 747 – Appendix 2) states that “adjacent to The Straits, woodland

contains the southern end of the sub-parcel, so this area could be released with negligible impact on the Green Belt boundary or the integrity of the wider Green Belt.”

It is apparent from the collated conclusions of the Stage 2 Study set out in Figure 7.2a of the Study (reproduced opposite), that the site is one of the least critical parts of the Green Belt on urban edge of the Black Country.

Notwithstanding that, however, it is considered that the final conclusions in relation to the potential harm that would arise from the development of the site itself are overstated given the assessment criteria and site analysis that is presented in the study (as set out above).

Indeed, it is apparent that the land parcels within the site all have a strong relationship with the existing urban area. It is clearly an urban fringe location affected by urbanising features that reduce the visual openness and connections into the urban area. It also benefits from a visual and perceived separation from the wider Green Belt provided by the robust landscape framework, notably the woodland, in the surrounding area.

On that basis, and applying the criteria set out in Tables 4.2 and 4.4 of the Study, it is contended that the site makes a moderate contribution to both Purpose 1: check the unrestricted urban sprawl of large built-up areas and Purpose 3: assist in safeguarding the countryside from encroachment.

Whilst it is inevitable that some harm would arise from the extension of the urban form into what is currently countryside, the site’s relationship with the urban area, and the separation from the surrounding area provided by the surrounding framework mean that the resultant harm would be minimised. Indeed, in light of the considerations set out in Section 6 of the study, it is apparent that the robust landscape framework would effectively contain the development on the site minimising the impact on the function of the residual Green Belt. It would provide a clear defensible boundary to a revised Green Belt area and retain a clear distinction between town and countryside.

Therefore, when applying the “guidelines” set out in Figure 6.1 of the study, in light of the contribution the site makes to Green Belt purposes and the implications its release would have for the residual Green Belt, it is apparent that a Moderate harm rating would be more accurate.



Moreover, it is critical that the further mitigation that can be provided through the carefully considered masterplanning of the site's development that is taken into account. That will provide a logical form of development that is well related to the existing urban area and set within an integrated Green Infrastructure network that links to the surrounding area.

Notably, a small area at the north eastern extent of the site is considered within the wider S71Cs1 area that extends northwards. The study concludes that its release for development would result in very high harm to the Green Belt. However, as highlighted in the scheme mitigation set out in the following section, this area can be retained as public open space forming part of that proposed Green Infrastructure network.

**LEGEND**











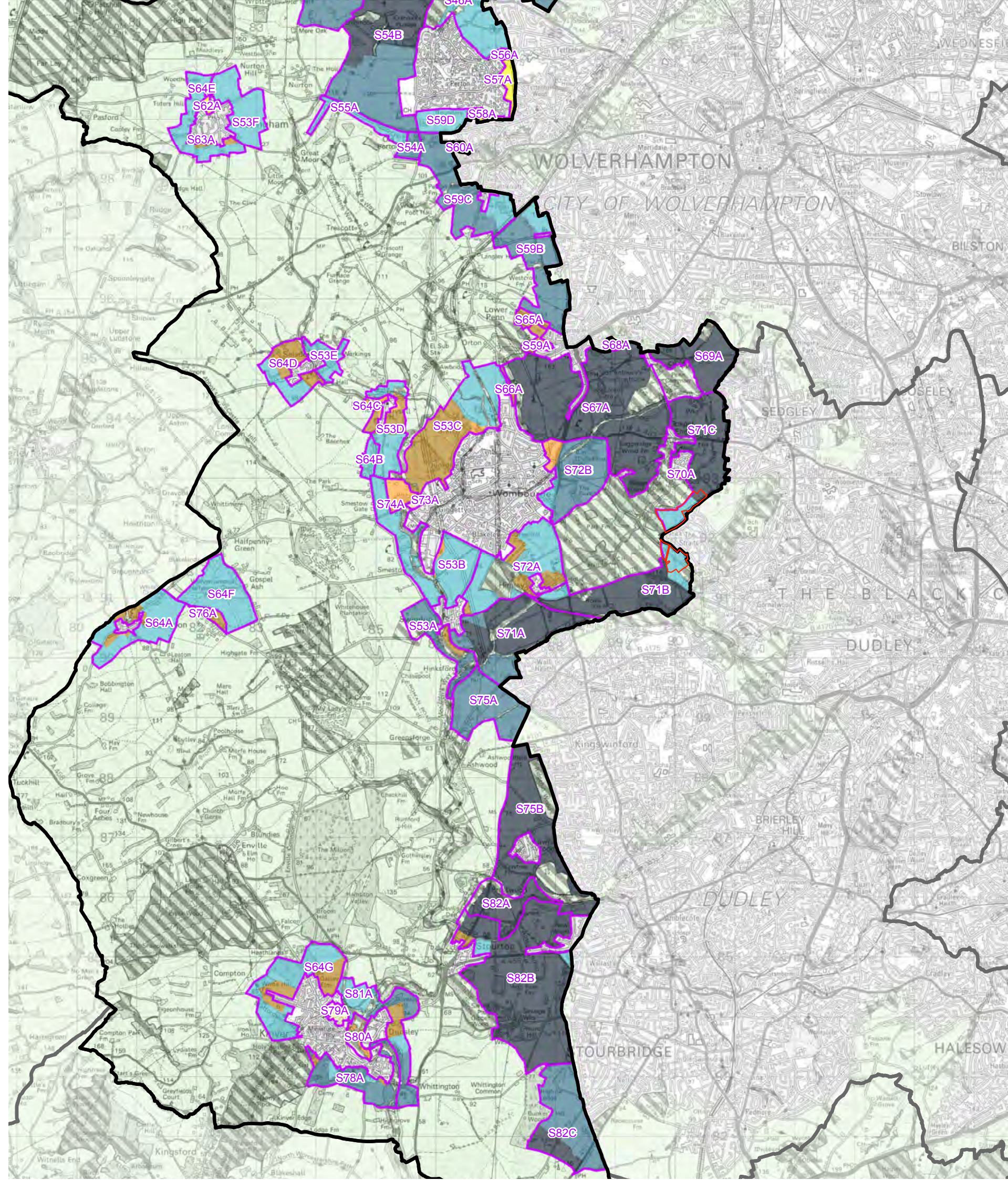
-  Site Boundary
-  South Staffordshire (South)
-  Other Local Authority
-  Green Belt
-  Absolute constraints
-  Stage 2 sub-parcel
- Harm rating**
-  Very High
-  High
-  Moderate - High
-  Moderate
-  Low - Moderate
-  Low
-  Very Low

Figure Six  
**THE SITE WITHIN THE GREEN BELT**  
 (Plan extracted from the Staffordshire Green Belt Study - Figure 7.3b)





# Summary & Conclusions

In considering the site within its landscape and visual context the following key issues have been identified:

## LANDSCAPE

- The site is broadly characteristic of the Landscape Character Type in which it is located. Key characteristics include the pastoral farmland, the irregular, largely intact pattern of small-scale fields, the undulating landform deeply cut by stream valleys and the resulting views across to neighbouring landscapes.
- Urbanising impacts are provided by the highly visible neighbouring housing edge, improved farm cottages and overhead powerlines and pylons.
- The landscape policy objective for the Landscape Character Type is “Landscape Maintenance”. In these areas, the landscape quality is considered to be high and an emphasis is placed on development blending unobtrusively into the landscape while ensuring that it does not lead to the loss of characteristic features.
- Himley Estate, a Registered Park and Garden, is located to the west of the site.
- Baggeridge Country Park is a recreational resource to the north of the site. The brick kiln chimney is a prominent landmark locally.
- There are not considered to be any features on the site that elevate it to being a ‘valued’ landscape as set out within paragraph 170(a) of the NPPF.
- It is not covered by any specific landscape designations.
- There are no public rights of way within the site, although Miners Walk is a public right of way running along the north western boundary and links The Straits with Baggeridge Country Park.

Although development on the site would lead to a change to the landscape in this area, with the loss of a number of fields on the edge of the existing conurbation, many of the notable landscape features will be retained within the Masterplan, including the existing mature hedgerows and trees. This will provide scope for the proposed housing development to be successfully integrated into the surrounding settlement edge. Existing infrastructure corridors, including powerlines and a high pressure gas line will be incorporated within the Masterplan as linear parkland.

## VISUAL

- A ZTV for the site, supported by subsequent fieldwork, shows that potential views of the site are likely to be mainly from the south and south west and immediately to the east, with intermittent coverage from the surrounding areas to the north and west (within 1.5km of

the site) and limited coverage to the east (beyond 2km).

- Fieldwork has shown that views from many of the locations to the north and west are limited by vegetation, particularly the trees and woodland surrounding Baggeridge Country Park and the Himley Estate, while many of the areas to the south and east are already populated by suburban housing areas which limit available views.
- A number of key views were identified and appraised. These look at the potential impact on views from key approaches into the housing area from the north (on Sandyfields Road), from the south (on Himley Road / High Arcal Road) and from the east (within the Straits), from public viewpoints within the Country Park, from Miners Walk, from public rights of way to the east, from the surrounding residential roads and from the rising ground to the south.

Although development is inevitably going to be visible within its immediate context, particularly from the adjacent settlement edge and from the roads and public rights of way within, or immediately adjacent to the site (including the Country Park), it would generally be well contained by the surrounding settlement edge, trees and vegetation, and would have limited visibility within the wider landscape setting. Where views exist from higher ground to the south, development is likely to be seen in the context of the existing settlement edge and would not be a major detractor within the view.

## GREEN BELT

The South Staffordshire Green Belt Study concludes that the site is one of the least critical parts of the Green Belt on the edge of the Black Country Urban Area when assessed against the purposes set out in the NPPF. Indeed, whilst some harm would (inevitably) arise from the extension of the urban form into what is currently countryside, the site’s relationship with the urban area, the presence of urbanising elements and the containment provided by the surrounding framework mean that the result harm would be minimised, certainly in comparison to other locations on the edge of the Black Country. Moreover, further mitigation can be provided through the carefully considered masterplanning of the site’s development that will provide a logical form of development set within an integrated Green Infrastructure network.

## PROPOSED MITIGATION MEASURES




























A number of features have been included within the Masterplan to respond to issues raised in the appraisal. These are shown on **Figure Six** and are summarised as:

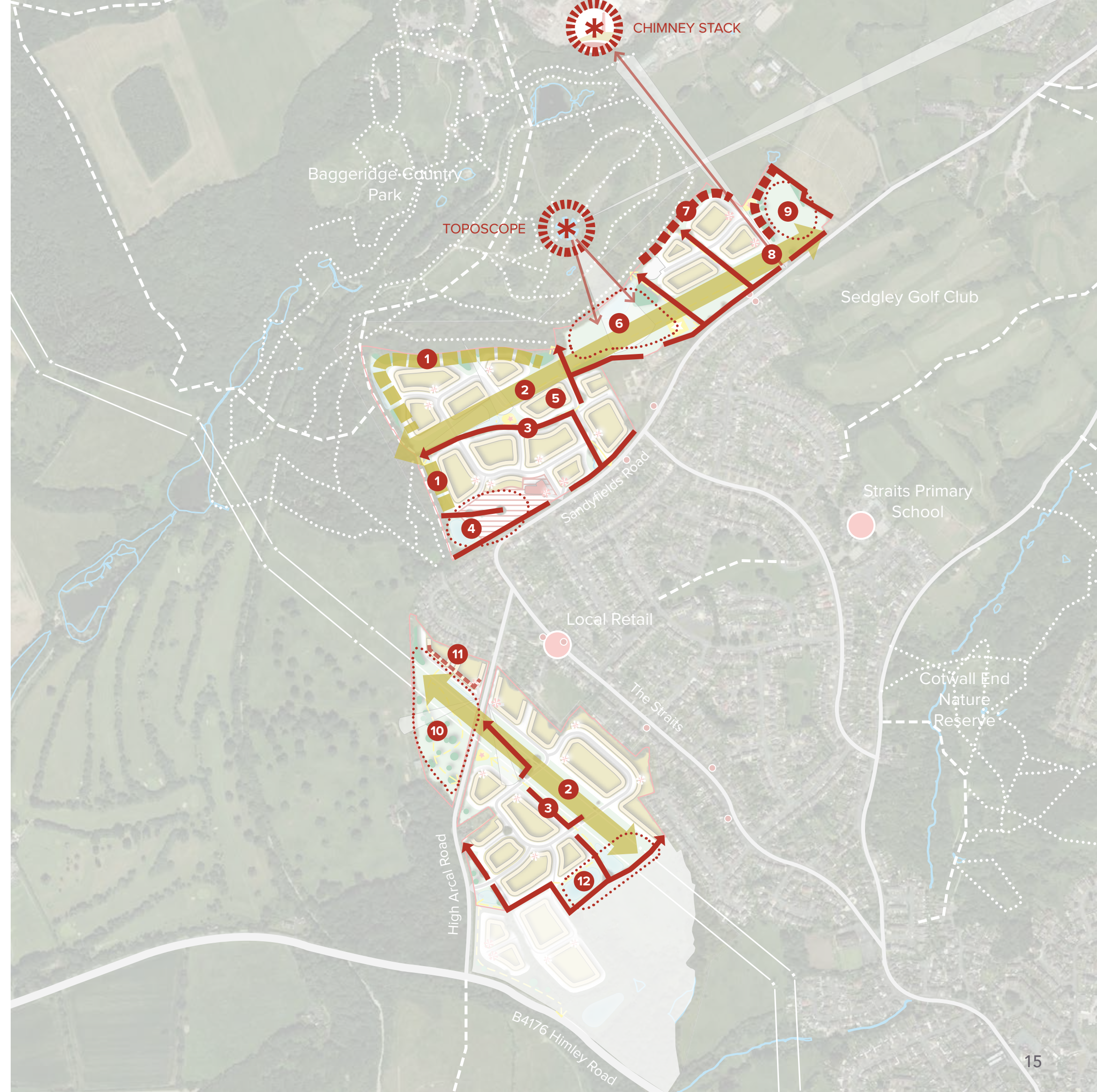
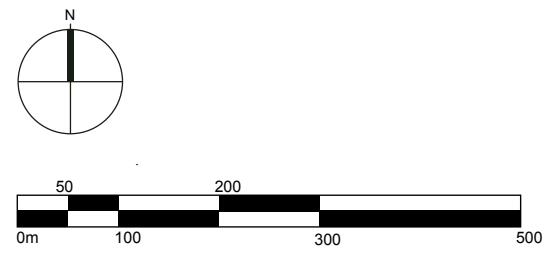
- 1 A robust landscape buffer, incorporating native tree and shrub planting, SuDS and grassland softens views of the development edge and provides separation from Baggeridge Country Park and White’s Wood.
- 2 Linear parklands within the site intersect with retained hedgerow corridors as part of a strong green infrastructure network and incorporate the HSE inner and middle zones for the Tipton Auto/Haglay gas main and overhead powerlines.
- 3 Existing hedgerows will be retained within the development where possible. As well as providing the basis for green corridor links across the development they will help to integrate the proposed development into the existing landscape.
- 4 The school site will be located in the south west corner where it is easily accessible by the surrounding communities but also form part of an open space buffer alongside Miners Walk.
- 5 Proposed development will be carefully arranged on the highest parts of the site to minimise visual impact. This may include the use of single storey properties to reduce the scale of development in some locations.
- 6 Open space maintained as backdrop to localised view from the Toposcope in Baggeridge Country Park.
- 7 Strengthen belts of tree planting along the site perimeter to strengthen the existing landscape structure and help to screen the development in views from the surrounding area.
- 8 Access road orientated along the view to the chimney stack within Baggeridge Village when entering the site to the north off Sandyfields Road.
- 9 East facing slope kept open to maintain sense of separation from edge of Sedgley and minimise harm to the Green Belt.
- 10 An open parkland area provides an attractive setting to Himley Hall Registered Park and Garden. Strategically placed tree planting and roadside hedgerows will help to frame views and filter the proposed housing edge.
- 11 Buildings arranged to present a more sympathetic frontage to the settlement edge in views from High Arcal Road.
- 12 SuDS and open space provide a buffer between the development edge and the adjacent wildlife site.



Figure Six  
**MITIGATION MEASURES**

**LEGEND**

-  Site boundary
-  Existing vegetation
-  Residential block
-  Potential school site
-  Open space
-  LEAP
-  NEAP
-  Tree/woodland planting
-  Existing watercourse/body
-  SuDS
-  Existing road
-  Primary street
-  Secondary/tertiary street
-  Bridleway
-  Public footpath
-  Informal path
-  Pedestrian/cycle links
-  Pedestrian/cycle link/emergency access
-  Nearby bus stop
-  Key local facility
-  Car park
-  Local landmark
-  Viewing area
-  Views
-  Key building
-  Focal building
-  Overhead powerline





**BLOOR HOMES**<sup>®</sup>

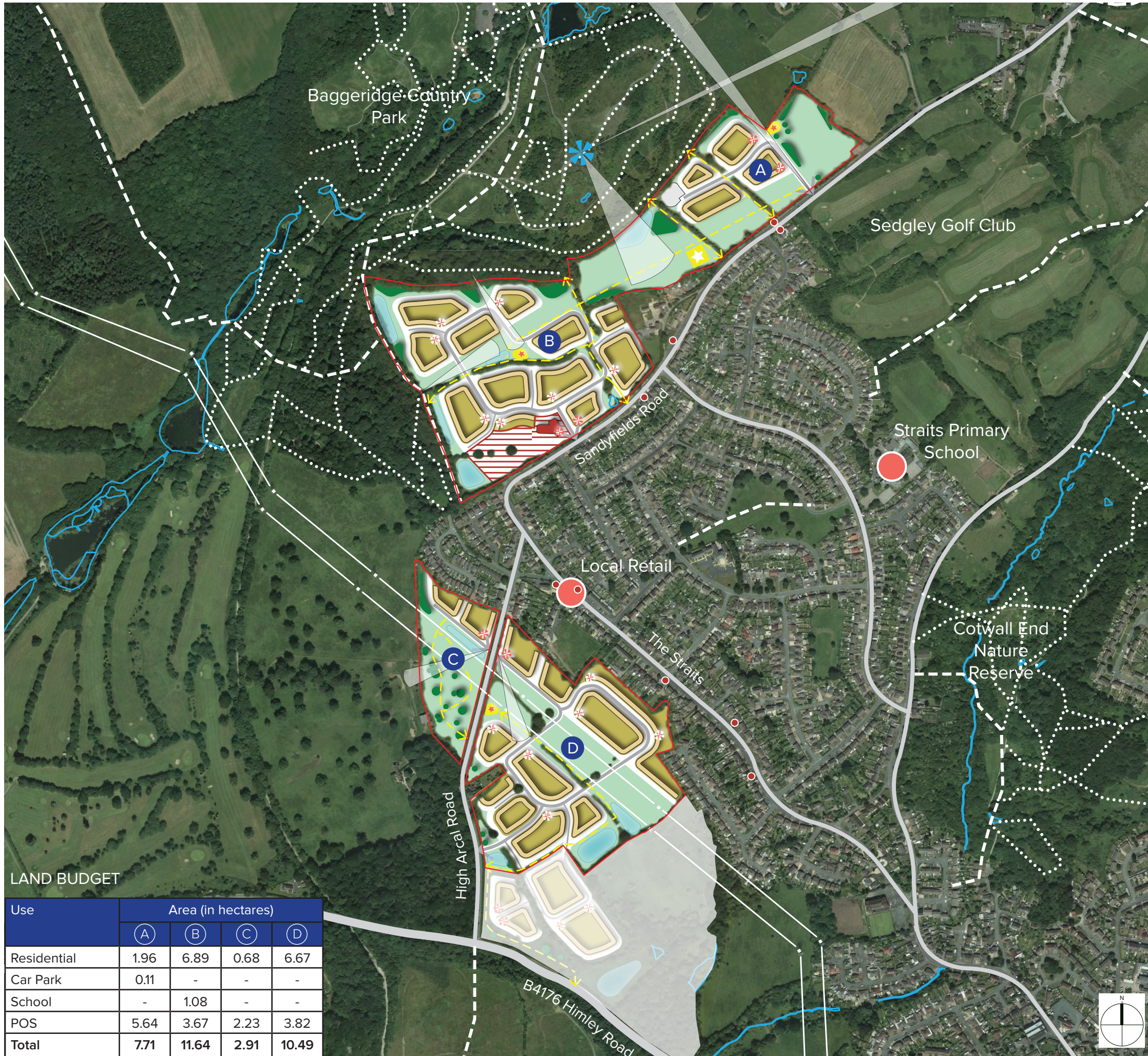
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# APPENDIX 3

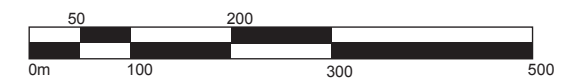
## Illustrative Concept Plan





LEGEND

- Site boundary
- Existing vegetation
- Residential block
- Potential school site
- Open space
- LEAP
- NEAP
- Tree/woodland planting
- Existing watercourse/body
- SuDS
- Existing road
- Primary street
- Secondary/tertiary street
- Bridleway
- Public footpath
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- Nearby bus stop
- Key local facility
- Car park
- Local landmark
- Viewing area
- Views
- Key building
- Focal building
- Overhead powerline



LAND BUDGET

Use	Area (in hectares)			
	(A)	(B)	(C)	(D)
Residential	1.96	6.89	0.68	6.67
Car Park	0.11	-	-	-
School	-	1.08	-	-
POS	5.64	3.67	2.23	3.82
<b>Total</b>	<b>7.71</b>	<b>11.64</b>	<b>2.91</b>	<b>10.49</b>

Rev  
**DE\_033\_003** Drg No  
**Bloor Homes Ltd,** Client  
**Land at The Straits** Project  
**Masterplan** Title  
**1:7,500 @ A3** Scale





**EVOLVE**  
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