

# South Staffordshire Regulation 19 Publication Document

## Statement of Representations

Land off Orton Lane and Land west of Strathmore Crescent, Wombourne

Submitted on behalf of Bellway Homes Ltd

May 2024

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**Client**

Bellway Homes Limited

**Our reference**

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# 1. Introduction

- 1.1 These representations are on behalf of Bellway Homes Limited (“Bellway”), in response to the South Staffordshire Local Plan Review (“LPR”) Regulation 19 consultation.
- 1.2 Bellway welcome the opportunity to make representations on the final draft version of the Local Plan in terms of soundness and legal compliance. For completeness, our representations to the Regulation 19 public consultation held in December 2022 can be found at **Appendix 1**.

## The Sites

- 1.3 Bellway is promoting two sites at Wombourne:
- Land off Orton Lane, Wombourne
  - Land west of Strathmore Crescent, Wombourne

### Land off Orton Lane, Wombourne

- 1.4 Land off Orton Lane is a 1.76ha site to the north of Wombourne (Site Ref: 416), a site location plan is enclosed at **Appendix 2**. We support the continued allocation of the site within the latest Publication Plan. It represents a sustainable and deliverable residential opportunity with a live full planning application (ref: 24/00241/FULM) for 32 dwellings, including bungalows, public open space, and associated infrastructure.
- 1.5 This site forms part of a wider allocation alongside land to the north, which is promoted separately by St Philips, the site is proposed to be allocated for a minimum 57 new homes (draft policy SA3, where it is referred to as ‘Land off Orton Lane’). Bellway’s southern extent of the proposed allocation is currently safeguarded in the adopted Site Allocations Document, as is the northwestern extent of the allocation.
- 1.6 Development of the site at Orton Lane will help to meet the housing need for the village and wider South Staffordshire. The site will deliver much needed affordable housing and open space and a more robust settlement edge than currently offered. In addition, the site could provide linkages to land to the west (outlined below) to create a larger strategic site on the edge of Wombourne.
- 1.7 There are no constraints to the development of the site, which has been demonstrated by the live planning application (ref: 24/00241/FULM).
- 1.8 Together with Bellway, we will continue to work with St Phillips to ensure the masterplans for both sites are coordinated and capable of working together. This will include connections between the two sites.

### Land west of Strathmore Crescent, Wombourne

- 1.9 Bellway controls additional land beyond Orton Lane, to the west of Strathmore Crescent (Site Ref: 708), it adjoins the western boundary of the Orton Lane site (Site Ref: 416). The site has the potential to deliver an additional 40-50 homes, forming an extension of the proposed allocation off Orton Lane. The site would be accessed via the

proposed Orton Lane allocation and could offer a new link through to the adjacent railway walk, a site location plan is enclosed at **Appendix 3**.

- 1.10 The small-scale nature of this site represents a suitable and sustainable opportunity for growth at Wombourne, requiring limited Green Belt release, and would have a limited impact on the Green Belt more widely given its scale alongside its physical and visual self-containment. The South Staffordshire Railway Walk situated to the west would also provide a permanent, defensible boundary for the site, and further development to the east.
- 1.11 Together with the land off Orton Lane, the land represents a comprehensive solution to meeting Wombourne's needs in a single location, which is very well defined by its boundaries.

### **Bellway Homes**

- 1.12 Evolving from a local family business to a FTSE 250 major PLC, Bellway builds exceptional quality new homes throughout the UK, delivering almost 11,000 new homes across the UK in the last year. They are an established five-star housebuilder as a result of their emphasis on build quality, customer care and health and safety, and build and sell high quality homes to suit local housing styles as well as providing social housing to housing associations.
- 1.13 Bellway, with their consultant team, have and will continue to seek to work closely with the Council, statutory consultees, and other stakeholders through the development plan process, and as the housebuilder for the site with a strong track record for delivery, will ensure careful attention is given to viability and costs in plan making.
- 1.14 Bellway welcome the opportunity to further engage with the LPR through the Regulation 19 consultation. We respond to the Publication Plan at **Section 2, 3 and 4** of these representations and provide a summary at **Section 5**. The statement provides further context to responses set out in the consultation forms which are also submitted on behalf of Bellway Homes.

## 2. Key concerns with the soundness of the Publication Plan 2024

### Compliance with the National Planning Policy Framework (“NPPF”) (December 2023)

- 2.1 Please refer to the Counsel Advice Note at **Appendix 4** alongside the below.
- 2.2 The plan sets out the approach to growth for South Staffordshire over the plan period, including the spatial strategy and approach to development in the Green Belt and Open Countryside. The previous Publication Plan (November 2022) was planning for 9,089 homes, including a 4,000-home contribution of unmet needs to the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).
- 2.3 Towards the end of the consultation in December 2022, the government launched a consultation on a revised NPPF, which suggested there would be no requirement to review Green Belt boundaries to meet housing needs. Since the 2022 iteration of the Publication Plan included significant Green Belt release, to meet the needs of South Staffordshire but also to provide contributions to the GBBCHMA unmet needs, the submission of the plan was stalled until the NPPF was updated.
- 2.4 The revised NPPF was published in December 2023, paragraph 145 sets out that: *“Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.”*
- 2.5 The updated 2024 Publication Plan now being consulted upon revises the strategy for growth, specifically reducing the proportion of Green Belt release. The emerging Plan sets out a housing need over the Plan period of 4,086 to 2041, with a minimum 227 dwellings to be delivered per annum, a substantial decrease from that which was proposed in the 2022 Publication Plan. The contribution to the unmet needs of the GBBCHMA have also been substantially reduced from 4,000 dwellings in the November 2022 Publication Plan to just 640 dwellings, 16% of what was previously being planned for.
- 2.6 This notwithstanding, paragraph 230 of the NPPF sets out that:  
*“The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre- submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements.”*
- 2.7 As set out in the Counsel Advice Note at **Appendix 4**, Regulation 19 consultation on the Publication Plan was undertaken in November – December 2022 and therefore the Plan will be examined in accordance with the previous provisions of the NPPF. Removing allocations requiring the release of Green Belt land from the emerging plan

to align with the December 2023 NPPF does not therefore accord with this paragraph and as such, the strategy upon which the amended Publication Plan 2024 is based is unsound and does not accord with the NPPF.

### 3. Response to Draft Strategic Policies

#### Cross boundary issues and the duty to cooperate, and Strategic Objectives

- 3.1 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.
- 3.2 There are a number of plans across the HMA intending to be submitted before the government's likely deadline of 30 June 2025 for being examined under the current system, rather than that contained in the Levelling Up and Regeneration Act. In particular this includes Dudley, Sandwell and Wolverhampton. All three of these authorities have published draft plans with proposed allocations for regulation 18 consultation. In all cases, none propose to meet their own need, in doing so none intend to release any Green Belt for new homes. For Dudley and Wolverhampton, this represents a change to their approach in the now abandoned Black Country Plan.
- 3.3 Irrespective of the relevant NPPF which applies, both the 2021 and 2023 versions include a requirement to comply with the duty to cooperate (it is also a legal requirement). The duty should not be used as a 'race to the bottom' to disregard the scale of housing need across the HMA up to 2031, which the Turley "Falling Even Shorter" report (enclosed at **Appendix 5**) demonstrates stands at 40,676 homes up to 2031. It should be used as a way to strategically plan and meet the HMA's total needs.
- 3.4 Ultimately it is not clear how the HMA authorities intending to submit before June 2025 can meet the Duty to Cooperate (DtC) when leaving such a significant scale of unmet need. All HMA authorities, including South Staffordshire, should be working together to agree how the unmet need up to 2031, as a minimum, is going to be met. This unmet need represents real people in need of a home, now. This will require difficult decisions to be made in terms of Green Belt release. The previous Publication Plan (2022) demonstrates that South Staffordshire has suitable and deliverable capacity to deliver at least 4,000 additional homes which can contribute to the GBBCHMA unmet need.
- 3.5 It is noted that Wolverhampton City Council Cabinet agreed to submit representations to the South Staffordshire Publication Plan 2024 at their meeting on the 22nd May responding that, of the 640-home contribution provided by the emerging plan, 464 homes (72.5%) should specifically be allocated to Wolverhampton. This notwithstanding, should the majority of the contribution be allocated to Wolverhampton, it is unclear what proportion would be allocated to the other Black Country authorities and further underlines the uncertainty over how the HMA authorities collectively will demonstrate that they have met the DtC requirements.
- 3.6 The reduced contribution of unmet needs the Publication Plan (2024) now proposes is also not reflective of the functional links between South Staffordshire and the Black Country and the wider HMA. The needs of the Black Country should be met in locations as close as possible to where the need arises, as such, South Staffordshire is encouraged to revisit the contributions proposed and reengage with the wider HMA authorities, particularly given other authorities are also not providing sufficient contributions to meet the growing unmet needs of the Black Country.

### **Policy DS1: Green Belt**

- 3.7 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.
- 3.8 As set out in Section 2 of this Statement, the core theme of the Publication Plan is focussed on protecting the Green Belt, which forms strategic objective no. 1 of the Publication Plan (2024). This theme has been emphasised in this revised Publication Plan through the removal of many proposed Green Belt allocations previously proposed by the 2022 Publication Plan. This is based on a fundamental misinterpretation of Paragraph 145 and 230 of the NPPF. Although the allocation of the site off Orton Lane, Wombourne, comprises safeguarded land, the approach South Staffordshire have taken to the wider release of Green Belt land to meet needs severely restricts where development can be located in the district, and has become even more challenged given the omission of what we consider to be proportionate Green Belt release from the emerging plan.
- 3.9 Having regard to the Land west of Strathmore Crescent, the *“Landscape and Green Belt Review”* at **Appendix 6** considers the contribution the site to the Green Belt. Overall, it is concluded that the site is considered to make a limited contribution to the open character of the wider Green Belt parcel, stating that *“the site does not contribute to a “strong distinction” between the wider countryside and the settlement edge...Due to the presence of residential development on its eastern boundary, the site reads as part of the settlement edge. The site’s triangular shape and location between the South Staffordshire Railway Path to the west and residential development in the east reduce its contribution to the open character of the Green Belt.”* On this basis, it is not considered that the release of the site from the Green Belt would have a significant impact on the integrity of the Green Belt and would still retain the gap between Wombourne and nearby settlements. Furthermore, the development of the site, combined with that off Orton Lane, would allow for the creation of a defensible edge to the settlement.
- 3.10 We have no in principle concern in respect of the wording of draft policy DS1 itself and support the plan as a whole, however we emphasise the importance of reconsidering the approach to reviewing the Green Belt given the provisions of the NPPF and how the Plan will be examined, and also to ensure South Staffordshire is able to meet its own needs, whilst also providing a proportionate contribution to the GBBCHMA unmet needs befitting its functional links to the Black Country.

### **Policy DS2: Green Belt Compensatory Improvements**

- 3.11 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.
- 3.12 The policy is considered to align with NPPF paragraph 147 which states that the removal of land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt. Planning practice guidance clarifies that this could include new or enhanced green infrastructure, woodland planting, landscape and visual enhancements, improvements to biodiversity and habitats, new or enhanced walking and cycling routes, and improved access to new or existing recreational and playing field provision. Sufficient

flexibility is provided by the policy where contributions could be provided in lieu of a specific scheme being identified, which is supported. As such, it is considered to be sound.

- 3.13 Having regard to the full planning application at land off Orton Lane, Wombourne (Ref: 24/00241/FULM), although the site is safeguarded land, opportunities for additional tree and landscape planting have been incorporated into the design of the scheme, to screen the proposed development and to also provide biodiversity net gains. The Design and Access Statement submitted with the application is provided at **Appendix 7** of this statement and sets this out in further detail.

#### **Policy DS4: Development Needs**

- 3.14 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

- 3.1 South Staffordshire's housing need (using the standard method), as set out by the Publication Plan 2024, over the plan period requires delivery of 4,086 homes by 2041, whilst an additional 640 dwellings over the plan period are to be delivered to contribute to the unmet needs of the GBBCHMA. Combined, the total need planned for by the emerging plan is 4,726 dwellings over the plan period.
- 3.2 By contrast, the Publication Plan 2022 set out a need in the district of 5,089 dwellings to 2039 and planned for a 4,000-dwelling contribution to the unmet needs of the GBBCHMA. The total number of dwellings planned for totalled 9,089 over the plan period.
- 3.3 This change is predicated on the basis that the changes to the NPPF (December 2023) no longer require Green Belt review to meet housing needs, and the subsequent allocation of sites for development currently designated as Green Belt have been omitted from this iteration of the Plan. As set out in response to policy DS1 and in Section 2 of this Statement, this is not justified in the context of Paragraph 230 of the NPPF, and this cannot therefore be relied upon as justification for not reviewing the Green Belt in South Staffordshire.
- 3.4 This change represents a substantial decrease in the number of dwellings being planned for in South Staffordshire, to meet the district's needs as well as providing a contribution to the GBBCHMA. As set out in response to duty to cooperate above, all HMA authorities, including South Staffordshire, should be working together to agree how the unmet need up to 2031, as a minimum, is going to be met. This unmet need represents real people in need of a home, now. This will require difficult decisions to be made in terms of Green Belt release. The previous Publication Plan (2022) demonstrates that South Staffordshire has suitable and deliverable capacity to deliver at least 4,000 additional homes which can contribute to the GBBCHMA unmet need.
- 3.5 The above should therefore be reflected in the plan's overall housing need and accordingly policy DS4.
- 3.6 The Publication Plan 2024 substantially decreases the number of dwellings being planned for in South Staffordshire, to meet the district's needs as well as providing a contribution to the GBBCHMA. Having regard to the Housing Market Assessment

(2022) a housing need of 241 dwellings per year was established using the Standard Method, which has been updated by the Strategic Housing Market Assessment Partial Update (2024), reducing the need to 227 dwellings per year. As such, 4,086 dwellings are currently being planned for to meet South Staffordshire's needs over an 18-year plan period alongside a contribution of 640 dwellings to the GBBCHMA.

- 3.7 As noted by Policy DS4, approximately 10% additional homes will be provided to “ensure plan flexibility”, this is not however reflected in the housing target, which would increase the need by 473 dwellings. It is assumed the District intend to provide for this allowance through windfall sites, however, to plan positively and to ensure sustainable development comes forward, additional sites should be allocated to meet this need, particularly since the updated Housing Assessment also projects an increase in the number of working age people moving to the District over the plan period, accommodating these people will be key to the long term economic growth and social sustainability of the District. Sites such as that off Strathmore Crescent represents an opportunity to extend a proposed allocation in the plan (land off Orton Lane, Wombourne), and would therefore represent a sustainable option for meeting this additional need. This approach would accord with the provisions of the NPPF which sets out at paragraph 35a) that for a plan to be considered positively prepared it should provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.
- 3.8 The site west of Strathmore Crescent is available and could come forward early in the plan period to meet the additional needs of the district and any further unmet needs accommodated for from the Black Country.

#### **Policy DS5: Spatial Strategy to 2041**

- 3.9 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.
- 3.10 Strategic objective 2 reflects the change in approach towards the location of new housing since the Publication Plan 2022, focussing development in Tier 1 settlements as opposed to locations “either within or adjacent to the district's key villages or through urban extensions adjacent to neighbouring towns and cities” as set out by the 2022 Publication Plan (objective 2), which would have required Green Belt release.
- 3.11 The policy sets out that growth will be directed towards the most accessible and sustainable locations, whilst also ensuring that the natural and historic environment is maintained and enhanced to protect local distinctiveness.
- 3.12 Bellway support the allocation of land off Orton Lane, Wombourne, which currently comprises safeguarded land in the adopted plan, and highlight the potential for extending the proposed allocation to the west off Strathmore Crescent.
- 3.13 Wombourne is identified as a ‘Tier 2 Settlement’ within the policy. The village benefits from frequent bus services Wombourne, Merry Hill, Swindon, Stoubridge, and Wolverhampton, with the nearest bus stop to the site off Orton Lane/Strathmore Crescent being from Bull Meadow Lane to the south. Bus services provide connections to the railway station in Wolverhampton. This station provides direct and regular rail



services to Birmingham and London. As such, Wombourne is considered to be highly accessible and is well served by good public transport links.

- 3.14 The settlement also benefits from a range of local facilities, including a day nursery, two primary schools, a secondary school, doctor's surgery, dentist, leisure centre and pharmacy. The availability of local services limits the need for residents to travel for their day-to-day needs. On this basis, Wombourne is considered to be a highly sustainable and accessible 'Tier 2 Village', capable of accommodating further growth.
- 3.15 Notwithstanding this, the Spatial Strategy limits the growth of Tier 2 settlements to delivery of appropriate allocations identified through the Local Plan, comprising "*suitable and deliverable non-Green Belt site allocations*". Although the allocation of the land off Orton Lane, comprising safeguarded land, is supported, the overarching strategy for Tier 2 settlements is not considered to be reflective of the inherent sustainability of settlements such as Wombourne. Furthermore, distributing growth to Tier 2 settlements would avoid placing undue pressure on higher Tier 1 settlements whilst also allowing for smaller settlements to benefit from investment, support for economic growth, and footfall from new residents using local services and businesses.

### **Policy SA3: Housing Allocations**

#### ***Land off Orton Lane (Housing Allocation 416)***

- 3.16 Bellway welcome the continued allocation of the site off Orton Lane, although note that the overall size of the proposed allocation has been reduced with the northeastern parcel fronting Orton Road remaining as designated Green Belt land. This has reduced the number of dwellings to be delivered to 57 from 79 dwellings, as set out in the Publication Plan 2022.
- 3.17 It was confirmed through the *Housing Site Selection Topic Paper (2021)* that the "*site's assessment process has revealed no unmitigable constraints to the delivery of the safeguarded land in Wombourne*". This was also confirmed through the examination of the SAD in 2018.
- 3.18 The Site is currently subject to a live full planning application (ref: 24/00241/FULM) which is accompanied by a full suite of technical assessments and surveys. The proposed development seeks the erection of 32 high quality new homes on the southern part of the proposed allocation (within Bellway's ownership) including bungalows and 31% affordable housing, a new access off Orton Lane, landscaping, and drainage, on a site to the north of Wombourne.
- 3.19 As outlined within this Planning Statement (**Appendix 8**) and across the submission, the proposed development will deliver several key benefits to the local area. These include the following:
- Provision of 32 high-quality dwellings in a sustainable location.
  - Provision of 31% affordable homes on the site, of a range of tenure types to meet the needs of South Staffordshire.

- Inclusion of both market and affordable bungalows and a mix of house sizes and types – adding choice and competition to the local housing market.
- Economic benefits during and beyond the construction period which will boost and sustain the local economy.
- Enhancing connectivity in the wider area through provision of new pedestrian routes, knitting the site into the wider area and the adjacent land parcel.
- Net Zero ready homes, designed in accordance with the 2025 Future Homes Standard, making them energy efficient.
- Providing enhancements to existing habitats on site, through supplemental planting, a comprehensive landscape strategy, and tree retention, where possible.
- Delivery of a sustainable drainage solution for the site that will manage and mitigate the risk of flooding and climate change.

3.20 There are no constraints to the development of the site, which has been demonstrated by the live planning application (ref: 24/00241/FULM).

3.21 Bellway control the southern extent of the proposed allocation, whilst St Phillips control the northern extent (previously housing allocation 416a in the Publication Plan 2022). Bellway are committed to continuing to work with the promoters/developer of the site to the north going forward. Although the north eastern parcel fronting Orton Road has been excluded from the proposed allocation, it should be noted that the proposed access from Orton Road, and the internal access route through the site, as proposed by the live full planning application (ref: 24/00241/FULM) has been designed to be capable of accommodating traffic for the site as a whole, including the land to the north. In addition, the access has been designed to accommodate the development of land west of Strathmore Crescent. Alongside the vehicular access, pedestrian and cycle access have also been designed to serve Bellway’s land, as well as the St Philips land to the north and land to the west.

3.22 Overall, Bellway support the principle of the release of the safeguarded land at Orton Lane for allocation for housing growth. The site remains suitable, available, and achievable for development, and has been demonstrated to be deliverable by the live full planning application.

***Land off Billy Buns Lane and Gilbert Lane (Site Refs: 463 & 284 in the Publication Plan 2022)***

3.23 As set out in our representations at **Appendix 1**, Bellway raised concerns over the inclusion of these sites in the Publication Plan 2022. Noting that these proposed allocations have now been omitted from the Publication Plan 2024, we reiterate that land west of Strathmore Crescent (Site Ref: 708) is a sustainable and suitable option for development to meet the needs of Wombourne and wider District. Please refer to Section 2 of our representations at **Appendix 1** for further comments on this matter.

## 4. Response to Draft Development Management Policies

### **Policy HC1: Housing Mix**

- 4.1 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

### **Policy HC2: Housing Density**

- 4.2 The policy sets out minimum density requirements for development, including 35 dwellings per hectares in Tier 1-3 settlements, which includes Wombourne, this can be varied where this would have an adverse impact on the historic environment, settlement pattern and/or character.
- 4.3 The Planning Application for the site off Orton Lane (Ref: 24/00241/FULM) comprises a proposal for 32 dwellings on a site measuring 1.76 hectares. The proposal was informed by Pre-Application discussions with South Staffordshire Council and given the house types proposed (including bungalows), the character of the site and other factors such as the need for drainage attenuation, the density doesn't meet 35 dwellings per hectare, but it is considered that the number proposed is more appropriate for the site.

### **Policy HC3: Affordable Housing**

- 4.4 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

### **Policy HC4: Homes for Older People**

- 4.5 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

### **Policy HC12: Space about dwellings and internal space standards**

- 4.6 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

### **Policy HC13: Parking provision**

- 4.7 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

### **Policy HC17: Open Space**

- 4.8 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

### **Policy HC19: Green Infrastructure**

- 4.9 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

**Policy EC13: Broadband**

4.10 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

**Policy NB2: Biodiversity**

4.11 The policy requires that professional ecological reports are provided where impacts to biodiversity are anticipated to demonstrate how the mitigation hierarchy has been applied.

4.12 Bellway are supportive of the policy requirement to provide “measures to assist with halting the decline of species and to address biodiversity loss” however this should be proportionate and reflected as such in the policy. We suggest including the wording “proportionate measures...”.

4.13 The policy also includes a list of potential enhancements including bat and bird boxes, hedgehog highways and bee bricks. These should be presented as examples of measures that could be provided through development and should not act as an exclusive and closed list. Wording should be included to acknowledge that these are examples and others may be proposed to allow flexibility and ensure measures are appropriate for the type and location of development.

**Policy NB6A: Net Zero New Built Residential Development (Operational Energy) AND Policy NB6C: Embodied Carbon and Waste**

4.14 Please refer to **Appendix 9** for our representations in respect of these policies.

## 5. Summary

- 5.1 Bellway welcome the opportunity to engage with the South Staffordshire Local Plan Review Publication Plan Regulation 19 public consultation.
- 5.2 Bellway are supportive of the continued proposed allocation of land off Orton Lane, Wombourne (Housing Allocation 416) which is supported by the plan's evidence base, and the suite of technical documents and plans submitted with the live full planning application for the site (ref: 24/00241/FULM).
- 5.3 Bellway however have the following concerns regarding the plan, set out as follows:
- Paragraph 230 of the NPPF sets out that: "The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre- submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements." Regulation 19 consultation on the Publication Plan was undertaken in November – December 2022 and therefore the Plan will be examined in accordance with the previous provisions of the NPPF. As emphasised by the Counsel Advice Note at **Appendix 4**, removing allocations from the emerging plan to align with the December 2023 NPPF does not therefore accord with this paragraph and the approach South Staffordshire have taken is fundamentally wrong in principle and in the context of the NPPF.
  - There are a number of plans across the HMA intending to be submitted over the next year, ahead of the government's likely deadline of 30 June 2025 for examination under the current system, including Dudley, Sandwell and Wolverhampton. These authorities have published draft plans with proposed allocations for regulation 18 consultation. Of note, none of the emerging plans propose to meet their own need, and as a result, they make no release of Green Belt for new homes. The NPPF, irrespective of it being the 2021 or 2023 version, sets out a requirement to comply with the duty to cooperate, which is also a legal requirement. The duty should not be used as a 'race to the bottom' to disregard the scale of housing need across the HMA up to 2031, which the Turley "Falling Even Shorter" report (enclosed at **Appendix 5**) demonstrates stands at 40,676 homes up to 2031. It should be used as a way to strategically plan and meet the HMA's total needs. It is unclear how the HMA authorities will demonstrate they have met the duty to cooperate when leaving such a significant scale of unmet need unaddressed. We emphasise in this submission that all HMA authorities, including South Staffordshire, should be working together to agree how the unmet need up to 2031, as a minimum, is going to be met. This unmet need represents real people in need of a home, now. This will require difficult decisions to be made in terms of Green Belt release. The previous Publication Plan (2022) demonstrates that South Staffordshire has suitable and deliverable capacity to deliver at least 4,000 additional homes which can contribute to the GBBCHMA unmet need.

- The reduced contribution of unmet needs the Publication Plan (2024) proposes is not reflective of the functional links between South Staffordshire and the Black Country and the wider HMA. The needs of the Black Country should be met in locations as close as possible to where the need arises, as such, South Staffordshire is encouraged to revisit the contributions proposed and reengage with the wider HMA authorities, particularly given other authorities are also not providing sufficient contributions to meet the growing unmet needs of the Black Country.
- The Publication Plan 2024 substantially decreases the number of dwellings being planned for in South Staffordshire, to meet the district's needs as well as providing a contribution to the GBBCHMA. Having regard to the Housing Market Assessment (2022) a housing need of 241 dwellings per year was established using the Standard Method, which has been updated by the Strategic Housing Market Assessment Partial Update (2024), reducing the need to 227 dwellings per year. To provide flexibility in the plan, an additional 10% buffer should be provided, increasing the need by 473 dwellings. Although the Council may assume this will be met by windfall development, to plan positively and to ensure sustainable development comes forward, additional sites should be allocated to meet this need. The site west of Strathmore Crescent is available and could come forward early in the plan period to meet the additional needs of the district and any further unmet needs accommodated for from the Black Country. This approach would accord with the provisions of the NPPF which sets out at paragraph 35a) that for a plan to be considered positively prepared it should provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.
- Wombourne is considered to be a highly sustainable Tier 2 settlement, as recognised by the emerging plan. Notwithstanding the omission of several proposed allocations in Wombourne by the Publication Plan 2024, it remains a sustainable location for development, benefitting from several local services and amenities and good access to public transport. Bellway welcome the continued allocation of the site off Orton Lane. The southern part of the proposed allocation is currently subject to a live full planning application (ref: 24/00241/FULM) which is accompanied by a full suite of technical assessments and surveys. The proposed development seeks the erection of 32 high quality new homes on the southern part of the proposed allocation (within Bellway's ownership) including bungalows and 31% affordable housing, a new access off Orton Lane, landscaping, and drainage, on a site to the north of Wombourne. There are no constraints to the development of the site, which has been demonstrated by the live planning application and submitted documents.
- In light of the omitted sites in Wombourne and given its inherent sustainability, it is considered to now be receiving a disproportionately small amount of growth in the plan. Sites such as that off Strathmore Crescent, represent an opportunity to provide additional growth in the settlement, adjoining a proposed allocation and rounding off the settlement to the north. The Council's own evidence base demonstrates development on land west of Strathmore Crescent will result in less Green Belt harm, which is reiterated in the *"Landscape and Green Belt*

*Review*” at **Appendix 1**, and the site is of a lower landscape sensitivity than the previously allocated sites off Billy Buns Lane and Gilbert Lane. The site is visually contained by its boundaries, which contributes to its suitability. Its allocation would complement the proposed allocation off Orton Lane. The planning application for the site off Orton Lane (Ref: 24/00241/FULM) incorporates an access design that could serve the additional land to the west.

- Other policies, outlined in our representations submitted in 2022 (**Appendix 1**), are overly prescriptive and therefore not consistent with national policy in terms of ensuring that the policies are sufficiently flexible to meet changing requirements.

5.4 We would welcome the opportunity to discuss the contents of these representations further with Officers and reserve the right to attend any future examination hearing sessions.

**Appendix 1: South Staffordshire Regulation 19  
Publication Document, Statement  
of Representations- December 2022**



# South Staffordshire Regulation 19 Publication Document

## Statement of Representations

Land off Orton Lane and land west of  
Strathmore Crescent, Wombourne

Submitted on behalf of Bellway Homes Ltd

# Contents

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**Client**

**Our reference**  
BELQ3007

December 2022

# 1. Introduction

- 1.1 These representations are made on behalf of Bellway Homes Limited (Bellway), in response to the South Staffordshire Local Plan Review (LPR) Regulation 19 consultation.
- 1.2 Bellway welcome the opportunity to make representations on the final draft version of the Local Plan in terms of soundness and legal compliance.

## The Sites

- 1.3 Bellway is promoting two sites at Wombourne:
  - Land off Orton Lane, Wombourne
  - Land west of Strathmore Crescent, Wombourne

### Land off Orton Lane, Wombourne

- 1.4 Land off Orton Lane is a 3.6ha site to the north of Wombourne (Site Ref: 416). It represents a sustainable and deliverable residential opportunity for a minimum of 79 dwellings, public open space and associated infrastructure.
- 1.5 Along with land to the north (Site Ref: 416a, which is promoted separately by St Philips), the site is proposed to be allocated for a minimum 79 new homes (draft policy SA5, where it is referred to as 'Land off Orton Lane'). Bellway's southern extent of the proposed allocation is currently safeguarded in the adopted Site Allocations Document, as is the north western extent of the allocation, with the remaining north eastern extent still located within the Green Belt.
- 1.6 Development of the site at Orton Lane will help to meet the short-term housing need for the village. The site will deliver much needed affordable housing and open space and a more robust settlement edge than currently offered, and could provide linkages to land to the west (outlined below). There are no constraints to the development of the site.
- 1.7 An *opportunities and constraints plan* (**Appendix 1**) and *framework plan* (**Appendix 2**) has been prepared for the site. These plans demonstrate that around 45 homes can be delivered at the site. We will continue to work with St Phillips to ensure the masterplans for both sites are coordinated and capable of working together. This will include connections between the two sites, as shown on the opportunities and constraints plan.

### Land west of Strathmore Crescent, Wombourne

- 1.8 Bellway controls additional land beyond Orton Lane at Wombourne, to the west of Strathmore Crescent (Site Ref: 708), it adjoins the western boundary of the Orton Lane site (Site Ref: 416). The site has the potential to deliver an additional 40-50 homes, forming an extension of the proposed allocation off Orton Lane. The site would be accessed via the proposed Orton Lane allocation and could offer a new link through to the adjacent railway walk, a *site location plan* enclosed at **Appendix 3**.

- 1.9 As we discuss later, the small scale nature of this site represents a more suitable and sustainable opportunity for growth at Wombourne than the land off Billy Buns Lane and Gilbert Lane (Site Ref: 463 and 284) proposed allocation. It has a more limited impact on the Green Belt given its scale alongside its physical and visual self-containment. The South Staffordshire Railway Walk situated to the west and which provides a permanent, defensible boundary for the site, and further development to the east.
- 1.10 Together with the land to the proposed off Orton Lane, the land represents a comprehensive solution to meeting Wombourne's needs in a single location, which is very well defined by its boundaries.

### **Bellway Homes**

- 1.11 Evolving from a local family business to a FTSE 250 major PLC, Bellway builds exceptional quality new homes throughout the UK, delivering almost 11,000 new homes across the UK in the last year. They are an established five star housebuilder as a result of their emphasis on build quality, customer care and health and safety, and build and sell high quality homes to suit local housing styles as well as providing social housing to housing associations.
- 1.12 Bellway, with their consultant team, have and will continue to seek to work closely with the Council, statutory consultees and other stakeholders through the development plan process, and as the housebuilder for the site with a strong track record for delivery, will ensure careful attention is given to viability and costs in plan-making.
- 1.13 Bellway welcome the opportunity to further engage with the LPR through the Regulation 19 consultation. We respond to the Publication Plan at **Section 2** of these representations and provide a summary at **Section 3**. The statement provides further context to responses set out in the consultation forms which are also submitted on behalf of Bellway Homes.

### **Support for the Plan**

- 1.14 Bellway support the inclusion of the land off Orton Lane and its form as proposed in the draft plan. It is considered that the land west of Strathmore Crescent would complement the existing allocation by utilising shared infrastructure and access to Orton lane, and by linking both sites to the South Staffordshire Way.
- 1.15 Bellway do however have concerns regarding the anticipated delivery rates for Cross Green (though we do not disagree with its principle) and the principle of the proposed allocation on land off Billy Buns Lane and Gilbert Lane. The plan should anticipate less delivery from both sites before 2039 to de-risk the plan and to remedy this identify land elsewhere to ensure the District's needs are met in full, including allocating land at Strathmore Crescent, Wombourne.

## 2. Response to Strategic Draft Policies

### Cross boundary issues and the duty to cooperate, and Strategic Objectives

- 2.1 It is welcomed that the LPR acknowledges from the outset and at paragraph 3.6-3.7, the opportunities section of Table 2 SWOT analysis, and the strategic objectives, and a theme throughout the plan, that unmet housing needs from the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA) is a 'key cross boundary issue' to be addressed through the plan.
- 2.2 Bellway support the vision and strategic objectives set out. Strategic Objective 2 in particular references the need to meet the housing and employment needs of the District whilst making a proportionate contribution towards the unmet needs of the GBBCHMA.
- 2.3 The objectives for high quality housing to meet a wide range of needs and provide beautiful and sustainable places where people want to live are welcomed. The LPR notes the lack of brownfield development sites available within the District, and the requirement for a careful release of suitable Green Belt land to meet housing need.
- 2.4 The strategic objectives of the LPR are sound.

### Policy DS1: Green Belt

- 2.5 Whilst we have no in principle concern with draft policy DS1, the LPR should be drafted as though it is being read once the plan is adopted. The fifth paragraph may therefore need amendment to reflect that the Green Belt boundaries have already been altered, rather than 'will be'.
- 2.6 We would recommend the following modification at draft policy DS1 paragraph 5 to reflect this:

*"The Green Belt boundary ~~will be~~ **has been** altered through this Plan to accommodate development allocations set out in Policies SA1, SA2, SA3, SA5 and SA7" ...*

### Policy DS2: Green Belt Compensatory Improvements

- 2.7 NPPF paragraph 142 states that the removal of land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt. Planning practice guidance clarifies that this could include new or enhanced green infrastructure, woodland planting, landscape and visual enhancements, improvements to biodiversity and habitats, new or enhanced walking and cycling routes, and improved access to new or existing recreational and playing field provision.
- 2.8 Policy DS2 reflects this approach and provides sufficient flexibility to agree a contribution if no specific scheme can be identified.

## Policy DS4: Development Needs

- 2.9 The development needs of South Staffordshire include a proportion of the unmet housing need of the GBBCHMA. The GBBCHMA is made up of 14 different authorities, including Birmingham and the four Black Country authorities. There is no question that there is a significant unmet need arising from the GBBCHMA:
- There is a remaining unmet need of **6,302 homes up to 2031** from the adopted *Birmingham Development Plan* (January 2017), as per the *GBBCHMA fourth position statement addendum* (December 2021).
  - Based on their own assumptions the Black Country has an unmet need of **36,819 homes up to 2039** (the *Black Country Urban Capacity Review Update* (May 2021)). The previous draft of the Black Country Plan proposed allocations to reduce this to circa 28,000 homes, however the plan has now been abandoned and each authority will be preparing its own plan.
  - Birmingham has now commenced a review of its plan. The Issues and Options version is currently published for consultation – that indicates there is a substantial shortfall from the city of circa **78,000 homes up to 2042**.
- 2.10 Given the significant remaining shortfall arising in the GBBCHMA and South Staffordshire’s clear functional relationship with the wider HMA (demonstrated by its travel to work patterns, and transport links with Birmingham and the Black Country), Bellway are therefore supportive of the plan’s proposed contribution to the GBBCHMA’s unmet need. The scale of the contribution and the Council’s approach is justified by the *Greater Birmingham and Black Country Strategic Growth Study* (February 2018).
- 2.11 Nearly all of South Staffordshire’s villages are surrounded by Green Belt, therefore it is inevitable that the District will need to release Green Belt to meet its needs and those of the wider GBBCHMA. As such exceptional circumstances have been clearly demonstrated to alter Green Belt boundaries through the draft plan, in accordance with NPPF paragraph 140.
- 2.12 The ongoing work with neighbouring authorities to agree the contribution to the shortfall is well evidenced, as such the Council has satisfied the duty to cooperate.
- 2.13 The approach to making a contribution to the wider GBBCHMA unmet needs is therefore positively prepared, based on effective joint working, and is consistent with national policy.

## Policy DS5: The Spatial Strategy to 2039

- 2.14 The policy sets out that growth will be directed towards the most accessible and sustainable locations, whilst also ensuring that the natural and historic environment is maintained and enhanced to protect local distinctiveness.
- 2.15 Wombourne is identified as a ‘Tier 2 Settlement’ within the policy. The village benefits from a host of local services and access to public transport, with close proximity to

Dudley and Wolverhampton. Whilst we understand to some degree the rationale underpinning the LPR's settlement hierarchy, its rigid approach does not allow for making judgements on settlements such as Wombourne which has a significant employment offer within Wombourne which is walkable and cyclable and not reliant on public transport. At 43.6ha Wombourne has the **third highest provision of employment land in South Staffordshire** after Penkridge and Codsall / Bilbrook. This is significantly more employment land than other proposed Tier 1 settlements such as Cheslyn Hay / Great Wyrley (30.3ha).

- 2.16 Beyond this Wombourne also benefits from a frequent bus service (every 20 minutes) to Wolverhampton St Georges, just a 20-minute bus journey, therefore rail access is also nearby. Combined with its large retail, Wombourne's employment provision and public transport accessibility clearly justifies it being a Tier 1 settlement.
- 2.17 Growth in Wombourne will be delivered through a combination of new allocations and the release of safeguarded land, such as that at Orton Lane, including the release of Green Belt land, particularly in the north eastern part of the village. The Plan recognises that this area benefits from good proximity to a variety of services and facilities, including regular public transport, as well as "*relatively low Green Belt harm compared to other areas in the district*". It is therefore capable of accommodating more than the level of growth identified for it, including Bellway's land west of Strathmore Crescent, which is discussed further below.
- 2.18 In addition to Wombourne's level in the settlement hierarchy, Bellway also have concerns regarding the spatial strategy's reliance on land at Cross Green, which we comment on in response to draft policy SA2.

### **Policy SA2: Cross Green**

- 2.19 We have no objection in principle to the proposed allocation at Cross Green, however we have some concerns regarding the scale of delivery anticipated for the proposed plan period given infrastructure delivery.
- 2.20 Firstly, there are concerns regarding the access road to ROF Featherstone and the associate costs and the potential impacts on Cross Green's viability and delivery trajectory. The IDP now estimates the cost of delivering the access road at £14.4m-£19m, to be funded via Staffordshire County Council and developer contributions. Evidence should be provided as to how this will be funded. The only funding evidence to date is reference to £1.5m of Growth Deal funding being made available via the Stoke-on-Trent and Staffordshire Local Enterprise Partnership.
- 2.21 Secondly, mindful of the scale of infrastructure delivery at the site, no detailed evidence has been provided to support the site's proposed quantum of housing growth (1,200 new homes).
- 2.22 With the expectation set out in the LDS that the plan will be adopted in December 2023, it is assumed an application will be submitted by summer 2024, at the earliest. *Lichfields' Start to Finish report (February 2020)* identifies that the average lead in time for applications of Cross Green's scale from validation of an application to first delivery is **8.4 years**. This would see first completion in **winter 2033**.

2.23 The Lichfield’s report indicates it is reasonable to assume 160 dwellings per annum (dpa) to be delivered on sites of Cross Green’s scale. This is qualified by *Stafford Borough’s Lead-in Times and Built Rate Assumptions Topic Paper (October 2022)*, which provides evidence for lead in times for sites in Stafford’s neighbouring authorities. Stafford’s only neighbouring authority to provide evidence to the topic paper for sites of 501 homes or more, Lichfield District (who are also a neighbour to South Staffordshire), indicate it is reasonable to assume a ceiling of 150dpa on sites of that scale. Applying 160 dpa on Cross Green from 2031/32 would see the site deliver 1,120 homes, approx. 760 homes less than the proposed allocation.

2.24 Based on the above assumptions the below delivery is anticipated:

2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	Total
40	160	160	160	160	160	160	1,000

2.25 In total, it is therefore assumed that Cross Green will only deliver **around 1,000 new homes** before the end of the plan period, 200 less than the policy assumes.

2.26 The Council should therefore consider preparing further evidence to justify the scale of growth proposed for Cross Green, or whether its scale should be reduced and some of its growth delivered elsewhere in the District (such as Bellway’s site at Strathmore Crescent).

2.27 If the delivery rates cannot be evidenced than the following modification to draft policy SA2 at part a) will be necessary:

2.28 “a) A minimum of ~~1,200~~**1,000** homes”

### **Policy SA5: Housing Allocations**

#### ***Land off Orton Lane (Housing Allocation 416)***

2.29 We continue to support the principle of the release of the safeguarded land at Orton Lane for allocation for housing growth. The site remains suitable, available and achievable, in accordance with Paragraph 68 of the NPPF. It was confirmed through the *Housing Site Selection Topic Paper (2021)* that the “*site’s assessment process has revealed no unmitigable constraints to the delivery of the safeguarded land in Wombourne*”. This was also confirmed through the examination of the SAD as recently as 2018.

2.30 Initial baseline technical work has demonstrated that the site can come forward for development in the short term, so can contribute to the Council being able to maintain their five year housing land supply, and there are no constraints which would limit this. The enclosed framework plan (Appendix 2) demonstrates how the site can be delivered, responding to its constraints. That includes:

- Retaining trees around the site’s boundary and planting additional trees and landscaping



- Delivering a policy compliant level of open space, with the majority of open space at the south eastern extent of the site so it is accessible to both new and existing residents
- Creating a new pedestrian recreational route through the site
- Focusing landmark buildings towards the access to the site
- locating the attenuation pond at the site's lowest point

2.31 It is Bellway's intention to commence pre-application discussions with the Council early in 2023 with a view to submitting an application before summer.

2.32 Bellway control the southern extent of the proposed allocation, St Phillips control the northern extent. Although there will be separate applications made by each party, we are committed to continuing to work together to ensure there is a coordinated approach to delivery.

***Land off Billy Buns Lane and Gilbert Lane (Site Refs: 463 & 284)***

2.33 Land off Billy Buns Lane and Gilbert Lane (Site Refs: 462 and 284) are proposed as allocations for a minimum of 223 dwellings. Bellway consider that their additional land to the west of Strathmore Crescent (Site Ref: 708) is a more sustainable and suitable option for meeting Wombourne's (and the wider District's) housing needs.

2.34 Firstly, the Council's own evidence (*LUC Landscape Sensitivity Study (2019)*) demonstrates that land west of Strathmore Crescent is less visually sensitive (moderate sensitivity) than land off Billy Buns Lane and Gilbert Lane (moderate-high). This is because the landscape to the east of Wombourne is influenced by the adjacent historic landscape and areas such as the area around the Himley Hall Registered Park and Garden. This is not an issue for land to the west of Wombourne, such as land to the west of Strathmore Crescent.

2.35 EDP's *Landscape and Green Belt Review (2021)* (**Appendix 4**) shows that the site has no landscape features of note and there are features present which limit the site's sensitivity. Reflecting this the site is considered to be of low-moderate sensitivity. Furthermore the site presents an opportunity to create a new and permanent settlement edge with a defensible boundary to the wider countryside to the north.

2.36 Secondly, the Council's Green Belt Review (*LUC Green Belt Study (2019)*) also shows that land west of Strathmore Crescent is located in a parcel which represents less Green Belt harm (moderate-high) than land off Billy Buns Lane and Gilbert Lane (very high). Supporting this, the enclosed *EDP Landscape and Green Belt Review (December 2021)* (**Appendix 4**) demonstrates that the three hectares of land to the west of Strathmore Crescent provide a **considerably lower** contribution to Green Belt purposes than land off Billy Buns Lane and Gilbert Lane. As land west of Strathmore Crescent has not been tested under the sub-parcel scenarios to confirm this position, the *EDP Green Belt Assessment* applies the same methodology as the *LUC Green Belt Study (2019)*. The main distinctions are the presence of adjoining residential development at land west of Strathmore Crescent, where it would read as an extension to the existing

residential area, and presence of substantial boundary landscaping physically containing the site to the south and west.

- 2.37 Land west of Strathmore Crescent's lower Green Belt harm is influenced by fact it is visually and physically well contained being bound along its western edge by the railway walk, residential development to the east and south.
- 2.38 Thirdly, there is no reflection in the evidence base regarding the constraints at land off Billy Buns Lane and Gilbert Lane, such as electricity pylons which will either significantly comprise the net developable area of the site or viability if the wires are to be buried under the ground. The net developable area is likely to be further compromised by noise impacts from the adjacent A449. Without further evidence being provided it is unlikely the site will deliver the capacity identified in the plan.
- 2.39 In addition, there are clear synergies of delivering land west of Strathmore Crescent given its location adjacent to the proposed allocation and already safeguarded site at Orton Lane – it would support sustainable patterns of development as per NPPF paragraph 142.
- 2.40 Policy SA5 should therefore be modified to reduce the capacity of land off Billy Buns Lane and Gilbert Lane to reflect its constraints and land west of Strathmore Crescent should be added into the policy for a minimum capacity of around 40 homes.

### 3. Response to Draft Development Management Policies

#### Policy HC1: Housing Mix

- 3.1 Bellway support the core principle of these policies, to create “*mixed, sustainable and inclusive communities*”. However, the prescriptive minimum housing requirements may risk providing the wrong type of housing for Wombourne residents and potentially impact on development viability and delivery.
- 3.2 As such, the policy should be reconsidered to ensure it accords with paragraph 82 of the NPPF and the need for policies to “*be flexible enough to accommodate needs not anticipated in the plan*” and to “*enable a rapid response to changes in economic circumstances.*”
- 3.3 The policy should take a more flexible approach on housing mix to ensure it is consistent with NPPF paragraph 82’s need for policies to “*be flexible enough to accommodate needs not anticipated in the plan*” and to “*enable a rapid response to changes in economic circumstances.*” It also needs to recognise that housing needs vary within different areas and on a site-by-site basis. The policy must ensure that the viability of development proposals is protected whilst providing an appropriate housing mix for the site location and local market. In addition to evidence such as the latest Housing Market Assessment, it would be appropriate for the Council to refer to other evidence including current demand.
- 3.4 We would recommend the following modifications to the third paragraph of policy HC1 to ensure it is consistent with NPPF paragraph 82:

*“On major development housing sites (excluding sites exclusively provided for self-build or custom housebuilding), the market housing ~~must~~ **should** include a minimum of 70% of properties with 3 bedrooms or less, with the specific mix breakdown to be determined on a site-by-site basis and reflective of need identified in the council’s latest Housing Market Assessment, **unless evidence is submitted to demonstrate otherwise**”.*

#### Policy HC3: Affordable Housing

- 3.5 The latest *Housing Market Assessment Update (2022)* identifies a net affordable housing need of between 67 dpa and 156 dpa, dependent on the proportion of household income used spent on housing costs. The *Viability Study (2022)* clearly highlights the challenges in delivering the 30% affordable housing requirement, and highlights that without higher sales values the sites would not necessarily be viable. As such, affordable housing policy should take full account of all evidence in terms of both affordable housing need and viability, and ensure that sufficient flexibility remains.
- 3.6 PPG states that a minimum of 25% of all affordable housing units secured through developer contributions should be First Homes. The NPPF states that planning policies should expect at least 10% of the total number of homes to be available for affordable home ownership. The proposed policy is consistent with these requirements.

- 3.7 However, in relation to affordable housing tenure, existing Core Strategy policy H2 states that the precise proportion of affordable housing tenure split will be agreed with the Council *“having regard to local housing needs within the locality of the development, exceptional circumstances and the effects on the viability of a scheme.”*
- 3.8 The proposed policy should be less prescriptive in terms of tenure mix, to allow sites to best respond to current housing needs with a location and site-specific approach. Impact on scheme viability is referenced in the existing policy H2, and there should also be an allowance for a consideration of site viability, including whether there is a need for new infrastructure etc. which could impact on delivery of the allocated sites. The proposed tenure split for affordable housing is broadly in line with the need evidenced in the *Housing Market Assessment Update 2022*. However, this may change over time and location-specific flexibility should be provided.

#### **Policy HC4: Homes for older people and others with special housing requirements**

- 3.9 Bellway support the provision of accessible homes that are suitable to meet the needs of older people and others with special housing requirements. However, if the Council is to adopt the higher optional standards within the Building Regulations (Part M4(2) Category 2) for accessible and adaptable homes, it should only do so by applying the criteria set out in PPG.
- 3.10 The PPG identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. The Council should provide localised evidence making the specific case for South Staffordshire which justifies the inclusion of **optional** higher standards for accessible and adaptable homes in this policy. If the Council can provide the appropriate evidence and this policy is to be included, then Bellway would support a transition period included within the policy, as appropriate.
- 3.11 The Council should also note that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.
- 3.12 There is a need for policy to be consistent with national standards unless a specific evidenced reason exists for a higher standard to be applied in South Staffordshire.

#### **Policy HC12: Space about dwellings and internal space**

- 3.13 The requirement to meet the Nationally Described Space Standard is considered reasonable. External space standards and amenity spaces should not be explicitly stated within the policy. Whilst there are caveats contained within which state an allowance for flexibility *“depending upon the site orientation and the individual merits of the development proposal”*, planning judgement on a case-by-case basis with reference to the distance/size criteria as guidance rather than policy would suffice to achieve suitable quality residential environments. It must be ensured that specific

criteria do not result in 'planning by numbers' and an unintentional lack of flexibility in assessing future planning applications.

### **Policy HC13: Parking Provision**

- 3.14 Part (e) of the Policy references Appendix I of the Plan which sets out parking standards, in relation to electric vehicles. Bellway support the Council's endeavours to encourage electric vehicle uptake.
- 3.15 Part S of the Building Regulations 'Infrastructure for the charging of electric vehicles' has now taken effect and provides guidance on the installation and location of electric vehicle charge points (EVCPs). It states that a new residential building with associated parking must have access to EVCPs and that their total number must be equal to the number of parking spaces if there are fewer parking spaces than dwellings, or the equal to the number of dwellings where there are more parking spaces. The Regulations also set technical requirements for the charging points these include having a nominal output of 7kW and being fitted with a universal socket.
- 3.16 The policy should avoid repeating electric vehicle requirements which are otherwise secured through Building Regulations and which may risk a lack of accordance with the Regulations should requirements change during the lifetime of the Plan.

### **Policy HC17: Open Space**

- 3.17 The approach of this policy is welcomed, which provides flexibility in terms of the location of any open space – to respond to a site's characteristics to ensure any development maximises recreational use. This is a more appropriate approach than being specific about the potential location of open space, as had been previously proposed by the preferred options consultation.

### **Policy HC19: Green Infrastructure**

- 3.18 The policy will require that all development proposals maximise on-site green infrastructure. The aim of the policy and for the maximisation of on-site green infrastructure is to enhance biodiversity, improve connectivity to existing habitats and enhance the quality of the area for the benefit of residents.
- 3.19 An enhancement in the provision of green infrastructure can be achieved on both sites with buffers to the Green Belt to the north and west.

### **Policy NB6: Sustainable Construction**

- 3.20 The proposed policy approach represents repetition of the 2021 Part L Interim Uplift and the Future Homes Standard. It is the Government's intention to set standards for energy efficiency through the Building Regulations. The higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard negate any need for local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.

- 3.21 The policy states that all residential schemes must also show compliance with a water efficiency standard of 110 litres/person/day. The Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The Optional Technical Housing Standard is 110 litres per day per person. The higher standard proposed within the draft policy has not been justified in accordance with the standard required by the NPPF. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, it should justify doing so by applying the criteria set out in the PPG.
- 3.22 Given the above the policy does not serve a clear purpose. Whilst the policy will require the calculation of the whole life cycle carbon emissions and actions to reduce life cycle carbon emissions, it is not clear how determination will be made as to what is an appropriate level of emissions or reductions. There are also concerns in relation to the elements of the policy regarding performance and monitoring. It is not clear what the Council would do with the information in relation to performance information or the monitoring information once the development is completed.
- 3.23 For the above reasons the policy is not considered to be justified and should be deleted.

### **EC13: Broadband**

- 3.24 Bellway will work to provide modern and future-proof infrastructure provision within sites to be delivered, including broadband connectivity. This reflects Bellway's ambition to provide contemporary, attractive places to live which provide a high-level of connectivity.

## 4. Summary

- 4.1 Bellway welcome the opportunity to engage with the South Staffordshire Local Plan Review (LPR) publication plan regulation 19 consultation.
- 4.2 Bellway are broadly supportive of the publication plan, in particular the overall housing need, the contribution to the Greater Birmingham and Black Country Housing Market Area which is completely justified, and the proposed allocation of land off Orton Lane, Wombourne (housing allocation 416), supported by the plan's evidence base.
- 4.3 Bellway however have the following concerns regarding the plan, which may require remedy:
- Whilst not objecting to principle of Cross Green, the **proposed delivery trajectory is ambitious based on lead in times for significant infrastructure**. On this basis the Council should consider whether further evidence can be provided to justify the scale of growth proposed for Cross Green, of if not then its anticipated delivery before 2039 should be reduced and the associated growth delivered elsewhere in the district, such as land west of Strathmore Crescent in Wombourne.
  - **Bellway's additional land to the west of Strathmore Crescent represents a more sustainable and suitable location for growth at Wombourne than the proposed allocation at and off Billy Buns Lane and Gilbert Lane**. The Council's own evidence base demonstrates development on land west of Strathmore Crescent will result in less Green Belt harm and the site is of a lower landscape sensitivity than land off Billy Buns Lane and Gilbert Lane.
  - **Land to the west of Strathmore Crescent is visually contained by its boundaries, which contributes to its suitability**. Its allocation would complement to proposed allocation off Orton Lane.
  - Other policies, outlined in Section 3 of this statement, are overly prescriptive and therefore not consistent with national policy in terms of ensuring that the policies are sufficiently flexible to meet changing requirements.
- 4.4 We would welcome the opportunity to discuss the contents of these representations further with officers and reserve the right to attend any future examination hearing sessions.

**Appendix 1: Land west of Orton Lane,  
Wombourne opportunities and  
constraints plan**





**Do not scale from this drawing.**  
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- ### DISCUSSION
- Site boundary (1.76ha)
  - ← Proposed site access point
  - Existing trees/hedgerows (& RPA) to be retained (where possible)
  - Priority Habitat Woodland
  - Site of Special Scientific Interest (SSSI)
  - Existing pond (assumed to be infilled)
  - - - Existing Public Rights of Way
  - - - S Staffordshire Railway Walk (Mondarch's Way)
  - ~ Rear/side residential boundary
  - ▨ Draft allocated land (SA5)
  - ← Existing site access point
  - ← Proposed primary street
  - ← Proposed secondary streets
  - ↔ Proposed link to safeguarded land
  - ▨ Indicative residential development area (1.16ha)
  - Indicative LEAP & 20m offset
  - Area reserved for attenuation
  - Pumping station & 10m offset
  - - - Swale
  - Borehole & 10m offset
  - Attenuation tank
  - /// Enhanced boundary planting
  - - - Proposed recreational route
  - ▨ Indicative areas of POS (0.29ha)

Rev.	Date	Description
Land to the west of Orton Lane, WOMBOURNE		
<b>Constraints and Opportunities Plan</b>		
Job ref: 390	Drawing number: SK01	Revision: -
Scale: 1:1,250 @ A3		Date: Nov 2022



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**Appendix 2: Land west of Orton Lane,  
Wombourne framework plan**



**Do not scale from this drawing.**  
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## DISCUSSION

- Site boundary (1.76ha)
- Existing trees/hedgerows (& RPA) to be retained (where possible)
- Existing pond (assumed to be infilled)
- - - Existing Public Rights of Way
- - - S Staffordshire Railway Walk (Mondarch's Way)
- Indicative residential development area (1.13ha)
- Proposed street network
- ┌ Indicative frontages
- \* Landmark buildings
- Focal space
- Indicative LEAP & 20m offset
- Area reserved for attenuation
- Pumping station & 10m offset
- Swale
- Borehole & 10m offset
- Attenuation tank
- Enhanced boundary planting
- Proposed tree planting
- Proposed recreational route

Rev.	Date	Description
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Land to the west of Orton Lane,  
WOMBOURNE

### Framework Plan

Job ref: 390	Drawing number: SK02	Revision: -
Scale: 1:1,250 @ A3		Date: Nov 2022



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**Appendix 3: Land west of Strathmore Crescent  
site location plan**





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**PRELIMINARY**

- Site boundary
  - - - Existing Public Right of Way
  - - - S Staffordshire Railway Walk (Mondarch's Way)
  - Safeguarded land (SAD3)
- OPPORTUNITIES**
- ← Proposed access point
  - ↔ Potential future connections
  - ↔ Visual and landscape connectivity

Rev.	Date	Description
Land to the west of Orton Lane WOMBOURNE		
Potential Phase 2 - Location Plan		
Job ref: 278	Drawing number: SK03	Revision: -
Scale: 1:2,500 @ A3	Date: October 2020	



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## **Appendix 4: EDP Landscape and Green Belt Review (2021)**



**Land at  
Wombourne**

**Landscape and  
Green Belt  
Review**

Prepared by:  
**The Environmental  
Dimension  
Partnership Ltd**

On behalf of:  
**Bellway Homes Ltd**

December 2021  
Report Reference  
**edp7419\_r001b**

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## Appendices

<b>Appendix EDP 1</b>	Findings of EDP Data Trawl
<b>Appendix EDP 2</b>	EDP Green Belt Assessment Methodology and Criteria
<b>Appendix EDP 3</b>	Green Belt Study Assessment Methodology and Criteria

## Plans

<b>Plan EDP 1</b>	Site Context and Designations (edp7419_d001b 10 December 2021 JTF/LTi)
<b>Plan EDP 2</b>	Green Belt Context (edp7419_d002 10 December 2021 JTF/LTi)

*This version is intended for electronic viewing only*

	Report Ref: edp7419_r001			
	Author	Formatted	Peer Review	Proofed by/Date
001_DRAFT	LTi	MW	CM	-
001a	LTi	-	CM	SC 291121
001b	LTi	-	-	-



## Section 1 Introduction and Purpose

### Introduction

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been commissioned by Bellway Homes Ltd to undertake a Landscape and Green Belt Review of a potential development site located within the Green Belt to the north of Wombourne, South Staffordshire. The potential site is situated on a triangular piece of land between Strathmore Crescent to the east and the South Staffordshire Railway Walk in the west (hereafter referred to as the 'site') within the northern extent of the settlement. This report forms part of a promotion of land located in the Green Belt and determines its potential for development.
- 1.2 The site lies within the South Staffordshire Green Belt and is identified as part of Green Belt parcel S53 by the Green Belt Study<sup>1</sup>. The Landscape and Sensitivity Study<sup>2</sup> places it within landscape parcel SL21. It is further mentioned in the Strategic Housing and Economic Land Availability Assessment (SHELAA)<sup>3</sup> as a potential development site.
- 1.3 This report should be read in conjunction with the Environmental Context Plan provided at **Plan EDP 1**. The site is illustrated on **Figure EDP 1.1** below.



**Figure EDP 1.1:** Aerial Image showing site location.

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<sup>1</sup> LUC (2019), South Staffordshire Green Belt Study, South Staffordshire District Council

<sup>2</sup> LUC (2019), South Staffordshire Landscape Sensitivity Study, South Staffordshire District Council

<sup>3</sup> South Staffordshire Council (2020), SHELAA, accessed at *SHELAA & 5 Year Housing Land Supply South Staffordshire Council* ([sstaffs.gov.uk](http://sstaffs.gov.uk)) on 04.11.2021

- 1.4 EDP is an independent environmental planning consultancy with offices in Cirencester, Cardiff and Cheltenham. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website ([www.edp-uk.co.uk](http://www.edp-uk.co.uk)).
- 1.5 The purpose of this Landscape and Green Belt Review is to assess the extent to which the site performs, in landscape and visual terms, in relation to its contribution to the purposes of the Green Belt as outlined in the National Planning Policy Framework (NPPF)<sup>4</sup>. The Green Belt review provides a site-specific evaluation to supplement the existing, wider Green Belt Review and to determine the suitability for development.
- 1.6 The landscape and visual review evaluates the site's sensitivity to development in relation to the existing Landscape Sensitivity Study, and the Council's contentions in relation to this; in particular that the site is of higher sensitivity to other land around the settlement.
- 1.7 EDP's work has included the following key strands:
- A review of relevant planning policy and context;
  - A desktop study and web search of relevant background documents and maps;
  - A field assessment of local site circumstances, undertaken by a qualified landscape architect, including a photographic survey of the character and context of the site and its surroundings; and
  - A summary of the key constraints and opportunities identified through desk study and site analysis undertaken by EDP.

---

<sup>4</sup> National Planning Policy Framework (2021), Ministry of Housing, Community and Local Government, London

## Section 2 Planning Context

### Planning Context

- 2.1 Relevant planning policy in relation to the Green Belt designation and matters relating to landscape and visual circumstances have been reviewed and are summarised below.

#### **National Planning Policy Framework (NPPF)<sup>5</sup>**

- 2.2 The NPPF requires land to demonstrate that it contributes towards the essential characteristics of openness and permanence by meeting one or more of five purposes, or ‘tests’, of Green Belt designation, which are set out at Paragraph 138 as follows:
1. *“To check the unrestricted sprawl of large built-up areas;*
  2. *To prevent neighbouring towns merging into one another;*
  3. *To assist in safeguarding the countryside from encroachment;*
  4. *To preserve the setting and special character of historic towns; and*
  5. *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*
- 2.3 For each NPPF purpose, EDP has defined criteria that allows for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the open character of the Green Belt in this location.
- 2.4 Paragraph 140 highlights the possibility to review and alter Green Belt boundaries, where exceptional circumstances have been identified and justified. *“Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans”.*
- 2.5 Planning practice Guidance (PPG) for the NPPF notes that where land is released from the Green Belt, “compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land” should be considered.

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<sup>5</sup> National Planning Policy Framework (2021), Ministry of Housing, Community and Local Government, London

**South Staffordshire Core Strategy (December 2012)<sup>6</sup>**

- 2.6 The South Staffordshire Core Strategy (SSCS) provides an overview of policies and strategies which will shape future development in the district. The following is a summary of relevant planning policy.
- 2.7 The Core Strategy outlines the strategic objectives for the district. Strategic Objective 1 states that the Council aims to “*protect and maintain the Green Belt and Open Countryside in order to sustain the distinctive character of South Staffordshire*”. Strategic Objective 2 further identifies the goal to “*protect and retain the important strategic gaps between existing settlements*”. Strategic Objective 4 states that the plan aims to “*protect, conserve and enhance the countryside, character and quality of the landscape*”.
- 2.8 Policy GB1: Development in the Green Belt identifies development that would be considered appropriate within the Green Belt designation. This includes new buildings for:
- “*c) affordable housing where there is a proven local need in accordance with Policy H2*”
- 2.9 Core Policy 2: Protecting and Enhancing the Natural and Historic Environment outlines opportunities for development which would be supported by the Council. This includes development that:
- “*b) are not contrary to the control of development within internationally, nationally or locally designated areas including the Green Belt and Open Countryside [...]*”; and
- “*e) provide mitigation or compensatory measures to address any potential harmful implications and supporting enhancement measures*”.
- 2.10 Policy EQ4: Protecting and Enhancing the Character and Appearance of the Landscape states that the typical “*rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced*”. It emphasises the need for development proposals to be appropriate within their context with regards to scale, layout and location.

**Strategic Housing and Economic Land Availability Assessment (SHELAA)<sup>7</sup>**

- 2.11 The SHELAA provides an overview of sites that are suggested for potential housing or employment development. The site is included as site 708, which is identified as “*potentially suitable but subject to policy constraints*”.

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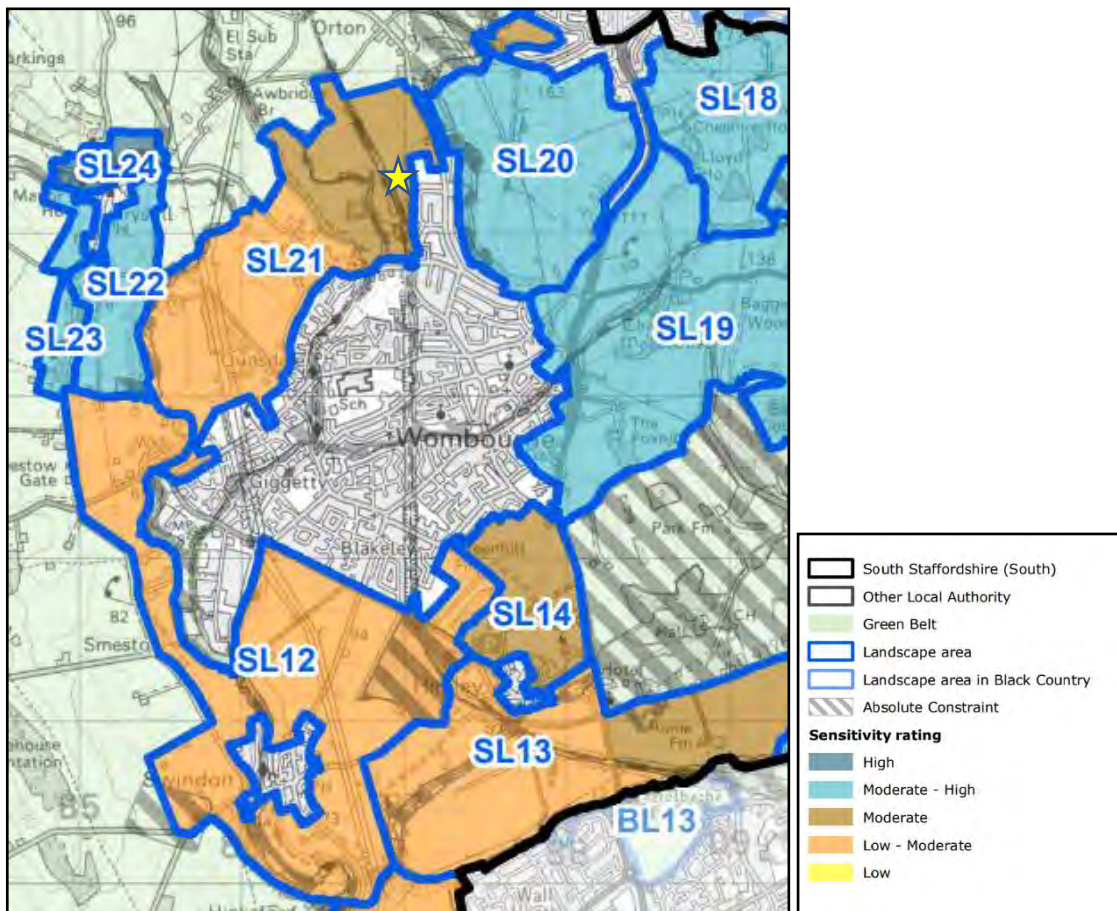
<sup>6</sup> South Staffordshire Council (2012), Core Strategy Development Plan

<sup>7</sup> South Staffordshire Council (2020), SHELAA, accessed at SHELAA & 5 Year Housing Land Supply South Staffordshire Council (sstaffs.gov.uk) on 04.11.2021

## Section 3 Landscape Context

### South Staffordshire Landscape Sensitivity Study (2019)<sup>8</sup>

- 3.1 The South Staffordshire Landscape Sensitivity Study considers the sensitivity of land to potential built development within the Green Belt designation in South Staffordshire. Wombourne is identified as a main service village within the district. The site is located in the eastern part of landscape area SL21 (as shown on **Figure EDP 3.1**).



**Figure EDP 3.1:** Location of landscape parcel SL21 (indicated by the yellow star).

- 3.2 Areas of land on the settlement edge with semi-rural land-uses are identified as potentially sensitive to built form “due to their role in providing a perceived gap and preventing coalescence between the wider conurbation and individual villages, such as Wombourne”. It highlights the opportunity for landscape features to “provide significant boundary features separating urban areas from the surrounding countryside”.
- 3.3 The study identifies SL21 as having both a low to moderate, and also moderate, landscape sensitivity. The site falls within the eastern extent of the landscape area, which is classed

<sup>8</sup> LUC (2019), South Staffordshire Landscape Sensitivity Study

as having moderate sensitivity. The study defines moderate sensitivity as landscape which has “*some distinctive characteristics and valued qualities, with some sensitivity to change as a result of introducing built development.*”

- 3.4 The study provides a wider overview of the whole landscape area SL21. This is limited in identifying the site’s sensitivity to development. While it provides a useful overview to the landscape’s condition, it is not considered to assess the site’s sensitivity in sufficient detail. A detailed assessment of the site in relation to the Green Belt designation is provided in **Section 5** of this report.

### **Environmental Designations**

- 3.5 This section summarises the relevant landscape and environmental designations within 1km of the site boundary. Further information is provided on **Plan EDP 1**.

### **Public Rights of Way (PRoW)**

- 3.6 There are no Public Rights of Way (PRoW) located within the site. The following footpaths are located within 1km of the site:

- The Monarch’s Way long distance footpath lies approximately 10m west of the site;
- Footpath Wombourne 23 follows the eastern boundary of the site;
- Footpath Wombourne 20 approximately 600m to the north of the site;
- Footpath Lower Penn 2 approximately 720m to the north of the site;
- Footpath Wombourne 42 approximately 220m to the north-east of the site;
- Bridleway Wombourne 16 approximately 650m to the east of the site;
- Bridleway Wombourne 15, approximately 650m to the east of the site;
- Footpath Wombourne 17, approximately 530m to the east of the site;
- Footpath Wombourne 24, approximately 640m to the south of the site; and
- Footpath Trysul and Seisdon 13 lies approximately 940m to the west of the site.

### **Sites of Special Scientific Interest (SSSI)**

- 3.7 There are no Sites of Special Scientific Interest (SSSI) present within the sites. The South Staffordshire Railway Walk is a linear SSSI that lies immediately to the west of the site.

### **Conservation Areas**

3.8 There are no Conservation Areas present within the site. The following Conservation Areas are located within 1km of the site:

- Wombourne Conservation Area, approximately 890m to the south-east of the site; and
- Staffordshire and Worcestershire Canal Conservation Area approximately 550m to the west, following the Canal's route.

### **Heritage Assets**

3.9 There are no heritage assets located within the site. There are seven listed features within 1km of the site. These include:

- Grade II listed Orton Grange approximately 620m to the north;
- Grade II listed White Cross House approximately 780m to the north;
- Grade II listed Orton House and attached stable approximately 990m to the north;
- Grade II\* listed The Bratch Water Pumping Station approximately 380m to the south - west;
- Grade II listed Staffordshire and Worcestershire Canal Bratch Locks, Bridge No 47 and toll house approximately 390m to the south-west; and
- Grade II listed Staffordshire and Worcestershire Canal Cottage at Bumblehole Lock approximately 900m to the south-west.

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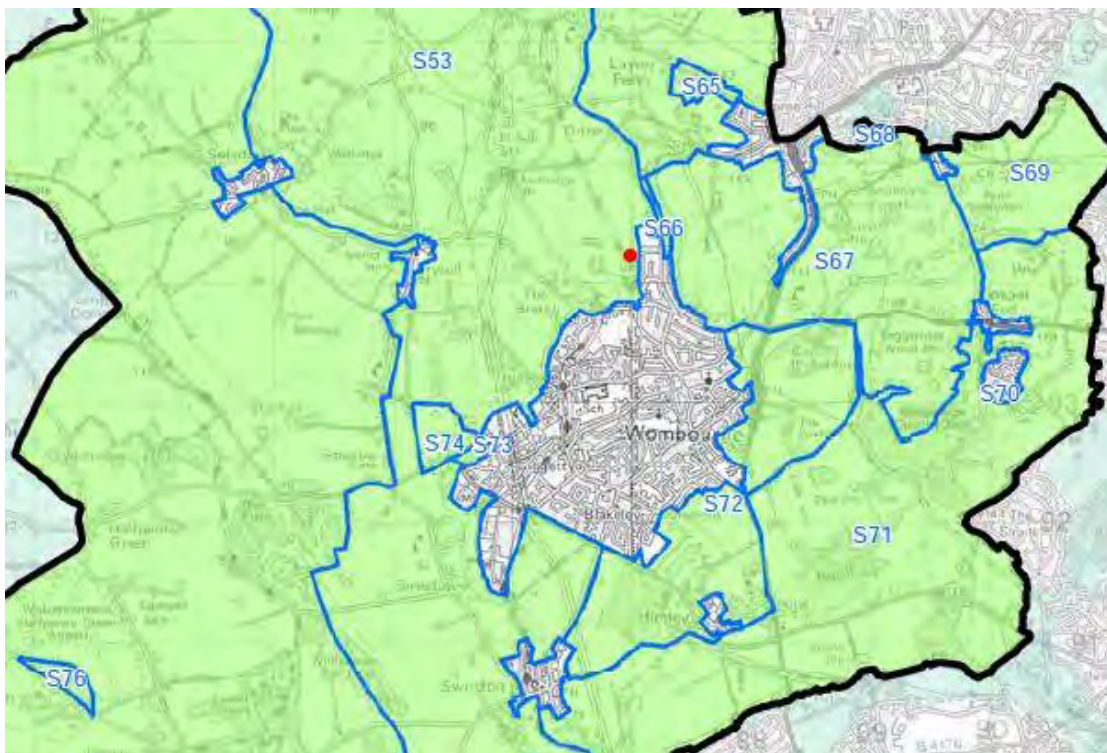


## Section 4 Green Belt Context

### South Staffordshire Green Belt Study<sup>9</sup>

4.1 The site lies within the South Staffordshire Green Belt to the north of Wombourne. The Green Belt study is divided into two parts, which summarise the condition and contribution of identified parcels to the purposes of the Green Belt and then go on to evaluate their sensitivity in relation to development. The site, which covers an area of approximately 3 hectares (ha), is identified as Parcel S53 (as shown in **Figure EDP 4.1**), which extends north beyond Pattingham and has an overall area of 3,072ha. Generally, the study highlights the following in relation to the parcel:

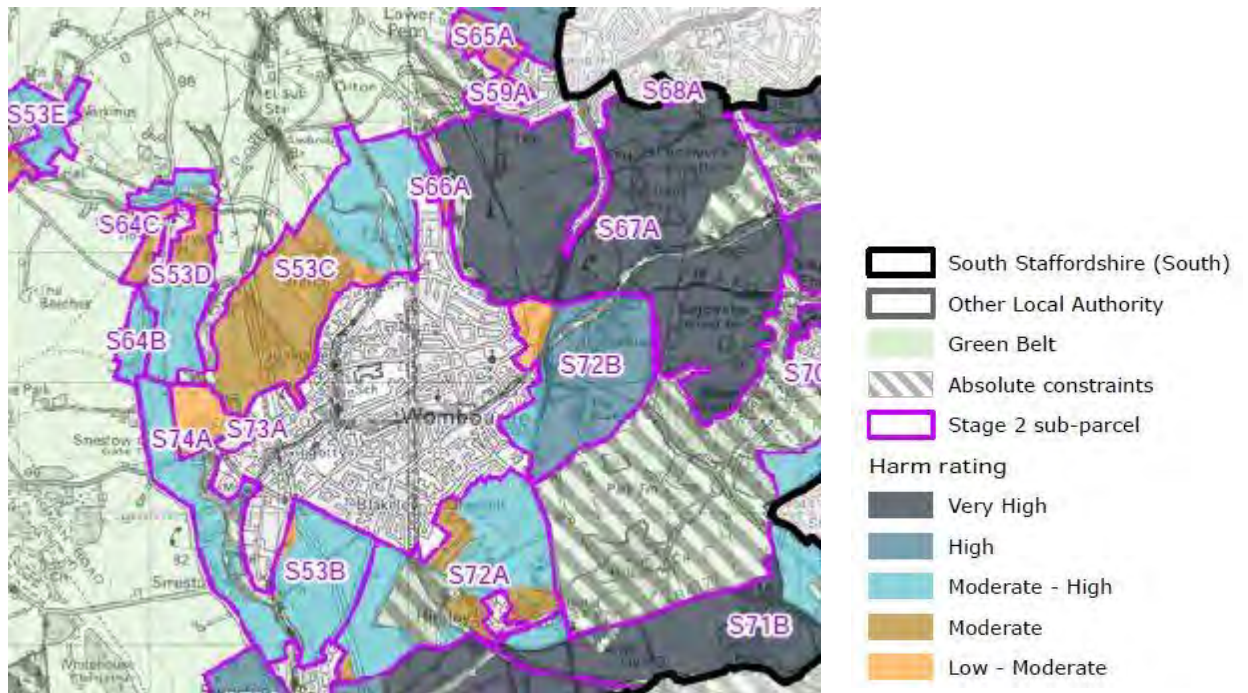
- Parcel S53 is noted as having moderate contribution to purpose 1 of the Green Belt;
- It has weak or no contribution to purpose 2 and 4 of the Green Belt; and
- It has strong contribution to purpose 3 of the Green Belt.



**Figure EDP 4.1:** Extract from Green Belt study showing location of the site (red dot) in relation to identified Green Belt parcel S53.

<sup>9</sup> LUC (2019), South Staffordshire Green Belt Study, South Staffordshire District Council

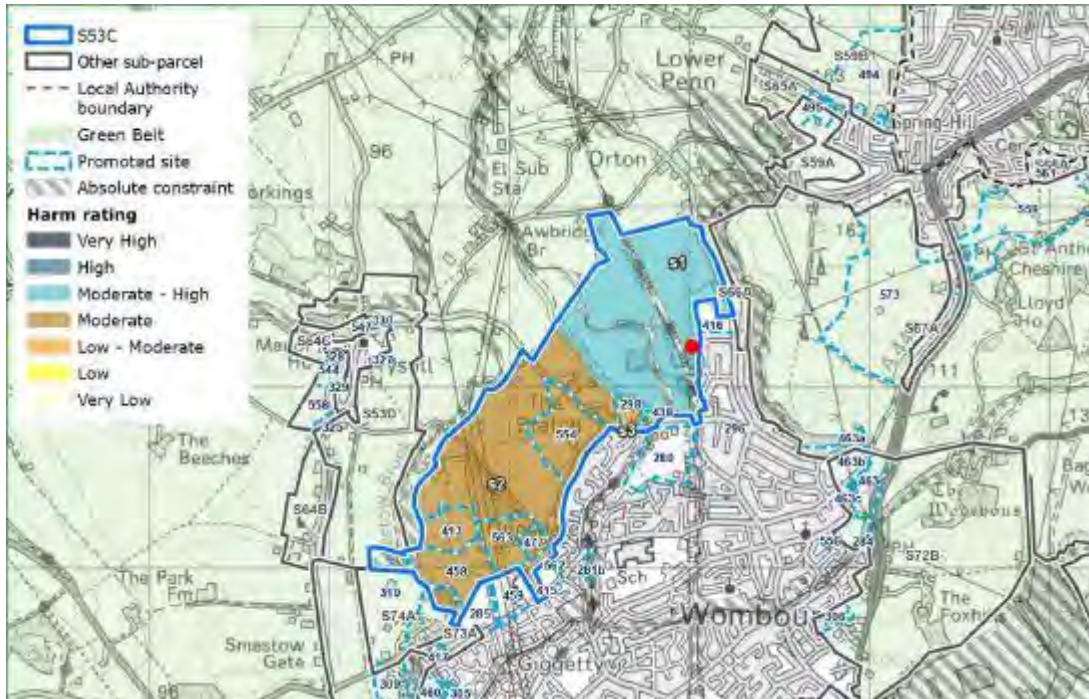
- 4.2 The parcel is further divided into sub parcels, of which the site falls into Parcel S53C (as shown in **Figure EDP 4.2**). The site is located in the eastern extent of the parcel, which is noted as having moderate to high harm rating.



**Figure EDP 4.2:** Extract from Green Belt Study showing Green Belt Parcel S53 C and sensitivity to development.

- 4.3 The study further places the site within sub parcel S53C. This is further divided into parcels of development scenarios and any release of land “to the north of the Staffordshire and Worcestershire Canal” is placed within sub parcel S53C-S1 (as shown on **Figure EDP 4.3**) and is evaluated as being of moderate to high sensitivity. The site covers a small part of the overall parcel, which extends to the west and covers an area of approximately 61.85ha. The study states that the sub parcel “makes a strong contribution to preventing encroachment on the countryside and a moderate contribution to preventing sprawl of the West Midlands conurbation”. However, it does note that “there is no strong distinction between this relatively flat sub-parcel and the inset settlement edge of Wombourne”. The parcel is separated from the wider West Midlands conurbation through woodland and topography to its north-east. “Reduction in physical distance between Wombourne and Wolverhampton would still constitute some weakening of the integrity of the Green Belt gap”.





**Figure EDP 4.3:** Extract from Green Belt Study showing the site (red dot) within Sub-Parcel S53C and S1.

- 4.4 While the Green Belt Study gives an overview of the wider condition of the Green Belt of the larger parcel, it is not specific to the site itself and as such is not considered to accurately represent its actual sensitivity in relation to the wider landscape. **Section 6** provides a detailed review of the Green Belt designation in relation to the site and how it performs in relation to the purposes of the Green Belt. Given the size of the parcels defined by the LPA thus far, this is considered an essential step in understanding the role it plays in this respect.

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## Section 5 Landscape and Visual Review

- 5.1 This section considers landscape and visual matters. It provides a baseline review of the site's current condition and evaluates its general sensitivity to development.

### Landscape Character

#### **National Character Area (NCA) 66: Mid Severn Sandstone Plateau<sup>10</sup>**

- 5.2 The site falls within National Character Area 66: Mid Severn Sandstone Plateau. The area is described as a well wooded landscape with “blocks of mixed woodland and old orchards”. Large open fields and weak hedgerow patterns are described as characteristic features. While this gives a general understanding of the higher-level landscape character, it is not a detailed representation of characteristics present within the site and surrounding area.

#### **Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996-2011, Volume 3: Landscape Descriptions (2000)<sup>11</sup>**

- 5.3 The Landscape Descriptions document provides a more extensive evaluation of the regional character of areas within the NCA that lie within Staffordshire. The regional landscape is divided into two Landscape Types (LTs) – Ancient Redlands and Sandstone Estatelands, which are further divided into landscape character areas (LCAs). The site lies within the Sandstone Estatelands LT. Relevant extracts are provided in **Appendix EDP 1**. Key characteristics are:

- *“Settlement is sparse and characterised by expanded hamlets and wayside cottages”;*
- *“Rolling landscape gives way to flatter land along the river valleys, but there are dominant ridge features with scarp slopes”;* and
- *“A landscape that appears far more wooded than it is, with prominent positioning of woodlands and the coalescence of mature hedgerow oaks in places.”*

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<sup>10</sup> Natural England (2014), NCA 66: Mid Severn Sandstone Plateau, accessed at <http://publications.naturalengland.org.uk/publication/5001578805198848?category=587130> accessed on 08.11.12

<sup>11</sup> Staffordshire County Council Development Services Department (2000), Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996-2011, Volume 3: Landscape Descriptions, Staffordshire County Council

5.4 The site falls within LCA Sandstone Estatelands: farmland. Relevant extracts are provided in **Appendix EDP 1**. Key characteristics are:

- *“Landscape of intensive arable farming on flat to very gently undulating landform characterised by very sparse scattering of isolated mature oak trees and hedgerows”;*
- *“Local river courses and canal do not have a high visual impact but their presence is associated with increased tree cover in the valleys”;* and
- *“Long views out to rising ground”.*

5.5 The Landscape Descriptions provide an overview of the local landscape character. While the site and its immediate context feature some elements described within the character assessment, it is generally too broad to effectively comment on the site’s condition and appearance.

#### **Site Character**

5.6 The above gives an indication of the site’s landscape character context on a regional and national level. With regards to the site itself, the following is an assessment of the site character undertaken by EDP:

- Triangular field which has distinctive boundaries to the east and west but is visually open to the north with a post and wire fence marking the boundary;
- Equestrian land use as a paddock for horses, with grassland and scrub present within the site;
- Predominantly flat, low-lying landscape with slight undulations making the southern part of the site slightly higher than the northern part;
- Well-vegetated western and southern boundary; and
- Strong visual relationship with residential development to the east which has urbanising influence on the site.

5.7 The site lies within landscape parcel LS21 which forms part of the Green Belt to the north of Wombourne. It’s bound by post and wire fencing to the north and forms part of a wider network of irregularly shaped fields and pastures located between Orton Lane to the east and the South Staffordshire Railway Path to the west (as shown on **Figure EDP 5.1**). The site appears to be well-used as an equestrian field and popular for recreation.





**Figure EDP 5.1:** View from PRoW Wombourne 23 looking towards the northern boundary of the site, illustrating the boundary treatment within fields and the dense vegetation along the disused railway line.

- 5.8 Residential dwellings back onto and form the eastern boundary of the site. The north-eastern boundary is formed by shrubs which bound a field to the north-east of the site, which is allocated site 416 for housing development. Several residential properties have created informal access points to the site (as shown on **Figure EDP 5.2**). A public footpath follows the site's eastern boundary. While the majority of the vegetation along this side of the site is ornamental and of limited landscape and habitat value, there are two significant oak trees of note located within residential land (as shown on **Figure EDP 5.3**).



**Figure EDP 5.2:** Informal access to the site from residential properties.





**Figure EDP 5.3:** Oak trees within residential properties form focal points along the site's eastern boundary.

- 5.9 A dense area of vegetation forms the site's boundary to the south. The tree lined South Staffordshire Railway Path lies immediately to the west of the site. The topography is predominantly flat, with undulations visible in the distance to the north and north-east of the site. The site itself slopes slightly from the south to the north, where it becomes level with the railway path.



**Figure EDP 5.4:** Dense vegetation, with mainly mature trees and some understorey shrub planting, forms the site's southern and western boundary.



### **EDP Site Appraisal**

- 5.10 Generally, the site benefits from well-vegetated boundaries to the south and west and is defined by its equestrian land use. However, residential development along Strathmore Crescent to the east of the site has an urbanising influence and detracts from its rural character. Access points from the residential properties among ornamental hedges and fences further detract from the site's rural appearance.
- 5.11 The wider landscape area beyond the settlement edge and the immediate area of residential development forms part of the wider countryside surrounding Wombourne. Characteristic features such as tree and woodland groups and hedgerows form field boundaries and focal points, making the eastern extent of parcel SL21 a moderately sensitive landscape to development, as noted in the Landscape and Sensitivity Study.
- 5.12 In contrast to this, the site generally has no notable landscape features aside from vegetation along its boundaries and is strongly influenced by adjacent development. As a result, the site is considered to be in discordance with the eastern part of landscape parcel SL21 and to exhibit a low to medium sensitivity in landscape terms, which is consistent with the Low to Moderate score of the remainder of parcel SL21 to the west (see **Figure EDP 3.1** in **Section 3**).
- 5.13 While it does not currently form a defensible boundary to the Green Belt, it has potential to create a strong and permanent boundary to the existing settlement given its location, its juxtaposition with the adjacent settlement and allocated site 416, its boundaries and the potential for additional structural landscaping along the northern boundary. As per the Landscape Sensitivity Study, the wider character of the area enables notable landscape features such as tree groups and areas of woodland to *“provide significant boundary features separating urban areas from the surrounding countryside”*.

### **Visual Matters**

- 5.14 A site visit was undertaken in November 2021, to provide site photography and determine the visibility of the site in relation to the surrounding area. This section considers the visual amenity of the site.
- 5.15 From the north, there is no intervening built form or vegetation to screen views to or from the site. As a result, open views are available towards the wider countryside to the north of the site (see **Figure EDP 5.5**).



**Figure EDP 5.5:** View looking north beyond the site's boundary and towards the wider countryside.

- 5.16 From the east, views are limited due to the residential development adjacent to the site. Views are restricted to close-range views as a result of the intervening built form. There is visibility of the site from residential roads adjacent to the site (as shown in **Figure EDP 5.6**).



**Figure EDP 5.6:** Visibility of the site from residential roads, showing the dense boundary vegetation on the site's western boundary.

- 5.17 There are no views of the site beyond Orton Lane due to the extensive tree cover at Ladywell Wood to the east of Orton Lane. Furthermore, due to topographical undulations to the north-east of the site, there is no visibility of the site in long-distance views. Generally, the site would integrate with the settlement boundary and is not easily discernible from further afield.



- 5.18 From the south, visibility of the site is limited due to the extensive area of vegetation surrounding the Railway Café between the site and residential properties along Bratch Lane. From within the site, tops of residential dwellings can be glimpsed beyond the treeline.
- 5.19 From the west, visibility of the site is restricted due to the flat topography and the extensive tree belt along the western site boundary. Views from the Staffordshire Railway Walk would be screened through the extensive vegetation (as shown in **Figure EDP 5.7**). Furthermore, the railway path is partly within cutting, so that visibility of the site from the footpath is further restricted. Beyond close-range views there would be limited to no visibility of the site.



**Figure EDP 5.7:** View of South Staffordshire Railway Path along western boundary of the site, dense tree cover limits views of the site to glimpsed views of its northern extent through the trees.

- 5.20 The dense belt of vegetation along the site's western boundary is noticeable from further afield. As shown in **Figure EDP 5.8**, It forms a marked dissection of the landscape and screens views of the site.



**Figure EDP 5.8:** View from South Staffordshire Canal looking east towards the site's western boundary, which forms a distinctive line of trees within the landscape.

- 5.21 Generally, the site is visually contained on all sides except from the north. The visual relationship with the residential development to the east defines the site's visual character. From the north, the site appears to sit on the settlement edge due to its close relationship with the adjacent residential development.

### **Summary of Landscape and Visual Review**

- 5.22 From a landscape perspective, there are no landscape features of note located within the site and the site is not subject to a landscape designation. While the site benefits from its distinctive boundary vegetation, it makes a limited overall contribution to the quality of the local landscape. The visual influence from the adjacent residential development to the east has an urbanising effect and detracts from the site's rural appearance. The site is generally visually contained by boundary vegetation and residential development.
- 5.23 Furthermore, land to the north-east of the site has been allocated for development (parcel 416) and would increase the urbanising influence on the site. The site is considered to be in discordance with the Landscape Sensitivity Study and does not contribute to the general quality of the wider landscape parcel SL21. This stems from the sensitivity assessment (necessarily) considering much larger land parcels. The above review shows that a low to medium sensitivity, rather than the moderate identified in the Sensitivity Study, is more appropriate.

- 5.24 The site is visually contained from the east and west. The well vegetated western boundary forms an effective visual buffer to the site (as shown in **Figures EDP 5.7** and **5.8**). The residential development to the east forms a physical barrier which restricts visibility of the site to close-range views.
- 5.25 From a visual perspective, the site reads as part of the settlement edge. Development within the site would have the potential to connect with residential development at Strathmore Crescent. Development within the site would also be able to connect with the allocated site to the north-east. This would integrate new development on the site with existing development so that it is perceived as an extension to the adjacent properties along the settlement edge. Generally, the site forms a small part of the parcel SL21 and development would be a marginal extension into the wider parcel alongside existing development to the east and allocated land to the north-east of the site.
- 5.26 The existing vegetation along the site boundary could be enhanced to strengthen the western boundary and the eastern boundary. New vegetation could be introduced to the north to create a new, clearly defined, permanent settlement edge to the site and the allocated site to the north-east. By increasing the boundary vegetation, views from the wider countryside would benefit from an attractive backdrop. There is also an opportunity to introduce structural planting within the site to link to existing green infrastructure elements outside of the site and add to the local network of landscape and habitat features.
- 5.27 The site provides an opportunity to create a clearly defined permanent settlement edge. There is potential to provide additional vegetation and tree cover to the north of the site and would create a distinctive, defensible edge to the Green Belt designation. This would be in accordance with the local vegetation patterns and would link existing features within the local context.

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## Section 6 Green Belt Review

### Green Belt Review

- 6.1 This section contains an appraisal undertaken by EDP of the site in relation to its contribution to the Green Belt. **Table EDP 6.1** presents the assessment of the wider Green Belt parcel S53C as per the Council's Green Belt Study and applies the same methodology (provided for clarity at **Appendix EDP 3**) specifically to the site. Whilst an assessment based on EDP's methodology has been undertaken at **Table EDP 6.2** to **Table EDP 6.5**, it is useful to be able to compare like with like, so that a direct comparison can be made.

**Table EDP 6.1:** Local Authority Green Belt Study Methodology Applied to Parcel and Site.

<b>Assessment of Parcel and Site Contribution to Green Belt Purpose</b>				
<b>GB Purpose and Criteria</b>	<b>Green Belt Study Assessment of Parcel S53C <sup>12</sup></b>	<b>Green Belt Study Rating</b>	<b>EDP Site-Specific Assessment</b>	<b>EDP Site-Specific Rating</b>
<b>P1: Checking the unrestricted sprawl of large built-up areas</b>	Land contains no or very limited urban development and has strong openness. It is close enough to the large built-up area to have some association with it, but also retains some distinction.	<b>Moderate</b>	The site lies adjacent to residential development. While it is open to the north and has views of the open countryside, the site strongly relates to the adjacent development. The site is contained by boundary vegetation to the south and west and by development to the east. New development within the site would read as an extension to the existing residential development.	<b>Moderate to Weak/No Contribution</b>
<b>P2: Preventing the merging of neighbouring towns</b>	Land plays no significant role due to the distance between the West Midlands conurbation and the nearest neighbouring town.	<b>Weak/No Contribution</b>	The site does not play a significant part in preventing the merging or coalescence of towns.	<b>Weak/No Contribution</b>

<sup>12</sup> LUC (2019), South Staffordshire Green Belt Study, South Staffordshire District Council



<b>Assessment of Parcel and Site Contribution to Green Belt Purpose</b>				
<b>GB Purpose and Criteria</b>	<b>Green Belt Study Assessment of Parcel S53C <sup>12</sup></b>	<b>Green Belt Study Rating</b>	<b>EDP Site-Specific Assessment</b>	<b>EDP Site-Specific Rating</b>
<b>P3: Safeguarding the countryside from encroachment</b>	Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	<b>Strong</b>	The adjacent residential development has an urbanising influence on the site. While the site itself is open and has visual connection to the wider countryside to the north, the site relates strongly to the existing development. Its western boundary could form a permanent boundary to the Green Belt.	<b>Weak/No Contribution</b>
<b>P4: Preserve the setting and special character of historic towns</b>	Land does not form part of the setting of a historic town.	<b>Weak/No Contribution</b>	The site does not form part of the setting of a historic town.	<b>Weak/No Contribution</b>
<b>P5: Assist in urban regeneration, by encouraging recycling derelict and other urban land</b>	All parcels are considered to make an equal contribution to this purpose.	<b>Strong</b>	The site is located within the Green Belt and would not encourage the regeneration of existing derelict or urban land.	<b>Strong</b>

6.2 **Table EDP 6.1** highlights the differences between the wider Green Belt parcel and the site's specific contribution to the Green Belt purposes. The site forms a small part of the wider parcel and makes a more limited contribution to the purposes of the Green Belt, particularly those relating to countryside encroachment and potential urban sprawl. The containment of the site on three sides by either development, strong and permanent boundaries or allocated residential development sites, means that it is inherently less 'open' and has a much moderated sensitivity to development than suggested by the Green Belt Study.

6.3 **Table EDP 6.2 to 6.5** evaluate the site's contribution to the purposes of the Green Belt based on EDP's methodology provided in **Appendix EDP 2**. The following tables analyse the site's contribution in detail and provide commentary on its condition.



**Table EDP 6.2:** Review of Contribution to Green Belt Purpose 1.

<b>Purpose 1: To check the unrestricted urban sprawl of large built up areas</b>		
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
Does the site form a contiguous open buffer between the existing settlement edge and the other settlement areas/ wider countryside?	<p>The site is fully located within the South Staffordshire Green Belt. The site lies to the north of the settlement edge of Wombourne, which is identified as one of the largest villages in South Staffordshire by the local plan. While it forms a noticeable gap on the settlement edge, its proximity to residential development on its eastern boundary diminishes this effect. Residential properties at Strathmore Crescent form the site's eastern boundary and are visible from within the site. Additionally, land to the north-east of the site has been allocated for development and would enhance this effect once development is undertaken in this area.</p> <p>While there is no development within the site, the visual connection with the adjacent properties, both existing and proposed, heavily restricts the perceived distinction between the settlement edge and the wider countryside.</p>	<b>Low to Moderate Contribution</b>
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
Are there any defensible boundaries?	<p>Visually, the development site is contained on three sides. The site is open to the north and has no clearly defined boundary to the wider countryside. Residential development forms the eastern boundary and is clearly visible from within the site and limits views due to the intervening built form. Dense vegetation to the south reduces visual connectivity with the settlement edge. Its densely vegetated boundary along the South Staffordshire Railway Path to the west forms a strong boundary to the site. Of these boundaries, the most notable is the western boundary.</p> <p>The overall character of the site is considerably influenced by the adjacent residential development. The site provides an opportunity to create a new, permanent boundary to the current edge of the Green Belt.</p>	<b>Low Contribution</b>

**Table EDP 6.3:** Review of Contribution to Green Belt Purpose 2.

<b>Purpose 2: To prevent neighbouring towns merging into one another</b>		
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
Is the site well associated with the existing settlement edge?	The site is well associated with the settlement edge. It abuts residential development at Strathmore Crescent to the east, and the allocated site north of this.	<b>Low Contribution</b>

<b>Purpose 2: To prevent neighbouring towns merging into one another</b>		
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
What is the distance between the site and the next nearest settlement edge and what is the effect of the perceived and actual intervisibility on potential for coalescence?	<p>The site's northern boundary is approximately 780m to the south of Orton village and 940m to the south-west of the outskirts of Wolverhampton. Due to the intervening vegetation and the undulating landform to the north-west of the site there is no perceived intervisibility with these settlements.</p> <p>Overall, it is considered that extension of the settlement edge into the site would not be easily discernible from the next nearest settlements. Furthermore, there is potential to create a new, permanent settlement boundary to the north of the site which would further limit intervisibility.</p>	<b>No contribution</b>

**Table EDP 6.4:** Review of Contribution to Green Belt Purpose 3.

<b>Purpose 3: To assist in safeguarding the countryside from encroachment</b>		
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
How representative is the site of the key characteristics of the countryside?	<p>The site lies within the Sandstone Estatelands LCT and the Sandstone Estatelands: Farmland LCA as defined by the Landscape Descriptions (see more detail in <b>Section 3</b>).</p> <p>The site lies within the flatter land of the river valley which is described as a characteristic topographical feature of this area. As per the LCT, strategically located areas of woodland and lines of trees, such as the site's western boundary, make the wider landscape appear more wooded than it actually is. The site's views of the wider countryside to the north, with noticeable undulations as there is a slight rise in topography in the background, are also noted as a characteristic feature.</p> <p>The site benefits from a distinctive, vegetated boundary along its western border, which represents a typical character feature of the local landscape character. Trees and woodland groups are strategically positioned throughout the landscape and create an appearance of a well-wooded landscape, despite there being limited tree cover.</p> <p>As a result, it is considered that the site is partially representative of the local landscape character. The proximity to residential development in the east and the strong visual connection with the area of built development detracts from these character features. The western boundary forms a distinctive boundary to the site which would limit development from encroaching upon the wider countryside to the west.</p>	<b>Moderate Contribution</b>

<b>Purpose 3: To assist in safeguarding the countryside from encroachment</b>		
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
What is the influence of the urbanising features?	The site relates physically and visually with Wombourne due to its location near the settlement edge. The development site is urbanised by intervisibility with residential development.	<b>Low Contribution</b>

**Table EDP 6.5:** Review of Contribution to Green Belt Purpose 4.

<b>Purpose 4: To preserve the setting and special character of historic towns</b>		
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
Is there potential for intervisibility with an historic core?	<p>The site does not lie within a historic town. There are no listed features in proximity of the site.</p> <p>Wombourne Conservation Area is approximately 890m to the south-east of the site and Staffordshire and Worcestershire Canal Conservation Area approximately 550m to the west, following the Canal's route.</p> <p>It is therefore considered that the development site has no relation to any historic cores.</p>	<b>No contribution</b>

- 6.4 While the wider Green Belt parcel is noted as having a significant contribution to the purposes of the Green Belt, the site itself has limited contribution to checking the unrestricted sprawl of Wombourne, as illustrated by the review above. This is due to its location near existing development and the lack of distinctive boundary features towards the area of residential development. Despite the site having a distinctive and well-vegetated boundary to the south and west, it is considered to have an overall moderate to low contribution to Purpose 1, due to its strong connection with existing development.
- 6.5 The site features a well-vegetated boundary to the west which creates a strong and distinctive buffer between the existing development and the wider countryside to the west. However, the main extent of the site, which lies to the east of this buffer feature, makes little contribution to this purpose. The visual connection to the existing areas of development results in the site having a low contribution to Purpose 2.
- 6.6 The well-established boundary vegetation along the western boundary is representative of the local landscape character and provides precedent for any treatment for the northern boundary. It is a key element of the site which creates a visual and perceptual buffer for the countryside and wider Green Belt parcel to the west. The site is influenced by, and more closely associated with, the adjacent residential development to the east. As a result, the site is considered to have a moderate contribution to Purpose 3.
- 6.7 The site is not within a historic town. Wombourne Conservation area is to the south of the site and the Staffordshire and Worcestershire Canal Conservation Area to the west. The trees along the South Staffordshire Railway Path may be discernible from listed features within the local area to the north and north-west and would potentially form the backdrop of views from the Canal Conservation Area. Beyond this, the site does not appear have

effect on the setting of historic features. As a result, the site is considered to have no contribution to Purpose 4 of the Green Belt designation.

- 6.8 The site appears to be consistent with the Green Belt Study in that “*there is no strong distinction between this relatively flat sub-parcel and the inset settlement edge of Wombourne*”. Areas of woodland and changes in topography to its north-east limit its visual relationship with the wider countryside. Overall, the site forms a small part of the southern extent of Green Belt Parcel S53C Scenario 1 and makes a limited contribution to the open character and purposes of the Green Belt. It is therefore considered to have low to moderate sensitivity to development and result in only **low to moderate harm** to the Green Belt.
- 6.9 This is in contrast to the findings of the Council’s Green Belt study, which considers the site to have a **moderate to high** level of harm if released from the Green Belt. The detailed assessment of the site contained herein has considered landscape and visual matters specific to the site and concludes that it is of a lower sensitivity than stated within the study.
- 6.10 Generally, development of the site is considered to result in a low to moderate harm to the Green Belt designation if released for development. While its release from the Green Belt designation would reduce the overall size of the Green Belt Parcel, it would have limited to no effect on the integrity of the gap between Wombourne and nearby settlements. **Plan EDP 2** illustrates the potential outline of the amended Green Belt boundary in relation to the site. This is due primarily to its perceived distance from nearby settlements, but also the character of the landscape which ensures intervisibility and perceptibility is limited. Furthermore, the allocated site 416 to its north-east would extend beyond the existing settlement. The site provides an opportunity to create a permanent, defensible boundary between the Green Belt and the settlement, including the allocated site to the north-east.

### **Green Belt Compensation (GBC)**

- 6.11 Green Belt Compensation (GBC) ensures that development proposals on former Green Belt land provide compensatory improvements to the quality and accessibility of the Green Belt. It becomes applicable, where it is necessary to release land from the designation for development and provides the opportunity to enhance land remaining within the Green Belt.
- 6.12 Should the site be put forward for development, GBC could be achieved in the form of:
- Enhanced biodiversity;
  - Increased areas of open access land; and
  - Upgraded public rights of way in the local vicinity.

## Section 7 Summary and Potential Development Response

### Summary

- 7.1 This report provides a landscape and Green Belt review of the site and evaluates how it contributes to the function of the Green Belt around Wombourne, South Staffordshire, whilst also considering its general sensitivity to development. It considers relevant planning policy, landscape and visual matters and the contribution the site makes to the purposes of the Green Belt as a distinct parcel of land.

### Landscape Summary

- 7.2 As discussed in **Section 5**, the site is visually contained by vegetation and development on three sides. It is open to the north and has some physical and visual connectivity with the wider countryside in this direction. However, the visual influence from the adjacent residential development has an urbanising effect on the site and detracts from its rural appearance. Land to the north-east of the site has been allocated for development (site 416) and would increase further the urbanising influence on the site.
- 7.3 Furthermore, whilst the site features some typical landscape characteristics for the area, there are no landscape features of note present within the site. While the site does provide a certain level of open character in contrast to the settlement edge, there are features present which limit the site's sensitivity. The site is considered to exhibit a low to medium sensitivity, as opposed to a moderate sensitivity as ascribed within the Council's Sensitivity Study. This is important given that in allocating sites the Council has taken account of the sensitivity ratings ascribed.
- 7.4 In landscape terms, the study area does not lie in or have any association with any designated area. The site presents an opportunity to create a new and permanent settlement edge with a defensible boundary to the wider countryside in the north.

### Green Belt Summary

- 7.5 As discussed in **Section 6**, the findings of the detailed Green Belt review undertaken demonstrate clearly that the site makes a limited contribution to the overall function of the Green Belt. Applying both the Local Authority's Green Belt Study's methodology and EDP's methodology specifically to the site, the site scores as considerably less important in terms of its contribution to Green Belt functions than is stated in the Green Belt study.
- 7.6 The site is influenced by the adjacent residential development to the east. The existing development has an urbanising effect and detracts from the site's open character. Its western boundary forms a distinctive feature within the landscape that could be enhanced to create a permanent boundary to the wider countryside. Additionally, a new vegetated boundary of similar character to the existing vegetation on the site's boundaries could be

introduced to the north of the site. This would have the potential to create a defensible boundary to the Green Belt and a permanent settlement boundary.

- 7.7 The site is essentially a parcel of land contained on three sides by existing boundary features and has minimal contribution in terms of maintaining the openness of the countryside to the north of Wombourne. Limited visibility of the site from the wider countryside suggests that development would have little to no effect on the visual amenity of the site beyond close-range views.

### **The Potential Development Response**

- 7.8 The below principles demonstrate how development on the site could introduce beneficial features to the local landscape and enhance local landscape character and provide appropriate boundary treatment to the settlement edge and the Green Belt. Opportunities include:

- Retain and enhance existing boundary features;
- Connect with allocated land to the north-east and create permanent boundary to the settlement edge;
- Create new vegetated boundary to the north of the site, using similar species to the existing boundary features and linking to the existing green infrastructure network;
- Retain and enhance the dense vegetation at the southern boundary;
- Provide links into local PRow network;
- Provide high quality Public Open Space within the site;
- Restrict potential for wide-ranging visual effects through retention and provision of boundary features and careful siting and height of development; and
- Reflect local housing density, whilst providing much needed housing.

### **Overall Summary**

- 7.9 This Landscape and Green Belt Review forms part of a wider suite of documents prepared by the applicant in support of the promotion of the site through the Local Plan process.
- 7.10 The site is not considered as sensitive as ascribed within the Council's Landscape Sensitivity Study. This study necessarily undertakes an assessment of much larger parcels than the site and has to therefore moderate and combine findings when identifying a singular sensitivity rating. This will inevitably 'underplay' or 'overplay' the sensitivity of certain potential development parcels. In this instance it is considered that the study

overplays the rating, applying a moderate sensitivity to what is shown through the detailed appraisal undertaken herein to be a low to medium sensitivity parcel of land.

- 7.11 Overall, the site is considered to make a limited contribution to the open character of the wider Green Belt parcel. The site comprises an area of 3ha, which makes up a small area of the whole parcel S53C-S1, which covers an area of 61.85ha. The site does not contribute to a “*strong distinction*” between the wider countryside and the settlement edge, as noted in the Green Belt study. Due to the presence of residential development on its eastern boundary, the site reads as part of the settlement edge. The site’s triangular shape and location between the South Staffordshire Railway Path to the west and residential development in the east reduce its contribution to the open character of the Green Belt.
- 7.12 Due to its small size in relation to the wider Green Belt Parcel, the site’s release from the Green Belt designation would have a very limited impact on the integrity of the Green Belt. The gap between Wombourne and nearby settlements to the north and north-east would remain intact.
- 7.13 There is potential to extend development into the site and form a permanent, new boundary to the settlement edge. Characteristic features, such as a line of trees linking the existing vegetation corridors with each other, could be implemented to form a new defensible boundary to the Green Belt. If considered acceptable for future development, the site offers opportunities to provide GBC measures which would have potential to enhance the quality and accessibility of the local Green Belt land.

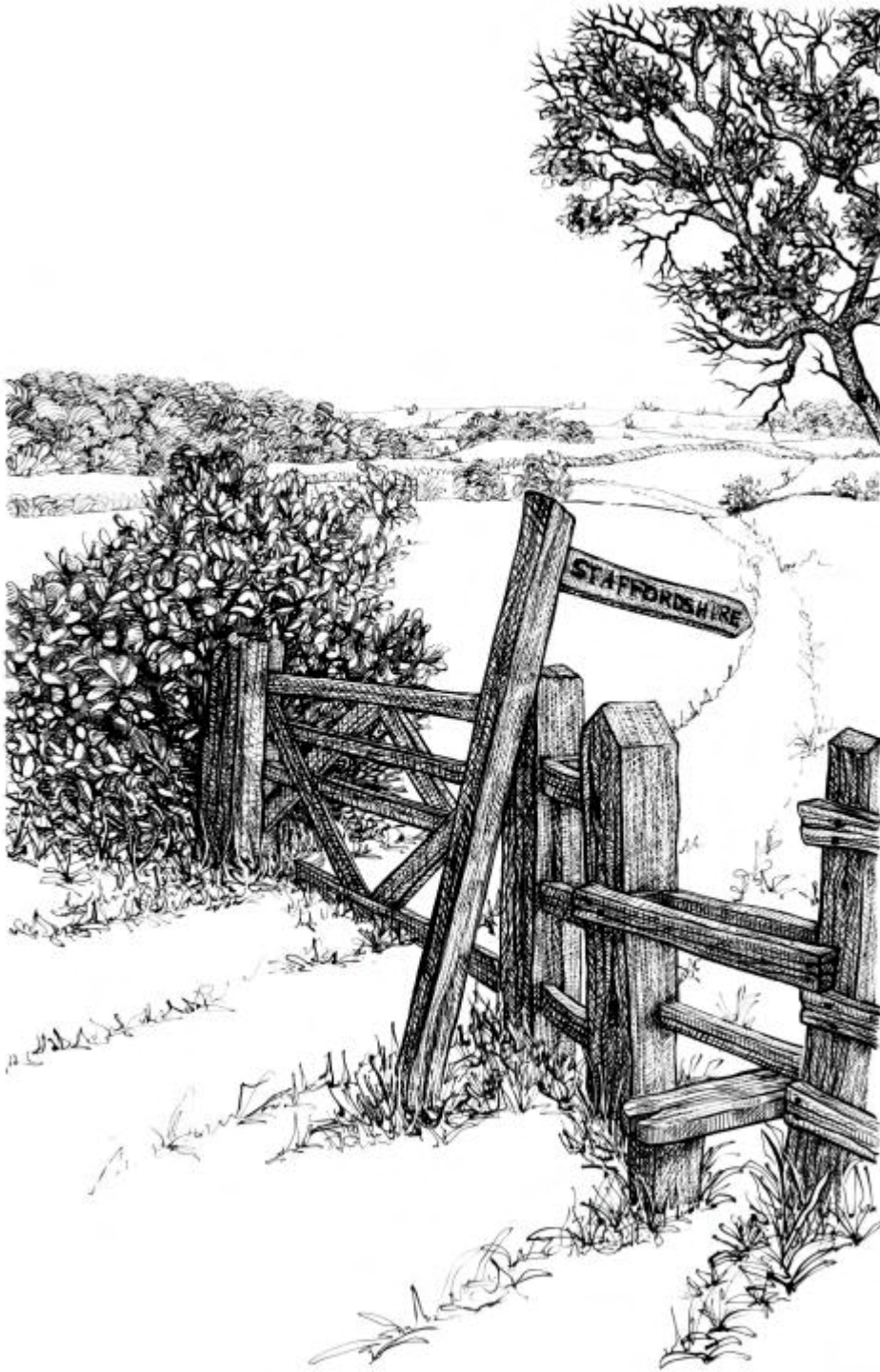
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## **Appendix EDP 1**

### **Findings of EDP Data Trawl**

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***Planning for Landscape Change:  
Supplementary Planning  
Guidance to the  
Staffordshire and Stoke on Trent  
Structure Plan 1996 – 2011  
Landscape Descriptions***



***Planning for Landscape Change:  
Supplementary Planning Guidance  
to the  
Staffordshire and Stoke on Trent  
Structure Plan, 1996 – 2011***

***Volume 3:  
Landscape Descriptions***

***Staffordshire County Council,  
Development Services Department, 2000***

## **Sandstone estatelands**

In its common form, elsewhere in the Structure Plan area, the woodlands and parklands of traditional rural estates characterise the more intact parts of this rolling lowland landscape type.

It has a wide geographic range in those parts of the county where Triassic sandstones are not obscured by drift deposits. Acid sands and brown earths predominate and, whilst some significant remnants of the original heathlands survive, the major land use is now arable cropping in large hedged or open fields of a regular pattern. Settlement is sparse, and characterised by expanded hamlets and wayside cottages. In the single area in the Staffordshire Plain which represents the basic landscape type the former woodlands and parklands have been almost completely lost.

### ***Visual character***

This is a gently rolling, featureless landscape where the increasing intensification of the arable farming has led to almost complete destruction of the fabric of the landscape, ensuring that all elements are on view. The degradation of this area is continuing, judging by the present state of the hedgerows and stag headed appearance of the remnant hedgerow oaks. Stream corridors in places provide the only intact landcover elements, giving some structure to this simple landscape.

The original vegetation pattern shows through strongly in the remnants of silver birch woodland and heathland species present in the hedgerows. Recent enclosure of the land is indicated by the ordered nature of a planned functional landscape.

Settlement is characterised by a sparsely settled pattern of expanded hamlets and isolated large farms and estate buildings linked by predominantly straight minor roads. Incongruous features such as modern large farm buildings and poorly designed reservoirs are being introduced into the landscape as a result of farm intensification.

### ***Characteristic landscape features***

Silver birch woodlands; well-treed stream corridors; straight roads; intensive arable agriculture in an open remnant field pattern.

### ***Incongruous landscape features***

Hedgerow removal along roadsides; field trees; badly designed farm reservoirs; large modern farm buildings and improved commuter properties; power lines.

### ***Factors critical to landscape character and quality***

The critical factors which currently limit landscape quality are the loss of characteristic landscape features, the poor condition of those features that remain, the relatively poor survival of historic elements that contribute to landscape character, such as field, settlement and road patterns, and the very poor survival of characteristic semi-natural vegetation (i.e. heathland and related habitats, and meres and mosses).

This landscape character type is very sensitive to the impacts of development and land use change.

### ***Potential value of new woodland planting***

Very high. There is a need in particular for the planting of larger woodlands, to restore the landscape structure of this open featureless arable farmland, to screen or direct views away from

inappropriate development, e.g. reservoirs and modern farm buildings, and to reinforce the remnant heathland character of the landscape.

**Potential value of other habitat provision and management**

The following Staffordshire Biodiversity Action Plan Targets are relevant at landscape scale:

Habitat type	Objective or target	Priority
Ancient/ semi-natural broadleaved woodland	maintain and enhance	high
	restore degraded sites	high
	recreate/ regenerate	medium
Ancient/ diverse hedgerows	maintain and manage	medium
	maintain trees	medium
Hedgerows	plant species-rich hedges	lower
Arable field margins	maintain, improve and restore	high
Canals, lakes and ponds	maintain and enhance water bodies and catchments	high
	increase the number of such features	high
Lowland wood pasture and parkland	maintain and safeguard	high
	restore degraded sites	high
Peat bogs	maintain and enhance	high
Reedbeds	maintain and create	high
Rivers and streams	maintain and improve the quality and quantity of water	high
	maintain the quality of all natural existing channel features	high

Further details of these habitat targets can be found in the Staffordshire Biodiversity Action Plan.

**Specific guidelines**

Tree and woodland planting

New planting should tie into existing woodlands or be of sufficiently large scale to be appropriate for the remnant field pattern. Existing tree-lined stream corridors and copses can be consolidated to increase their scale.

Conifers are acceptable in this landscape, but care must be taken with edge treatment. The shape of new woodlands is less important than is fitting them to the existing vegetation pattern, but there are some areas of stronger landform where care should be taken.

## **Sandstone estatelands: farmlands**

This is a variant of the basic landscape type in which traditional landed estates are uncommon. There is little woodland, and very little, if any, of ancient origin.

### ***Visual character***

This is a landscape of intensive arable farming, where hedgerow tree cover of oak and occasional ash is sparse and hedgerows are well trimmed and in decline. Many hedgerows have now been removed to increase field size and this has created an open, smoothly textured landscape with extensive views across it. A gently undulating landform results in the landcover elements being viewed as individual components of the landscape and field pattern showing up from elevated viewpoints.

Woodland cover in this medium to large-scale landscape tends to be small-scale broadleaved and conifer plantations. Visually, woodland edges, stream corridors and trees associated with farm buildings provide localised relief and control views.

### ***Characteristic landscape features***

Well treed stream valleys; small broadleaved copses; intensive arable farming; hedged field pattern; gently undulating landform.

### ***Incongruous landscape features***

Sand and gravel quarrying. Extensive fencing where field pattern is being lost. Improved commuter properties.

### ***Factors critical to landscape character and quality***

The critical factors which currently limit landscape quality are the loss of characteristic landscape features, the poor condition of those features that remain, and the relatively poor survival of characteristic semi-natural vegetation, in particular heathland and related habitats.

### ***Potential value of woodland planting.***

High. There is a particular need for the planting of larger woodlands, to restore a landcover structure to a landscape that has deteriorated due to intensive arable farming.



### **Potential value of other habitat provision and management**

The following Staffordshire Biodiversity Action Plan Targets are relevant at landscape scale:

<b>Habitat type</b>	<b>Objective or target</b>	<b>Priority</b>
Ancient/diverse hedgerows	maintain and manage	very high
	maintain trees	very high
Hedgerows	plant species-rich hedges	lower
Arable field margins	maintain, improve and restore	high
Canals, lakes and ponds	maintain and enhance water bodies and catchments	medium
	increase the number of such features	medium
Lowland wet grassland	maintain and enhance existing areas	medium
	restore degraded areas	medium
	create new areas	lower
Lowland wood pasture and parkland	maintain and safeguard	high
	restore degraded sites	high
Reedbeds	maintain and create	medium
Rivers and streams	maintain and improve the quality and quantity of water	high
	maintain the quality of all natural existing channel features	high
Unimproved neutral grassland	maintain and safeguard existing areas	high
	restore	medium
	link adjacent sites through habitat creation	medium
	create/re-create new areas	lower

Further details of these habitat targets can be found in the Staffordshire Biodiversity Action Plan.

### **Specific guidelines**

#### Tree and woodland planting

The existing field pattern needs reinforcing by additional hedgerow replanting with hedgerow trees. New woodlands should be designed to the existing remnant - although visually important - field pattern. The scale of planting can vary from small scale adjacent to existing vegetation to large scale planting of field size and above. A species mix of both conifers and broadleaves is acceptable provided care is taken with design of edges.

## **Appendix EDP 2**

### **EDP Green Belt Assessment Methodology and Criteria**

#### **Review Criteria**

A2.1 As noted in the NPPF the Green Belt serves five purposes. For each NPPF purpose, criteria have been determined that allow for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the function of the Green Belt in this location. The criteria for each purpose is described in more detail below.

#### ***Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas***

A2.2 This is a test that considers whether the site is able to prohibit sprawl. Commonly, sprawl is ribbon development but may also be piecemeal development in isolated areas or along settlement edges. A site may already have been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of openness, this being whether or not there is a sense that the site within the Green Belt is still open and absent of development.

A2.3 Sprawl may also be discouraged by defensible boundaries to existing settlements that are either natural (e.g. topography, woodland or water course) or man-made features (e.g. as a main road, main railway line, or settlement edge). These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries may contribute towards greater openness.

#### ***Purpose 2: To Prevent Neighbouring Towns Merging into One Another***

A2.4 The consideration is whether or not the settlement growth could lead to merging with another town. The wording of the NPPF refers to 'towns', but often the Green Belt affects a considerably smaller geographical scale, in which it is more relevant to consider the potential for merging of neighbouring settlement edges to distinct settlement areas that might be defined as towns.

A2.5 In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in either plan view or 'on the ground' by intervening natural or man-made features.

A2.6 The interpretation of 'merging', in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements, the range can be much smaller with distances reducing to as little as 100m in some cases. It is of note that susceptibility to 'merging' depends on distance between two settlements, and each situation needs to be reviewed in relation to the local landscape and visual context.

***Purpose 3: To Assist in Safeguarding the Countryside from Encroachment***

- A2.7 In terms of Green Belt, the 'countryside' is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space and access to it, etc. Countryside is likely to be undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain man-made features such as historic landmarks, properties, mineral extraction or larger areas of settlement.
- A2.8 This assessment is based on the key landscape characteristics of the site and its surroundings, as well as the visual context as described above in **Section 2**. Consideration is also given to the extent of recreational access provided to the Green Belt through the site.
- A2.9 Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative 'value' element to be applied to landscapes.
- A2.10 The matter of 'encroachment' is also a judgement that considers whether or not development (such as built form along the edge or within it, pylons and high voltage overhead cables, sub-stations, quarrying and urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or influences it, and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site that has limited or no urbanising influences has a stronger role in safeguarding countryside.
- A2.11 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, it is large man-made features such as dual carriageways, or motorways; natural features might include woodland, large water bodies, such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.
- A2.12 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded where possible or integrated sensitively into design proposals.

***Purpose 4: To Preserve the Setting and Special Character of Historic Towns***

A2.13 The subject of setting and special character in the context of historic towns should be examined on a site by site basis, by specialist heritage consultants. However, the Archaeology and Heritage Assessment allows the assessment to acknowledge that historic cores do exist as indicated by the Royal Tunbridge Wells and Pembury Conservation Areas.

***Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land***

A2.14 This purpose falls outside the scope of this report and has not been tested.

**Review Scoring**

A2.15 EDP has developed a methodology for Green Belt Reviews, which is based on landscape and visual assessment methodology with regard to the purposes of the Green Belt and our experience of Green Belt reviews.

A2.16 The site is scored against the criteria for each purpose as shown below, with criteria weighted as no, low, moderate or strong contribution towards meeting the purposes of the Green Belt. Occasionally, scores are spread if part of the site makes differing performances. This ensures that, whilst the NPPF does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the Green Belt or retained within it.

<b>NPPF Green Belt Purpose</b>	<b>Criteria</b>	<b>Application of Criteria to Site and Criteria Weighting:</b>  <b>No Contribution;</b>  <ul style="list-style-type: none"> <li>• <b>Low Contribution;</b></li> <li>• <b>Medium Contribution; and</b></li> <li>• <b>Strong Contribution.</b></li> </ul>
<b>Purpose 1 To check the unrestricted sprawl of large built-up areas</b>	<ul style="list-style-type: none"> <li>• Creates a clear, recognisable distinction between urban fringe and open countryside.</li> </ul>	<p>Does the site form an open buffer between the existing settlement edge and the wider countryside?</p> <ul style="list-style-type: none"> <li>a. Yes, the site is free of development and associated influences and strongly contributes to the openness of the Green Belt (Strong);</li> <li>b. There is an absence of development within the site, but it is overlooked by adjacent/nearby development (Moderate);</li> <li>c. No, the site contains development and/or does not clearly define a distinction between the settlement edge and the open countryside (Low); and</li> <li>d. Land use of the site results in it forming neither countryside or urban (no contribution).</li> </ul>
	<ul style="list-style-type: none"> <li>• Defensible boundaries have a role in limiting unrestricted sprawl as they create the boundaries to Green Belt parcels. These may be within the site or form part of its boundary; and</li> <li>• Such boundaries can be permanent, such as roads, steep topography, woodland or require additional reinforcement such as hedgerows, tree belts, streams. Fences do not form defensible boundaries. Incomplete or low boundaries may result in part/all of a site making a greater contribution to the openness of the Green Belt.</li> </ul>	<p>Does the site have a defensible boundary which can prevent sprawl?</p> <ul style="list-style-type: none"> <li>a. The site does not have defensible boundaries and maintains openness with the wider Green Belt (strong);</li> <li>b. The site has some defensible boundary/boundaries and maintains openness in some directions. Additional reinforcement needed (Moderate);</li> <li>c. The site has some permanent boundaries such as roads/railways/rivers/high ground and partially defensible boundaries, some of which do not require additional reinforcement (Low); and</li> <li>d. The site has permanent defensible boundaries that would immediately prevent sprawl (no contribution).</li> </ul>

<b>NPPF Green Belt Purpose</b>	<b>Criteria</b>	<b>Application of Criteria to Site and Criteria Weighting:</b>  <b>No Contribution;</b>  <ul style="list-style-type: none"> <li>• <b>Low Contribution;</b></li> <li>• <b>Medium Contribution; and</b></li> <li>• <b>Strong Contribution.</b></li> </ul>
<b>Purpose 2 To prevent neighbouring towns merging into one another</b>	<ul style="list-style-type: none"> <li>• Settlements maintain a recognisable edge; and</li> <li>• The extent to which the site forms a logical fit with the settlement or, is perceived as an extension that could erode openness.</li> </ul>	<p>Is the site well associated with the existing settlement edge?</p> <ul style="list-style-type: none"> <li>a. The site forms the gap between two settlement edges (strong);</li> <li>b. The site abuts two settlement boundaries and therefore forms part of an indent (moderate);</li> <li>c. The site abuts one settlement boundary but is not divorced from it (low); and</li> <li>d. The site is clearly separated from the settlement boundary and would not undermine the sense of openness (no contribution).</li> </ul>
	<ul style="list-style-type: none"> <li>• Prevent loss or noticeable reduction in distance between towns/settlement edges; this may also be affected by agricultural land use or topography. A larger distance or more prominent topographical change would be better capable of accommodating change than a narrow gap; and</li> <li>• The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent merging.</li> </ul>	<p>Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility on potential for coalescence?</p> <ul style="list-style-type: none"> <li>a. Immediate and clear intervisibility with next nearest settlement edge (strong);</li> <li>b. Partial intervisibility with next nearest settlement edges (moderate);</li> <li>c. Limited intervisibility with next nearest settlement edges (low); and</li> <li>d. No intervisibility with next nearest settlement edges (no contribution).</li> </ul>

<b>NPPF Green Belt Purpose</b>	<b>Criteria</b>	<b>Application of Criteria to Site and Criteria Weighting:</b>  <b>No Contribution;</b>  <ul style="list-style-type: none"> <li>• <b>Low Contribution;</b></li> <li>• <b>Medium Contribution; and</b></li> <li>• <b>Strong Contribution.</b></li> </ul>
<b>Purpose 3 To assist in safeguarding the countryside from encroachment</b>	<ul style="list-style-type: none"> <li>• The countryside comprises 'key characteristics' which define the landscape and the way it is perceived, both visually and physically.</li> </ul>	<p>To what extent does the site represent the key characteristics of the countryside?</p> <ul style="list-style-type: none"> <li>a. The site is highly representative of host landscape character area/type; does not contain landscape detractors (strong);</li> <li>b. The site is partially representative of host landscape character area/type; there are some landscape detractors (moderate);</li> <li>c. The site has a low representation of characteristics; many landscape detractors (low); and</li> <li>d. No representation of landscape character area/type; high number detractors that weaken landscape character considerably (no contribution).</li> </ul>
	<ul style="list-style-type: none"> <li>• Encroachment: features such as settlement edge, speed signage and street lighting affect the extent to which the countryside changes from rural to urban.</li> </ul>	<p>To what extent is the site urbanised, either by on-site or off-site features?</p> <ul style="list-style-type: none"> <li>a. There are no urbanising features within the site or directly influencing it (strong);</li> <li>b. There are several off-site urbanising features affecting the site (moderate);</li> <li>c. There are many off-site urbanising features affecting the site (low); and</li> <li>d. The site is distinct due to its urbanising features (no contribution).</li> </ul>



<b>NPPF Green Belt Purpose</b>	<b>Criteria</b>	<b>Application of Criteria to Site and Criteria Weighting:</b>  <b>No Contribution;</b>  <ul style="list-style-type: none"> <li>• <b>Low Contribution;</b></li> <li>• <b>Medium Contribution; and</b></li> <li>• <b>Strong Contribution.</b></li> </ul>
<b>Purpose 4 To preserve the setting and special character of historic towns</b>	<ul style="list-style-type: none"> <li>• The proximity of the site to a heritage designation relates to the historic character of a settlement and whether or not its openness in Green Belt terms is a consideration.</li> </ul>	<p>What is the spatial and visual relationship between the site and the historic core of the nearest towns?</p> <ul style="list-style-type: none"> <li>a. The site is wholly within an historic character area/heritage-related designation (strong);</li> <li>b. The site is adjacent to an historic character area/heritage-related designation (moderate);</li> <li>c. The site has partial intervisibility with an historic character area/heritage-related designation its openness may be a consideration (low); and</li> <li>d. The site does not share a boundary with an historic character area/heritage-related designation and/or there is no intervisibility (no contribution).</li> </ul>
<b>Purpose 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</b>	<p>Not tested.</p>	<p>Not tested.</p>

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## **Appendix EDP 3**

### **Green Belt Study Assessment Methodology and Criteria**

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# South Staffordshire Green Belt Study

Stage 1 and 2 Report  
Prepared by LUC  
July 2019

**Project Title:** Green Belt Study – Stage 1 and Stage 2 Report

**Client:** South Staffordshire Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.0	18/03/2019	Draft Stage 1 and 2 Report	Richard Swann Helen Kent Natalie Collins	Helen Kent	Sarah Young
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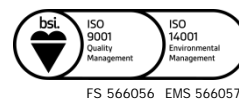
## South Staffordshire Green Belt Study

Stage 1 and 2 Report  
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# Part B: Stage 1 Methodology and Findings



## 4 Stage 1 Methodology

### Introduction

- 4.1 The following chapter sets out the methodology for the Stage 1 Green Belt Assessment. The primary aim of the Stage 1 assessment was to establish the variation in the contribution of land to achieving the Green Belt purposes as defined by the NPPF. Based on the assessment criteria outlined below, a strategic review of the contribution of all Green Belt land within the Council areas to each of the five Green Belt purposes was undertaken. This drew out spatial variations in the contribution of Green Belt land to each Green Belt purpose.

### Strategic Assessment Process

- 4.2 Prior to any detailed assessment work, an initial visit was made to the area, to gain an overview of the spatial relationships between the settlements and the countryside in South Staffordshire.
- 4.3 The first main step then involved identifying any Green Belt locations where sufficient urbanising development has occurred which has had a significant impact on Green Belt openness (as defined in **Chapter 3** above). Distinctions were made between development which is rural enough in character, or small enough in size, or low enough in density, not to affect to its designation as Green Belt.
- 4.4 The second step assessed the fragility of gaps between the settlements identified in **Chapter 3** as 'towns' under Green Belt Purpose 2.
- 4.5 The assessment then proceeded on a settlement by settlement basis, starting with the largest areas of development – i.e. in the first instance the Wolverhampton-Walsall conurbation – through to the smaller inset<sup>43</sup> villages. If any significant areas of washed-over<sup>44</sup> urbanising development were identified in the initial stage, these too formed a focus for analysis. Recognising the common factors that influence the role of Green Belt land in the relationship between urban settlement and countryside (as described in **Paragraph 4.3** above), the analysis:
- assessed the strength of relationship between the Green Belt and the urban area, considering the extent and form of development, land use characteristics and separating and connecting features;
  - identified changes in the strength of relationship between settlement and countryside, again considering the extent and form of development, land use characteristics and separating and connecting features; and
  - considered how these spatial relationships affect contribution to each of the Green Belt purposes, and mapped lines to mark these changes.
- 4.6 The analysis progressed outwards from each settlement until it was determined that land:
- ceases to play a significant role in preventing sprawl of a large built-up area;
  - either makes a consistent contribution to settlement separation, or makes no contribution to this purpose;
  - is strongly distinct from urban settlement and has a strong relationship with the wider countryside; and
  - makes no contribution to the setting or special character of a historic town.

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<sup>43</sup> 'Inset' development is development that is surrounded by Green Belt land but is not itself located within the Green Belt designation.

<sup>44</sup> Development 'washed-over' by the Green Belt is development that is located within the Green Belt designation.

## Criteria for Assessment of Green Belt Contribution

- 4.7 To draw out clear variations in contribution to each Green Belt purpose the three point scale set out in **Table 4.1** was used.

**Table 4.1: Green Belt Contribution Ratings**

<b>Strong Contribution</b>	Green Belt performs well against the purpose.
<b>Moderate Contribution</b>	Green Belt performs moderately well against the purpose.
<b>Weak/No Contribution</b>	Green Belt makes weak or no contribution to the purpose.

### Purpose 1 Assessment Criteria

- 4.8 The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred and its relationship with existing large built-up area(s). **Figure 3.1** indicates which settlements lie within large built-up areas. All of the development forms noted in the RTP1 note (see **para 3.17**) have been considered when judging the extent to which sprawl has already occurred. Assumptions about the extent and form of future development which have not been permitted cannot be made. Sprawl includes any built structure that has an impact on openness and/or has an urbanising influence. It does not include development which is classed as appropriate development, or not inappropriate development in the Green Belt (as defined in paras 143-147 of the NPPF<sup>45</sup>).
- 4.9 To contribute to Purpose 1, land must lie adjacent to, or in close proximity to, a large built-up area, and must retain a degree of openness that distinguishes it from the urban area. Land that has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development or the strength of physical separation from the wider countryside, makes a weaker contribution to this purpose. Vice versa, land which is adjacent to the urban edge but which, as a result of its openness and relationship with countryside, is distinct from it makes a stronger contribution.
- 4.10 Land which is more clearly associated with a settlement that is not a large built-up area can be considered to make no direct contribution to Purpose 1.
- 4.11 In summary, key questions asked in assessing Purpose 1, the prevention of sprawl of large, built-up areas, include:
- Does the land lie in, adjacent to, or in close proximity to the large built-up area?
  - To what extent is the land open or does it contain existing urban development?
  - Does the land relate sufficiently to a large built-up area for development within it to be associated with that settlement or vice versa?
  - Does land have a strong enough relationship with the large built-up area, and a weak enough relationship with other Green Belt land, for development to be regarded more as infill than sprawl?
  - What is the degree of containment by existing built development or other features (e.g. by landform)?

<sup>45</sup> This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404. Applying the findings of this case, appropriate development in the Green Belt cannot be contrary to either the first or third Green Belt purpose and should be excluded from the assessments as 'urbanising features' as it is cannot be "urban sprawl" and cannot have an "urbanising influence".

4.12 **Table 4.2** summarises the criteria that were used for the assessment of Purpose 1.

**Table 4.2: Purpose 1 assessment criteria**

<b>Purpose 1: Check the unrestricted sprawl of large built-up areas</b>	
<p>Development/land-use: where there is less existing development, the Green Belt makes a stronger contribution.</p> <p>Location: land closer to the large, built-up area generally makes a stronger contribution.</p> <p>Separating features: land that has a stronger relationship with the countryside than the large built-up area makes a stronger contribution.</p> <p>Connecting features: where there are no connecting features between the large built-up area and the countryside, land makes a stronger contribution.</p>	
<b>Strong Contribution</b>	Land adjacent or close to the large built-up area that contains no or very limited urban development and has strong openness. It retains a relatively strong relationship with the wider countryside.
<b>Moderate Contribution</b>	Land adjacent or close to the large built-up area that contains some urban development and/or is to an extent contained by urban development, but retains openness and some relationship with the wider countryside.
<b>Weak/No Contribution</b>	<p>Land adjacent or close to the large built-up area that is already fully urbanised; or</p> <p>land that is too contained by development to have any relationship with the wider countryside; or</p> <p>land that is sufficiently separated or distant from a large built-up area for there to be no significant potential for urban sprawl from the large built-up area.</p>

**Purpose 2 assessment criteria**

- 4.13 The role land plays in preventing the merging of towns is more than a product of the size of the gap between towns. The assessment considered both the physical and visual role that Green Belt land plays in preventing the merging of settlements. This approach accords with PAS guidance which states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. Settlements identified as towns are listed in **Table 3.1** and indicated on **Figure 3.2**.
- 4.14 Land that is juxtaposed between towns makes a contribution to this purpose, and the stronger the relationship between the towns – the more fragile the gap – the stronger the contribution of any intervening open land. Physical proximity was the initial consideration, but land that lacks a strong sense of openness, due to the extent of existing development that has occurred, makes a weaker contribution. This includes land that has a stronger relationship with an urban area than with countryside, due to extent of containment by development, dominance of development within an adjacent inset area, or containment by physical landscape elements. However, where settlements are very close, a judgement was made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns, i.e. the characteristics of the open land relate more to the urban areas themselves than to the open land in between. Where this is the case, the contribution to Purpose 2 may be reduced.
- 4.15 Both built and natural landscape elements can act to either decrease or increase perceived separation, for example intervisibility, a direct connecting road or rail link or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation. Smaller inset settlements also reduce the amount of countryside between towns, particularly as perceived from connecting roads.



- 4.16 In summary, key questions asked in assessing Purpose 2, preventing the coalescence of towns, include:
- Does the land lie directly between two settlements being considered under Purpose 2?
  - How far apart are the towns being considered?
  - Is there strong intervisibility between the towns?
  - How do the gaps between smaller settlements affect the perceived gaps between towns?
  - Are there any separating features between the towns including e.g. hills, woodland blocks etc. which increase the sense of separation between the settlements?
  - Are there any connecting features between the towns including e.g. roads, railways which reduce the sense of separation between the settlements?
  - What is the overall fragility/ robustness of the gap taking the above into account?

4.17 **Table 4.3** summarises the criteria that were used for the assessment of Purpose 2 in the study.

**Table 4.3: Purpose 2 assessment criteria**

<b>Purpose 2: Prevent neighbouring towns from merging</b>	
<p>Development/land-use: less developed land will make a stronger contribution – a ‘gap’ which contains a significant amount of development is likely to be weaker than one in which the distinction between settlement and countryside is clearer.</p> <p>Location: land juxtaposed between towns makes a stronger contribution.</p> <p>Size: where the gap between settlements is wide, the Green Belt makes a weaker contribution.</p> <p>Separating features: the presence of physical features that separate towns such as substantial watercourses, landform e.g. hills, or forested areas, can compensate for a narrower gap (in terms of distance). However loss of such features would consequently have a greater adverse impact on settlement separation.</p> <p>Connecting features: where physical features strengthen the relationship between towns, e.g. where they are directly linked by a major road or have a strong visual connection, or where smaller urban settlements lie in between, the gap can be considered more fragile, and the Green Belt consequently makes a greater contribution to maintaining separation.</p>	
<b>Strong Contribution</b>	Land that forms a narrow gap between towns, essential to maintaining a sense of separation between them.
<b>Moderate Contribution</b>	<p>Land that lies between towns which are near each other, but where there is sufficient physical or visual separation for each town to retain its own distinct setting; or</p> <p>land that retains separation between parts of two towns, but where development elsewhere has significantly compromised the sense of distinction between the two settlements.</p>
<b>Weak/No Contribution</b>	<p>Land which is not located within a gap between towns; or</p> <p>land which plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns; or</p> <p>land which plays no significant role due to the extent of development; or</p> <p>land forming a gap that is too narrow to create any clear distinction between towns (i.e. a sense of leaving one and arriving in another).</p>

### Purpose 3 assessment criteria

- 4.18 The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of:
- i) the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising uses; and
  - ii) the extent to which land physically relates to the adjacent settlement and to the wider countryside (i.e. whether it has a stronger relationship to urban area than with the wider countryside).
- 4.19 Physical landscape elements (or a lack of them), may strengthen or weaken the relationship between settlement and adjacent countryside, but there needs to be significant urban influence from adjacent land, and a degree of physical containment to limit contribution to this purpose. Intervisibility between open land and an urban area is not in itself enough to constitute a significant urban influence: the urban area would need to be a dominating influence either through: i) the scale of development; or ii) the degree of containment of the open land by development. Also the presence of landscape elements (e.g. landform or woodland) that strongly contain an area, and consequently separate it from the wider countryside, may give land a strong relationship with a visible urban area even if buildings are not particularly dominant.
- 4.20 It is important to maintain a distinction between contribution to Purpose 3 and contribution to landscape/visual character. For example, land that displays a strong landscape character in terms of sense of tranquillity, good management practices or high scenic value, or which has public recreational value, may have high sensitivity from a landscape/visual point of view. However the same land in Green Belt terms may well make as equal a contribution to Purpose 3 as land at the urban edge which retains its openness and a relationship with the wider countryside.
- 4.21 In summary, key questions asked in assessing Purpose 3: safeguarding the countryside from encroachment include:
- To what extent does the land exhibit the characteristics of the countryside – i.e. an absence of built or otherwise urbanising development?
  - Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?
  - Does land relate more strongly to the settlement(s), or to the wider countryside?
- 4.22 **Table 4.4** summarises the criteria that were used for the assessment of Purpose 3 in the study.

**Table 4.4: Purpose 3 assessment criteria**

Purpose 3: Assist in safeguarding the countryside from encroachment	
Development/land-use: where there is less urbanising land use and more openness, land makes a stronger contribution.	
Separating features: land that has a stronger relationship with countryside than with the settlement makes a stronger contribution.	
Connecting features: an absence of physical features to link settlement and countryside means that land makes a stronger contribution.	
<b>Strong Contribution</b>	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms <sup>46</sup> ) and which does not have a stronger relationship with the urban area than with the wider countryside.

<sup>46</sup> This does not include development which is deemed to be appropriate, or not inappropriate within the Green Belt as set out in Paragraphs 145 and 146 of the NPPF.

<b>Moderate Contribution</b>	<p>Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms), and which has a stronger relationship with the urban area than with the wider countryside (i.e. it is contained in some way by urbanising and or other features); or</p> <p>Land which retains some degree of openness and has some relationship with the wider countryside but which is compromised by urbanising development or uses within it.</p>
<b>Weak/No Contribution</b>	<p>Land that contains urbanising development of a scale, density or form that significantly compromises openness; or</p> <p>Land which is too influenced and contained by urban development to retain any significant relationship with the wider countryside.</p>

#### Purpose 4 assessment criteria

- 4.23 The connection between a historic town's historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement. It should also be noted that the connection is not always visual, for example where the wider open countryside surrounding a historic town contributes to its setting and special character collectively as a whole.
- 4.24 In summary, key questions asked in assessing Purpose 4 include:
- What is the relationship of the land with the historic town?
  - Does the land form part of the setting and/or special character of an historic town?
  - What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?
- 4.25 Consideration of the setting of individual heritage assets extends only to their contribution to the character and legibility of the historic towns.
- 4.26 **Table 4.5** summarises the criteria that were used for the assessment of Purpose 4 in the study.

**Table 4.5: Purpose 4 assessment criteria**

Purpose 4: Preserve the setting and special character of historic towns	
Development/land-use: less developed land makes a stronger contribution.	
Location: an area that contains key characteristics, or important in views to or from them, makes a stronger contribution.	
Separating features: land that lacks physical features to create separation from a historic town – i.e. land where the Green Belt provides a visual setting for the historic town – makes a stronger contribution.	
Connecting features: where there is stronger relationship between historic town and countryside the contribution to this purpose is stronger.	
<b>Strong Contribution</b>	The land and its openness makes a key contribution to the characteristics identified as contributing to a historic town's setting or special character.
<b>Moderate Contribution</b>	The land and its openness makes some contribution to the characteristics identified as contributing to a historic town's setting or special character.
<b>Weak/No Contribution</b>	Land forms little or no part of the setting of an historic town and does not contribute to its special character.

### Purpose 5 assessment criteria

- 4.28 As set out in **Chapter 3** above, it was not considered possible to reasonably differentiate between the contribution of different parts of the Green Belt to Purpose 5. Given the historic and continued strategy to recycle brownfield land in the adjoining Black Country authorities, as set out in the Black Country Core Strategy and targeted through identified regeneration areas, the significant area of brownfield land within the Black Country, the presence of brownfield land within South Staffordshire, and the location of South Staffordshire and the Black Country authorities within the same Housing Market Area, it is concluded that all Green Belt land within South Staffordshire makes a strong contribution to urban regeneration by encouraging the recycling of derelict and other urban land.

## Stage 1 Strategic Assessment Outputs

### Analysis of variations in contribution to Green Belt purposes

- 4.29 The Stage 1 outputs are discussed in **Chapter 5**. Maps illustrating the assessed variations in contribution for each purpose across South Staffordshire are also set out in **Chapter 5**. Each map is accompanied by supporting text describing the pattern of variation and the reasoning behind its definition.
- 4.30 By combining the lines marking variations in contribution to Green Belt purposes, a list of land parcels was generated, each of which has a reference number and a rating for contribution to each purpose. The parcels are the product of the assessment rather than a precursor to it. The reasoning behind this approach was to draw out variations in contribution to inform the site-specific assessments undertaken at Stage 2, avoiding broad variations in contribution within prematurely and more arbitrarily defined parcels. Avoiding significant variations in contribution within defined parcels prevents the need for ratings to be generalised to reflect the strongest or average level of contribution within a defined area.



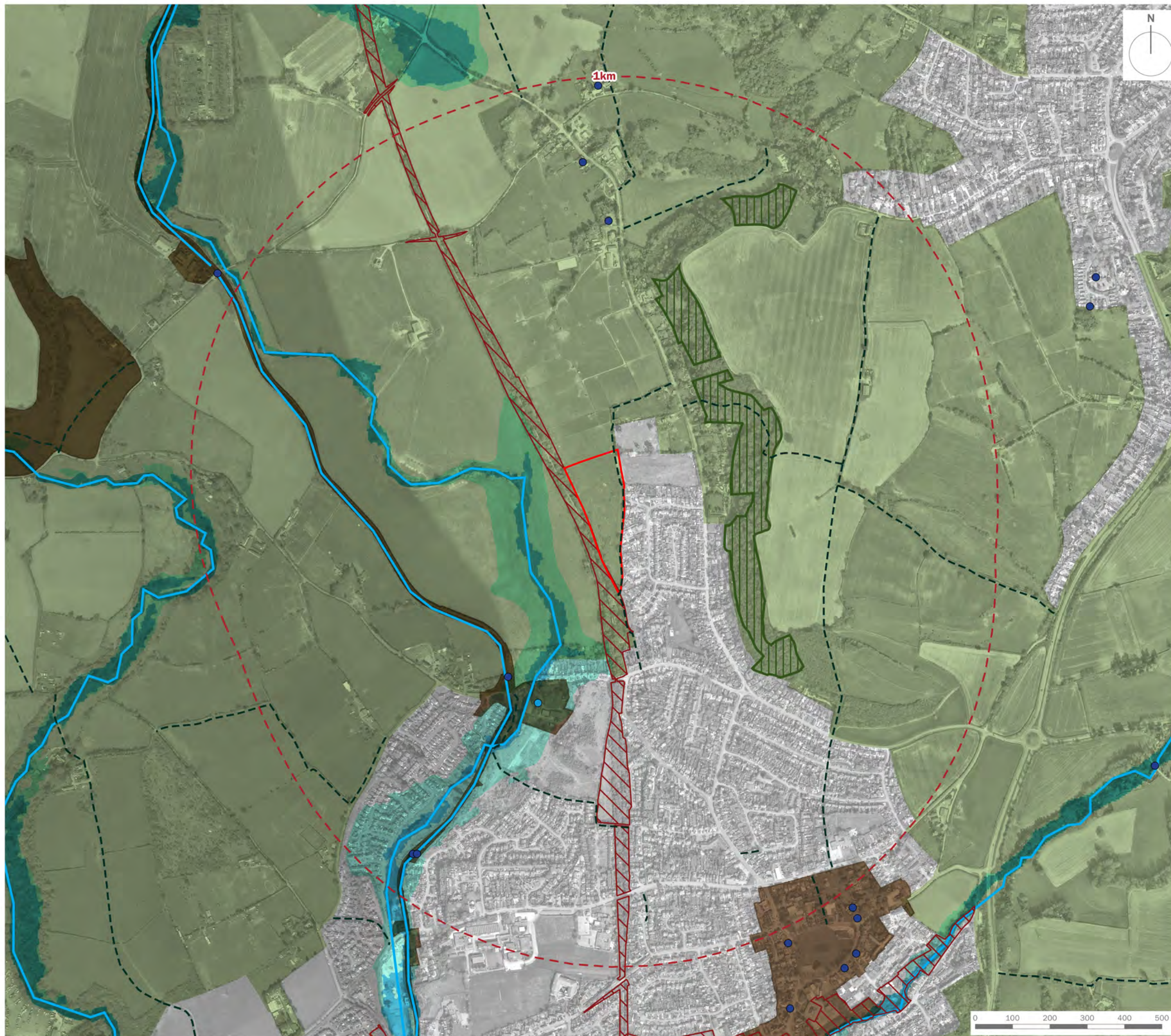
## **Plans**

**Plan EDP 1**      Site Context and Designations  
(edp7419\_d001b 10 December 2021 JTF/LTi)

**Plan EDP 2**      Green Belt Context  
(edp7419\_d002 10 December 2021 JTF/LTi)

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- Site Boundary
  - 1km Detailed Study Area
  - Green Belt
  - Public Rights of Way (PRoW)
  - Water Courses
  - Local Nature Reserves
  - Conservation Areas
- Listed Buildings
- Grade II\*
  - Grade II
- Ancient Woodland
  - Flood Zone 2 (Environment Agency)
  - Flood Zone 3 (Environment Agency)

client  
**Bellway Homes Ltd**





project title  
**Land at Wombourne**

drawing title  
**Plan EDP 1: Site Context and Designations**

date	10 DECEMBER 2021	drawn by	JTF
drawing number	edp7419_d001b	checked	LTI
scale	1:10,000 @ A3	QA	RB





-  Potential Green Belt Boundary
-  Existing Green Belt Boundary
-  Allocation 416
-  Site 708 (as defined in the South Staffordshire Council SHELAA)

client	<b>Bellway Homes Ltd</b>		
project title	<b>Land at Wombourne</b>		
drawing title	<b>Plan EDP 2: Green Belt Context</b>		
date	<b>10 DECEMBER 2021</b>	drawn by	<b>SW</b>
drawing number	<b>edp7419_d002</b>	checked	<b>LTI</b>
scale	<b>1:5,000 @ A3</b>	QA	<b>GY</b>





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**Appendix 2: Land off Orton Lane, Wombourne –  
Site Location Plan**



**Do not scale from this drawing.**  
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## PLANNING

— Site boundary (1.76ha)

Rev.	Date	Description
------	------	-------------

Land to the west of Orton Lane, WOMBOURNE

### Location Plan

Job ref: 540	Drawing number: L01	Revision: -
Scale: 1:1,250 @ A3	Date: November 2023	



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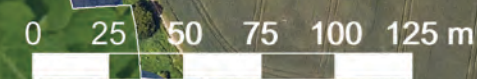
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**Appendix 3: Land west of Strathmore Crescent,  
Wombourne – Site Location Plan**





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### PRELIMINARY

- Site boundary
- - - Existing Public Right of Way
- - - S Staffordshire Railway Walk (Mondarch's Way)
- Safeguarded land (SAD3)

#### OPPORTUNITIES

- ← Proposed access point
- ↔ Potential future connections
- ↔ Visual and landscape connectivity

Rev.	Date	Description
Land to the west of Orton Lane WOMBOURNE		
Potential Phase 2 - Location Plan		
Job ref: 278	Drawing number: SK03	Revision: -
Scale: 1:2,500 @ A3	Date: October 2020	



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## **Appendix 4: Counsel Advice Note**

**IN THE MATTER OF THE  
SOUTH STAFFORDSHIRE COUNCIL LOCAL PLAN REVIEW**

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**ADVICE**

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**I. INTRODUCTION**

1. I am instructed by Turley on behalf of Bellway Homes Limited ('Bellway') in relation to the present approach taken by South Staffordshire Council ('the Council') as regards its Local Plan Review. Through the course of the development of the emerging South Staffordshire Local Plan ('SSLP') Turley have promoted, on behalf of Bellway, four sites for residential development and inclusion within the SSLP.
2. Those sites are (i) land west of Hyde Lane, Kinver, (ii) land east of Dunsley Drive, Kinver, (iii) land east of Orton Lane, Wombourne and (iv) land west of Strathmore Crescent, Wombourne. Sites (i), (ii) and (iv) lie within the Green Belt. Site (iii) was 'safeguarded' in the extant development plan.
3. The Council published the SSLP in November 2022 with the required consultation period running from 11<sup>th</sup> November 2022 to 23<sup>rd</sup> December 2022 (per Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ('the Regulations')).
4. The published SSLP explained that "*Unmet housing need across the GBBCHMA is a key cross boundary issue to be addressed with neighbouring authorities...*" (§3,7, pg 11) and

that *“A key part of the new Local Plan is to establish the role that South Staffordshire Council can play in meeting both its own housing needs and those of the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA) which contains local authorities with significant unmet housing needs”* (§5.8, pg 27).

5. The published SSLP identified the housing need for the district to be 241 dwellings per annum over the plan period 2022-2039 (§5.9, pg 27). The published plan then continues by explaining the role that the Council has played as part of the GBBCHMA including the joint preparation of the GBBCHMA Strategic Growth Study in 2018.
6. There then follows discussion of the likely quantum of unmet need within the GBBCHMA and that *“Using this evidence, it was proposed to test an additional contribution of 4,000 dwellings to the unmet housing needs of the GBBCHMA in the Council’s local plan review...”* (§5.12, pg 27).
7. This careful explanation confirms that the Council recognised the requirement within the GBBCHMA to accommodate the unmet housing needs of other authorities and the assessment of South Staffordshire’s ability to accommodate some of that need was considered throughout the preparation of the SSLP: *“It also ensured that the issue of unmet housing needs was considered from the earliest stage possible in the plan’s preparation and to provide Duty to Cooperate partners with the chance to comment on the approach from the earliest stage of the plan-making process”* (§5.12, pg 28).
8. The Duty to Co-operate Topic Paper (2021) explained the positive approach that the Council had taken to date in the preparation and evolution of the SSLP: *“To date the Council has used the GBHMA Strategic Growth Study recommendations as the basis for its contributions to unmet GBHMA housing needs, seeking to ensure the emerging housing target is proportionate to the findings of that study...”* (§5.5, pg 6). The Council were content that this approach was not only endorsed but supported by the other GBBCHMA authorities *“To date there has been broad support for South Staffordshire’s housing targets from many local authorities across the GBHMA”*.
9. An updated DtC Topic Paper was published in advance of the Regulation 19 consultation in November 2022. It states that *“At each stage of the Local Plan Review’s preparation, the Council has sought to be informed by the most up-to-date Duty to Co-operate position*

*available at that point in time, having regard to the most recent joint evidence and correspondence available at those points in time.” (§4.6, pg 5).*

10. The published SSLP confirmed the Council’s view that *“Given the evidence to date, it is still clear that a significant housing shortfall is likely to remain across the GBBCHMA... and the Council will continue to play a proactive part in cross-boundary agreements to address the housing shortfalls”* (§5.15, pg 28). In terms of the proposed contribution of 4,000 dwellings within South Staffordshire toward that overall unmet housing need §5.16 (pg 28) stated that *“Correspondence to date from key Duty to Cooperate partners... has not raised concerns with the council’s proposed contribution”*.
11. In the same paragraph the published SSLP confirmed *“South Staffordshire therefore proposes retaining the 4,000 dwellings contribution towards the unmet need of the housing market area and will adjust the housing target accordingly to deliver this”*. The overall ‘housing target’ for the published SSLP came to the total of 9,089 dwellings.
12. The published SSLP then went on to set out the spatial strategy and made allocations toward meeting that housing target.
13. Subsequent to the Regulation 19 consultation having been undertaken the Council ‘paused’ further work in relation to the SSLP. In its ‘Local Plan Statement’ (dated 20<sup>th</sup> July 2023) the Council stated *“In January this year, work on the review of our new Local Plan was paused awaiting clarity from the government on proposed changes to national planning policy which could have implications for us as a green belt authority”*.
14. The Council’s Local Development Scheme (‘the LDS’) (required by s15 Planning and Compulsory Purchase Act 2004 (as amended) (‘the PCPA’)), dated September 2023, reiterates the commitment made in the 2018 Site Allocations Document (Policy SAD1) for the Council to *“...undertake an immediate review of the Local Plan to help address the emerging housing shortfall emanating from the greater Birmingham Housing Market Area”* (§1.1, pg 1).
15. The LDS explains that whilst work on the SSLP had ‘paused’ between January and July 2023 that, given there was no clear indication of when the revised National Planning Policy Framework (‘NPPF’) might be issued, the Council had resumed ‘work’ on the SSLP (§3.4, pg 3) and identified *“...a need to undertake a further Regulation 19 consultation”*.

16. A further DtC Topic Paper was issued recently in April 2024. Much of the previous discussion as to the quantum of unmet need within the GBBCHMA is reiterated. At §5.9 the paper sets out a change of position by the Council in light of the December 2023 version of the NPPF having been issued:

“The Council were previously of the view that the level of growth proposed (incorporating the 4,000 home contribution to HMA unmet need) would be necessary to have a sound plan, however proposed changes to the NPPF cast doubt over that assertion. Following publication of the updated NPPF in December 2023 and confirmation that there was no requirement for Green Belt boundaries to be reviewed or changed, and it was within the authorities’ gift to choose to do so where they could demonstrate exceptional circumstances, led the Council to change its strategic approach”

17. Instead (§5.11) it is stated that “*The Council is now progressing a capacity-led approach focusing growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements...*”. That approach, it is said, will deliver c640 dwellings toward unmet need arising in the GBBCHMA rather than the previously proposed 4,000 dwellings.

18. The Spatial Housing Strategy Topic Paper (also issued in April 2024) states that “*The preferred spatial strategy has been arrived at through an iterative process of developing the local plan*” (§1.1, pg 1) and that a “*...preferred spatial strategy has been identified*”. That strategy is ‘Option I’ which is the ‘capacity-led approach’ as stated above.

19. Notwithstanding the statement at §4.6 (present in each iteration of the DtC Topic Paper) that “*At each stage of the Local Plan’s Review’s preparation, the Council has sought to be informed by the most up to date Duty to Co-operate position available at that point in time, having regard to the most recent joint evidence and correspondence available at those points in time*” Appendix A (the DtC Schedule) records:

“South Staffordshire Council wrote to all authorities within the GBBCHMA in October 2023 setting out that South Staffordshire was revising its strategy and asked for their initial views on this revised approach. These letters and responses can be found in Appendix...”

20. No Appendix is identified, nor is any such correspondence included within the DtC Topic Paper nor its Appendices. A series of draft Statements of Common Ground are appended

to the DtC Topic Paper, all following a similar form and all explaining the Council’s change of position as regards contributing toward meeting unmet need. None are in final form nor signed, it is not clear at all whether the other joint authorities are content with the proposed wording and / or the change of approach adopted by the Council.

21. ‘Option I’ (nor ‘Option H’) existed prior to the Council ‘pausing’ work on the SSLP and the anticipated publication of the revised NPPF. Neither option includes the 4,000 contribution toward meeting the unmet need of the GBBCHMA. Instead, both adopt a ‘capacity-led’ approach, as explained in the paper being that *“In other words, the overall level of growth is determined by the capacity of the suitable sites that align with the strategic approaches outline. As opposed to the previous proposed approach (under Option B-G) of meeting a top-down determined housing target (i.e. our own needs plus a 4,000 contribution towards the GBBCHMA)”* (§2.7, pg 3).

22. The Council has now published the revised SSLP and is undertaking the Regulation 19 consultation process. The 2024 publication version of the SSLP explains the spatial strategy in terms of housing (§5.12):

“In December 2023 the updated NPPF was published and confirmed that there is no requirement for Green Belt boundaries to be reviewed or changed when Local Plans are being prepared and that it is within authorities’ gift to choose to review Green Belt boundaries through the Local Plan where they feel that exceptional circumstances for doing so exist and these can be fully evidenced and justified.”

23. At §5.16 it is stated that national policy indicates *“...Green Belt release is solely the choice of the council”*.

24. I am asked to consider whether or not the present approach adopted by the Council in terms of progressing the SSLP is in accordance with national policy. As set out below I consider that the Council’s approach is not in accordance with national policy.

## II. DISCUSSION

25. NPPF §35 deals with the examination of local plans confirming that they are to be *“...examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound”*. In order to be found ‘sound’ a local



plan must meet the requirements of being (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy. There has been no change from the previous version of the NPPF in terms of those requirements.

26. Consistency with national policy is further explained as *“enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant”*.

27. The policies in the Framework plainly include those in relation to Green Belt, the point being that the change in approach taken by the Council post July 2023 is expressly stated within the 2024 DtC Topic Paper, the 2024 Spatial Housing Strategy Topic Paper and the SSLP itself to be predicated upon changes to Green Belt policy introduced in the December 2023 version of the NPPF.

28. The Council relies upon NPPF §145:

Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process...

29. The previous version of that same policy (numbered §141) provides:

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

30. Just as with previous revisions to the NPPF the present version contains transitional provisions to account for specific circumstances. NPPF §230 provides:

The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements. For Spatial

Development Strategies, this Framework applies to strategies that have reached consultation under section 335(2) of the Greater London Authority Act 1999 after 19 March 2024. Strategies that reach this stage on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements. Where plans or strategies are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan or strategy produced for the area concerned.

31. Reading the language of the policy in a natural and ordinary way it is clear that a plan which has reached Regulation 19 stage by no later than 19<sup>th</sup> March 2024 must be examined under the relevant previous version of the NPPF. Those which reach Regulation 19 stage after 19<sup>th</sup> March 2024 must be examined under the provisions of the present (December 2023) version of the NPPF.
32. In the present case the SSLP reached Regulation 19 stage in 2022. It is quite correct that the Council is re-consulting on the SSLP through another cycle of the Regulation 19 consultation but that does not detract from the point that the SSLP had *already* reached that point *before* March 19<sup>th</sup> 2024.
33. Nowhere in the SSLP Evidence Base, nor the SSLP itself, is NPPF §230 identified or acknowledged, nor its implications examined. The only rationale provided in the Council's published documents for the change in its approach is the 'change' in national GB policy (along with the datedness of the evidence in relation to the scale of unmet need in the GBBCHMA).
34. It might be said by the Council that the 2024 publication of the SSLP is a *different* plan to that subject to consultation in 2022 such that it is only *this* version of the plan which has reached Regulation 19 stage and so is past the 'cut off' date. Such a contention would be wrong.
35. Firstly, the final paragraph of NPPF §230 deals with the scenario where there might be a 'new' plan subsequent to a previous Regulation 19 consultation. That scenario is where the plan in question has been withdrawn or otherwise does not proceed to form part of the development plan. The SSLP has not been 'withdrawn' (not least because it has yet to have been submitted for examination) nor does the Council suggest that it was abandoned at any point (the work was 'paused').

36. Nor has the SSLP not proceeded to become part of the development plan. The SSLP *continues* (at least presently) through the process to *become* part of the development plan. Whilst it is a revised version of the SSLP now presently advocated by the Council it is still the SSLP. Simply because some revision or modification has occurred doesn't change it into a different plan.

37. That is clear because otherwise *any* modification would result in the 'modified' plan in fact being a 'new plan'. Consider the outcome of an examination in public. In nearly all instances modifications are proposed following examination (some 'major' and some 'minor', some volunteered by the LPA, some 'suggested' by the Examining Inspector).

38. Incorporation of such modifications does not render the subsequent version of the plan a *different* plan to that which was the subject of examination. It does not render it a *new* plan. Nor does it mean that the examined plan has been 'withdrawn' or 'not proceed[ed] to become part of the development plan'. That plan still proceeds to become part of the development plan albeit with revisions.

39. Regulation 5 of the Regulations provides that local development documents ('LDDs') are:

(a) any document prepared by a local planning authority individually or in cooperation with one or more other local planning authorities, which contains statements regarding one or more of the following—

(i) the development and use of land which the local planning authority wish to encourage during any specified period;

(ii) the allocation of sites for a particular type of development or use;

(iii) any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i); and

(iv) development management and site allocation policies, which are intended to guide the determination of applications for planning permission

40. Quite obviously the SSLP is a DPD as it is such a document. It is also, for the purposes of the Regulations a 'Local Plan' as it is a document falling within the descriptions provided at Reg 5(a)(i), (ii) and (iv) (see Regulation 6 'Local Plans').

41. That, even revised, it is the same 'Local Plan' is clear from Regulation 18 which requires that:

(1) A local planning authority must—

- (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
- (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

42. If a revised version of a Local Plan were to be treated as a new, different, Local Plan then the plan-making authority would be required to go back to the very start of the plan-making process and engage in early (Regulation 18) consultation to inform the development of that *new* Local Plan ('must').
43. The consequence of such an approach would be impractical requiring every revised version of a Local Plan to be treated as a new Local Plan and so going back to the very start of the plan making process. That cannot be right as a sensible conclusion as to the consideration of what a 'subsequent plan' might be. The (now revised) SSLP is not a 'subsequent plan' to the (various previous versions) of the SSLP, it is still the same Local Plan which is following a linear process through consultation, then examination and then adoption.
44. So, in the present case, if the Council *do* consider the 2024 publication version of the SSLP to be a *new* Local Plan then rather than simply writing to other LPA's through the DtC process to state that it had revised its approach the Council should, following Regulation 18, have notified all relevant bodies as to the subject of the *new* Local Plan the Council was proposing to prepare and inviting representations as to what it ought to contain.
45. It is clear that the SSLP falls to be examined "*under the relevant previous version of the Framework...*" and so it is the policies of that version of the NPPF which the SSLP falls to be considered against should it proceed to examination.
46. Given that the Council's justification for its (significant) change in approach is its understanding of the change to GB policy in the December 2023 version of the NPPF the approach that it has taken (reliance upon a version of the NPPF against which the SSLP is not to be examined) is not in accordance with national policy (i.e. NPPF §230).
47. Furthermore, on the Council's own stated (in various published documents) understanding of the previous iteration of national GB policy, the strategy now advocated (the 'capacity led' approach) would not be consistent with national policy contained within the relevant iteration of the NPPF (i.e. the version of the NPPF against which the SSLP *is* required to be examined).

48. On either basis the SSLP cannot be found ‘sound’ because it is not consistent with national policy.
49. The Council has either failed to recognise the relevance of NPPF §230 or misunderstood it. It is not clear which given the absence of any reasoning provided in the various documents published.
50. On an entirely separate point the (radically) changed approach of the Council as regards its co-operation and participation in the GBBCHMA is of obvious concern. Much of the evidence base ‘plays up’ the ‘lead’ that the Council has taken in the question of establishing the quantum of unmet housing need and the potential solutions for seeking to meet it.
51. However, once the Council decided that it didn’t need to release Green Belt (post ‘pause’), the contribution which the Council intended to make to solving that regional issue all but evaporated (only a very modest contribution remains proposed). In terms of co-operation with the joint authorities all that the Council has done, since embarking upon such a radically altered approach, is to inform the other authorities that it is doing so. The latest DtC Topic Paper does not even include the correspondence with those authorities despite stating that it does.
52. The NPPF requires LPAs to maintain ‘effective co-operation’, NPPF §26 provides that *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy”*. Proceeding for years through the plan-making process on the premise that a significant contribution would be made within the SSLP toward meeting unmet need to then ‘about face’ and write to all of the authorities to inform that that was no longer the approach is not effective and on-going joint working but the exact opposite. Such an approach does not, and cannot, lead to the production of a positively prepared and justified strategy.
53. This is a further reason why the SSLP, in its now proposed form, is not ‘sound’ as it fails the necessary tests of being ‘justified’ and ‘positively prepared’.

**23<sup>rd</sup> May 2024**

**Christian Hawley**

No5 Chambers



**IN THE MATTER OF THE  
SOUTH STAFFORDSHIRE COUNCIL LOCAL PLAN REVIEW**

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**ADVICE**

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## **Appendix 5: Falling Even Shorter Report**

# Falling Even Shorter

an updated review of unmet housing  
needs in the Greater Birmingham and  
Black Country Housing Market Area

December 2023

**Turley**

# Contents

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1. Introduction and purpose	02
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5. Quantifying the unmet need to 2031 (and beyond)	11
6. Conclusions and recommendations	14

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# 1. Introduction and purpose

Turley is instructed by a consortium of housebuilders and land promoters to provide an updated assessment of the position relating to housing need and land supply across the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA' or 'HMA') in order to quantify the true scale of unmet need to 2031, and beyond.

It is now more than two years since the Turley 'Falling Short' report was published. That report critiqued the 'third position statement', published by the GBBCHMA authorities in September 2020, which claimed only a 2,597 housing shortfall remained across the HMA up to 2031. The Turley 'Falling Short' report found that there was a minimum shortfall up to 2031 of almost 9,000 homes.

An addendum to the third position statement was published in December 2020 followed 'Falling Short' indicating that the scale of unmet need as of 31 March 2020 was 6,302 homes. Since then a further addendum to the third position statement was published in April 2023, that now claims a shortfall of 2,053 homes across the GBBCHMA as of 31 March 2021.

Given the wider national planning policy context, since 'Falling Short' no GBBCHMA authority has adopted a new local plan and progress has been faltering:

- The **Black Country authorities** abandoned preparation of their joint plan in October 2022, despite working on the plan for six years.
- **Bromsgrove District** has not progressed its emerging plan beyond a supplementary consultation to issues and options consultation in autumn 2019, despite committing to a full Green Belt Review and adopting a Local Plan Review by 2023 (as per policy BDP3 of the Bromsgrove District Plan adopted in January 2017), as the adopted plan is not capable of meeting Bromsgrove's housing requirement up to 2030 in full.

- **Lichfield District** withdrew its Local Plan, which included a contribution to the GBBCHMA unmet need, from examination in October 2023.
- **Solihull Borough's** Local Plan remains at examination, despite being submitted in May 2021.
- **South Staffordshire** intend to revisit their emerging local plan and undertake a further reg 19 submission plan consultation in spring 2024, over a year since they consulted on a previous reg 19 submission plan.

That is despite only North Warwickshire having a plan less than five years old, with the four Black Country authorities not having a plan prepared in the context of the National Planning Policy Framework ('NPPF') (2023), and half the GBBCHMA authorities having a plan adopted over ten years ago as of January 2024.

The lack of plan making progress is at risk of significantly impacting a number of the 14 HMA authorities' ability to meet their housing needs, as required by NPPF paragraph 35. This update to 'Falling Short' therefore seeks to quantify the scale of the unmet need across the GBBCHMA as of 31 March 2023. This includes critiquing the GBBCHMA's most recent position statement, published in April 2023, with a base date of 1 April 2021.

## Purpose of this report

This report provides the consortium's independent assessment of the overall housing need and supply position so as to identify the true updated scale of unmet need, focusing on the period to 2031.

The focus upon 2011 to 2031 reflects the timeframe covered by the position statements, as well as various other evidence base studies concerning need and supply prepared since 2013. As with 'Falling Short', this report does consider the position beyond 2031 in high level terms up to 2036 and 2040, mindful that NPPF paragraph 22 requires local plan strategic policies to look ahead over a minimum 15 year period from adoption and set a vision that looks further ahead (30 years), and that all emerging plans are considering plan periods beyond 2031.

## The consortium

The consortium comprises the following housebuilders and land promoters, all of whom play a key role in the strategic planning of sustainable housing delivery across the HMA and wider West Midlands region:

- **Bellway Homes**
- **Catesby Estates Plc**
- **Gladman Developments Ltd**
- **Hallam Land Management**
- **Harworth Group Plc**
- **Taylor Wimpey**
- **Vistry Group Plc**
- **Wain Estates**
- **William Davis Homes**

## Report structure

The report is structured as follows:

- **Section 2** summarises the most up to date GBBCHMA unmet need context.
- **Section 3** assesses the scale of housing need to 2031, and beyond.
- **Section 4** provides an overview of the most up-to-date position in respect to the GBBCHMA's total housing supply for 2011 to 2031.
- **Section 5** draws conclusions on the scale of unmet need to 2031 and beyond, taking into account the HMA's total need and evidenced supply.
- **Section 6** sets out the overall conclusions in respect to the scale of the unmet need.

## 2. Update to GBBCHMA unmet need context

This section provides an update on the GBBCHMA unmet need context, including the current starting point for calculating the unmet need.

### GBBCHMA Position Statement Addendum (April 2023)

The Position Statement Addendum (the 'Addendum'), dated April 2023 and published in October 2023, provides the supply and shortfall position across the GBBCHMA between 2011 and 2031 as of 31 March 2021. The Addendum continues to use the Greater Birmingham HMA Strategic Growth Study ('SGS') (2018) prepared by GL Hearn and Wood as the starting point for calculating the HMA's housing needs. This is reflected on further at section 3 of this report in determining the scale of need for housing across the GBBCHMA.

The Addendum also continues to consider the level of unmet need **up to 2031**, this reflects the timeframes for the SGS, which essentially uses the Birmingham Development Plan's plan period as its starting point.

The Addendum claims the HMA has a housing supply of 205,926 homes for 2011-2031 as of 31 March 2021. Against the SGS' 'baseline' housing need for the same plan period of 205,099 homes, and factoring in a contribution to the Coventry and Warwickshire Housing Market Area ('CWHMA') of 2,880 homes, the Addendum indicates that the remaining shortfall of housing across the HMA has reduced to 2,053 homes.

The Addendum's base date is now more than two years' ago. Firstly, there has been two years' worth of additional monitoring data, and in some cases, updated supply positions, which essentially renders the position in the Addendum out of date (which is explored further at section 4 of this report in terms of how the supply position across the HMA is assessed).

Secondly, in that time there has been limited local plan progress across the entire HMA.

### Local plan progress

With circa 43% of the entire GBBCHMA comprising Green Belt, local plans are an absolutely critical tool in ensuring the HMA meets its housing needs. It is clear that brownfield land will not be enough to meet the HMA's needs, as demonstrated by the shortfall that still remains unaccounted for from the Birmingham Development Plan adopted nearly seven years' ago, and the emerging Dudley and Sandwell plans and their associated evidence bases (which are discussed below).

Almost three years have passed since 31 March 2021. In that time there has been limited progress in advancing local plans across the HMA. Even since April 2023, the context has significantly changed and plan making across the HMA has faltered, as summarised below:

- The **Black Country authorities** abandoned preparation of their joint plan in October 2022, despite working on the plan for six years. Following this each local authority is now preparing its own individual plan. So far Sandwell has published a draft plan with a 18,606 housing shortfall (62% of the borough's total need), and Dudley's draft plan proposes a shortfall of 1,078 homes (9% of the borough's total need).
- **Bromsgrove District** has not progressed its emerging plan beyond a supplementary consultation to their issues and options consultation in autumn 2019, despite committing to a full Green Belt Review and adopting a Local Plan Review by 2023 (as per policy BDP3 of the Bromsgrove District Plan adopted in January 2017), as the adopted plan is not capable of meeting Bromsgrove's housing requirement up to 2030 in full.



- **Lichfield District** withdrew its Local Plan, which included a contribution to the GBBCHMA unmet need, from examination in October 2023.
- **Solihull Borough's** Local Plan remains at examination, despite being submitted in May 2021. The examination was paused in June 2023, pending any updates to the NPPF.
- **South Staffordshire** intend to revisit their emerging local plan and undertake a further reg 19 submission plan consultation in spring 2024, over a year since they consulted on a previous reg 19 submission plan.

This is despite national planning policy requiring reviews of plans every five years. Only North Warwickshire have a plan less than five years old, the four Black Country authorities do not have a plan prepared in the context of the National Planning Policy Framework ('NPPF') (2023), and half the GBBCHMA authorities have a plan adopted over ten years ago as of January 2024

Furthermore, it does not appear that this position will change in the short term. Just four authorities have local development schemes committed to submitting a plan before the end of 2024, with a further three committed to submitting before the end of 2025.

With the HMA significantly constrained by Green Belt, local plans are critical to ensuring its housing needs are met in full as brownfield land will not have sufficient capacity alone. Without local plans being advanced reviewing Green Belt boundaries, it is unlikely the GBBCHMA's housing needs can be met in full. This is the critical matter that this report will explore.



## 3. Scale of need up to 2031 and beyond

### Considering the need to 2031

The Addendum continues to reference the ‘baseline’ scenario from the SGS, which suggests a minimum need for 205,099 homes between 2011 and 2031 or 10,255 homes per annum on average.

While this technically remains the last study to have consistently assessed need in all 14 authorities, it is clearly becoming increasingly dated having been finalised almost six years ago in February 2018, and no doubt produced over an extended period prior to that. The extent to which the SGS continues to represent ‘up-to-date evidence’, of the kind that the NPPF at paragraph 31 expects to underpin all planning policies, is therefore open to question. It patently does not allow for the population of the HMA to be some 4% larger than it was then, nor for the area to offer around 8% more jobs, and for the affordability of housing relative to earnings to have worsened in every single authority by an average of 19%<sup>1</sup>.

The SGS has undoubtedly had value in providing a consistent assessment of need across the HMA, but circumstances have changed with the introduction of a standard method that has now been required to form the basis of plan-making for almost five years. It was explicitly designed to standardise assessments of housing need, bringing consistency between local authorities and consequently filling at least part of the role formerly played by the SGS. Many of the authorities in the HMA appear to have taken the same view, having commissioned various studies that feature the standard method which generally consider it to provide a reliable indication of their local housing need.

As such, it is highly relevant to note that the standard method suggested a greater need for some **11,868 dwellings per annum** as of April 2021, the base date of the Addendum.

However, this is known to have underestimated the full need as it included a figure for Birmingham that was capped above an existing requirement, but the lifting of the cap in January 2022 – when the Birmingham Development Plan became more than five years old – elevated the need to **at least 13,868 dwellings per annum** and it subsequently rose even further, to at least **14,341 dwellings per annum** in April 2023, when new affordability data was taken into account.

This should not necessarily replace in full the scenario developed in the SGS, which looked back to 2011, but that should equally not take precedence over a standard method that has now been in place for almost five years. The NPPF makes clear at paragraph 61 that it should be used to assess the minimum need for housing in all but exceptional circumstances, which have clearly not been demonstrated by the local authorities in this area.

A sensible and rational approach in these circumstances, which provides a level of consistency with the SGS while adhering to current national policy, would be to align with the SGS ‘baseline’ scenario in the ten years to the base date of the Addendum (2011-21) before aligning with the outcome of the standard method, as of the base date of April 2021, for the second ten-year period<sup>2</sup> (2021-31). This results in a minimum need for **221,230 homes** over the entire twenty years, some 8% more than suggested by the PSA<sup>3</sup>.

That said, with the outcome of the standard method known to have been an underestimate in April 2021 – rising thereafter, due to worsening affordability and the lifting of the cap in Birmingham – it is arguably also appropriate to consider a scenario based on the current outcome of the standard method (14,341dpa). This would suggest a substantially greater need – for some 237,788 homes in total – even if it was to be applied only from 2023 onwards, reverting to the SGS for the prior two years to avoid using the outcome of the standard method so retrospectively.

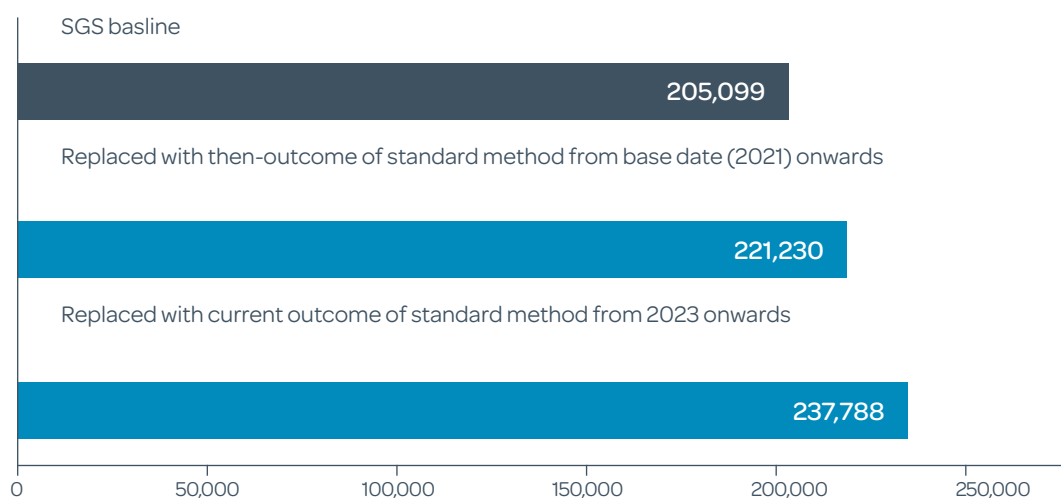
<sup>1</sup> Comparing data for 2022 to equivalent figures for 2015, where this appears to have been the latest population data available when the SGS was prepared (according to its paragraph 3.26)

<sup>2</sup> 11,868 dwellings per annum

<sup>3</sup> Excluding the 2,880-home contribution to the Coventry and Warwickshire HMA, which – though included in the Addendum – is considered separately in this report’s section 5



**Figure 3.1:** Turley Estimates of Overall Housing Need (2011-31)



Source: Turley analysis

## Looking beyond 2031

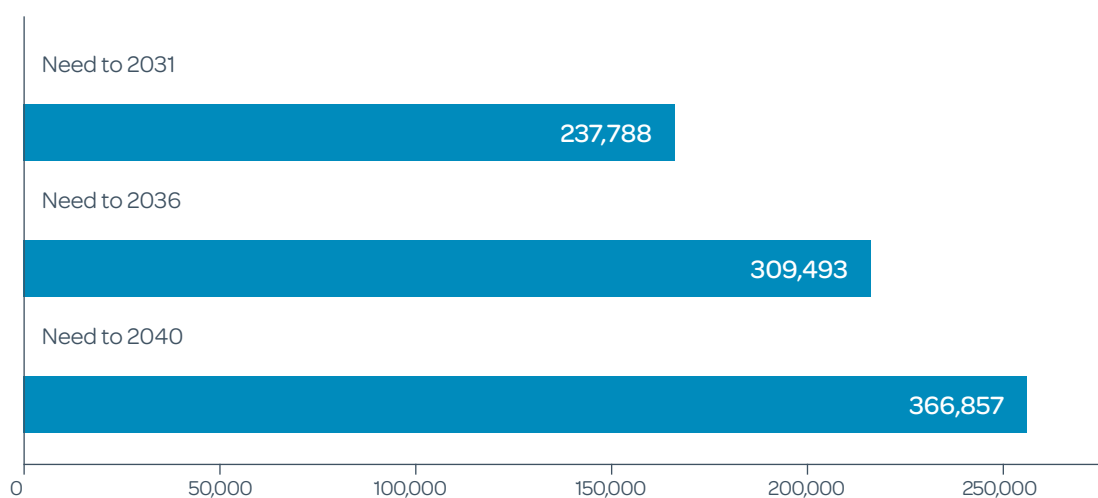
While the above – like the Addendum – provides an estimate of need to 2031, it can be easily extended to cover a longer period to 2036 or 2040.

This is important because NPPF paragraph 22 requires emerging local plans in the HMA to look at least 15 years into the future, such that they are seeking to deliver strategic growth into the late 2030s and even beyond in some cases.

While the standard method technically draws upon a ten-year baseline, the PPG makes clear that its outcome can be extrapolated as necessary to cover any period<sup>4</sup>.

It is not considered appropriate to extrapolate the capped figure in this way but using the current outcome of the standard method from 2023 onwards and using the SGS 'baseline' to that point, suggests that some 309,493 homes are needed throughout the HMA between 2011 and 2036. Circa 366,857 homes are implied to be needed when using the same approach for the period from 2011 to 2040.

**Figure 3.2:** Estimated Need to 2036 and 2040



<sup>4</sup>PPG Reference ID 2a-012-20190220

## 4. Establishing the GBBCHMA supply for 2011-2031 (and beyond)

'Falling Short' sets out general observations in respect to the supply identified in the third position statement (September 2020), and the majority of those remain relevant in respect to the Addendum, including:

- It only addresses 2011 to 2031 despite local plan reviews now looking well beyond that.
- The base date then was 31 March 2019 and more than two years had passed at the point of 'Falling Short' being published, with the Addendum having a base date of 31 March 2021 the supply data remains two years out of date.
- The supply is broken down into different categories for all 14 authorities, however the raw data underpinning this is not provided as part of the Addendum, or any previous position statement.
- The supply data has not been independently examined.
- The supply is 'unadjusted' as it does not apply the standardised non-implementation discount rates from the SGS which provided a consistent approach across the HMA. Instead, only local discount rates are applied so several authorities do not apply any discounts for non-delivery (Birmingham, Bromsgrove, Redditch and Stratford).

The 14 authorities' agreed position in respect to the extent of the total supply across the entire GBBCHMA between 2011 and 2031 is **205,926 homes**, as presented at paragraph 3 of the Addendum. The Addendum has a base date of 31 March 2021 and includes all completions up to that point. This represents a total shortfall of 2,053 homes, a significant reduction from 6,302 homes as of 31 March 2020 (as presented in the December 2020 Addendum to the third position statement). Paragraph 3 of the Addendum states that Birmingham is responsible for the majority of the additional capacity identified.

More than two years have passed since then, the Addendum therefore does not reflect any housing completions or additional supply which has come forward in the intervening period. This report therefore seeks to assess the GBBCHMA's supply based on the most up-to-date evidence available.

## Method of analysis

A critical factor in any analysis of the shortfall position across the GBBCHMA is an accurate position of the HMA's overall supply.

To understand the 14 authorities' current supply positions this report has reviewed in detail all the most up-to-date evidence, which is summarised in Table 4.1 below.

**Table 4.1:** Source of evidence for completion and supply data

Authority	Most up-to-date evidence	Base date
Birmingham	2020 SHLAA (March 2022) and Five Year Housing Land Supply Statement 2023-2028	31 March 2023
Bromsgrove	Housing Land Supply in Bromsgrove 2011-2022 (April 2023)	31 March 2023
Cannock Chase	Authority Monitoring Report 2021-22 (undated)	31 March 2021
Dudley	SHLAA 2021/22 Update (undated)	31 March 2022
Lichfield	Five Year Housing Land Supply 2023 (July 2023)	31 March 2023
North Warwickshire	Annual Monitoring Report Up to 31 March 2022 (November 2023)	31 March 2022
Redditch	Housing Land Supply in Redditch 2011-2022 (April 2023)	31 March 2023
Sandwell	SHLAA and 5 Year Housing Land Supply Update as of April 2022 (October 2023)	31 March 2022
Solihull	Examination of Solihull Local Plan – Housing Trajectory and Five Year Housing Land Supply (December 2021) / Draft SHELAA Update 2020 (October 2020)	31 March 2021
South Staffordshire	Housing Monitoring and Five Year Housing Land Supply 2022-2023 (December 2023)	31 March 2023
Stratford	Authority Monitoring Report 2021-22 (December 2022), SHLAA and Five Year Housing Land Supply report Update March 2023	31 March 2023
Tamworth	Draft Housing Delivery Paper (December 2023)	31 March 2023
Walsall	Strategic Housing Land Assessment and Statement of Housing Land Supply 2022 (undated)	31 March 2022
Wolverhampton	SHLAA 2022 (September 2023)	31 March 2022



The majority of the GBBCHMA authorities' most up-to-date evidence available is prepared on the basis of a 31 March 2022 base date, though there are a few exceptions where it is based on an older base date of 31 March 2021 (i.e. Birmingham, Solihull, and Stratford).

This report's independent assessment of the supply position across the GBBCHMA is on the basis of a **31 March 2023 base date**. To complement the 14 authorities' most up-to-date evidence this report uses the DLUHC's net additional dwellings by LPA table (table 122)<sup>5</sup> so that it reflects the most up-to-date data for completions for 2022-23 (i.e. up to 31 March 2023), and for those authorities who only provide completion data for 2020-21 (i.e. up to 31 March 2021).

As part of this exercise, all 14 authorities were contacted to confirm the data that was used to inform the addendum and the most-up-date source of evidence in respect to housing supply.

## Supply position

Based on the above methodology, the most up-to-date evidence demonstrates that the total supply across the GBBCHMA between 2011 and 2031 is **199,992 homes**.

As per paragraph 4 of the Addendum, the Coventry and Warwickshire Housing Market Area (CWHMA) Memorandum of Understanding assumes that a total of 2,880 homes from North Warwickshire and Stratford are to contribute to that HMA's unmet needs. Reflecting the Addendum's approach, the report therefore adds this contribution to the minimum housing requirement, when quantifying the housing need at section 5.

This is even before interrogating the components of supply which make up each authorities' supply. For instance, Birmingham has assumed that the Langley SUE will deliver 1,500 homes before 2031, despite no reserved matters submissions being made for the site. It also does not include a standardised non-implementation discount rate, therefore the individual supply position for at least four of the authorities does not factor in any non-implementation discount.

Reflecting the above, the supply position of **199,992 homes** can therefore be assumed to be a 'best case' scenario.



<sup>5</sup>DLUHC Live tables on housing supply: net additional dwellings by LPA (<https://www.gov.uk/government/statistical-data-sets/live-tables-on-house-building>)

## 5. Quantifying the unmet need to 2031 (and beyond)

Having presented the most up-to-date scenarios in terms of the HMA's needs at section 3 and supply at section 4, this section quantifies the true scale of the HMA's unmet need between 2011 and 2031.

### Addendum shortfall position

Set out in Table 5.1 below is the shortfall position based on the Addendum's claimed supply of **205,926 homes**.

**Table 5.1:** Scale of GBBCHMA shortfall based on Addendum claimed supply

	SGS baseline	Replaced with then-outcome of standard method from base date (2021) onwards	Replaced with current outcome of standard method from 2023 onwards
Need	205,099	221,230	237,788
Minimum need plus CWHMA contribution	207,979	224,110	240,668
Addendum claimed supply	205,926	205,926	205,926
<b>Scale of shortfall</b>	<b>2,053</b>	<b>18,184</b>	<b>34,742</b>

Using a base date of 31 March 2021 and not seeking to interrogate the data presented in the Addendum, the claimed shortfall is 2,053 homes based on the SGS baseline.

The Addendum however fails to fully acknowledge that circumstances have changed since the SGS was published with the introduction of the standard method. The starting point for calculating unmet need should therefore be based on using the standard method to calculate housing need from the base date of 31 March 2021.

When applying the then-outcome of the standard method from the base date, the shortfall is 18,184 homes. If the current standard method were to be applied from the current base date of 31 March 2023, the approach advocated by this report for the reasons set out at Section 3, the shortfall is 34,742 homes.

As national planning policy and guidance is clear that standard method is to be used as the starting point for calculating housing need, reflecting a base date of 31 March 2023 and the 14 authorities' claimed position alone, the shortfall position across the GBBCHMA stands at 34,742 homes.



## Turley shortfall position

The Addendum was based on data with a 31 March 2021 base date. As discussed earlier there is now more up-to-date evidence for the majority of authorities in terms of both completions and proposed supply, as well as national completion data.

Section 4 of this report has therefore calculated a total supply position using a base date of 31 March 2023. Table 5.2 below sets out the Turley supply position against the different need positions.

**Table 5.2:** Scale of GBBCHMA shortfall based on Turley supply position

	SGS baseline	Replaced with then-outcome of standard method from base date (2021) onwards	Replaced with current outcome of standard method from 2023 onwards (Turley advocated approach)
Need	205,099	221,230	237,788
Minimum need plus CWHMA contribution	207,979	224,110	240,668
Turley supply	199,992	199,992	199,992
<b>Scale of shortfall</b>	<b>7,987</b>	<b>24,118</b>	<b>40,676</b>

Using the most up to date base date, following the Addendum's approach of using the SGS baseline housing need figure, the shortfall is **7,897 homes** across the HMA up to 2031.

Reflecting national planning policy and guidance, the housing need scenarios which incorporate the standard method should be used as a starting point for calculating the HMA's unmet needs, in particular the scenario which uses the current outcome of the standard method from 2023 onwards. When these are applied the shortfall ranges between **24,118** and **40,676 homes**.

The above assumes the supply data in each authorities' evidence base documents is accurate. Given the minimum shortfall position on the council's and government evidence alone is significant, it is not necessary to further interrogate in detail the components of supply. However, a review of the evidence base documents demonstrates that some sites included in supplies do not meet the definition of deliverable for reasons such as still being in another use.

Ambitious delivery rates which are unlikely to be met have also been assumed for some sites. Indeed it has been assumed the Langley SUE will deliver 1,500 homes before 2031, despite no reserved matters submissions being made for the site.

## Conclusions on unmet need to 2031

The above analysis reveals that there remains a significant unmet need across the HMA to 2031 with the window to deliver this continuing to narrow.

The 14 authorities should be planning positively to deliver the most recent standard method need and ensuring the unmet need of **40,676 homes** up to 2031 as reflected in the most up-to-date evidence is accommodated in full through emerging local plans.

## Looking ahead – an indication of the shortfall to 2036 and 2040

As with 'Falling Short', it is difficult to accurately quantify the unmet needs beyond 2031 because there remains an incomplete picture in terms of the HMA's housing supply beyond this date. This report provides an indication of the potential scale of unmet need between 2011 and 2036, and 2011 and 2040, based on each authorities' most up-to-date evidence.

From reviewing the data it is clear there is no supply information for the majority of authorities post 2031. This report has therefore taken the same approach as 'Falling Short' and therefore sought to extrapolate the Addendum and Turley supply position by annualising the supply figure (10,296 homes and 10,000 homes, respectively rounded up) and applying the annual figure each year beyond 2031.

This has been tested against the 2036 and 2040 need positions which use the standard method from 2023 onwards, the approach this report advocates as presented at section 3.

This approach is relatively simplistic and crude and it is arguable as to whether the urban areas can continue to deliver at rates similar to 2011-2031 and how any changes to national planning policy may impact this. It however provides a useful indicator as to the potential scale of the shortfall post-2031, as summarised below.

**Table 5.3:** Scale of GBBCHMA shortfall up to 2036 and 2040

	Need to 2036	Need to 2040
Need	309,493	366,857
Need with CWHMA contribution	312,373	369,737
Addendum claimed supply (extrapolated)	257,400	298,584
<b>Shortfall against claimed Addendum supply</b>	<b>54,973</b>	<b>71,153</b>
Turley supply (extrapolated)	250,000	290,000
<b>Shortfall against Turley supply</b>	<b>62,373</b>	<b>79,737</b>

As referred to above, this exercise provides the likely direction of travel in terms of unmet need across the HMA, which will likely be established via emerging local plans with unmet need, such as Birmingham.

## 6. Conclusions and recommendations

The 14 Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') authorities published in October 2023 (dated April 2023) their updated Position Statement Addendum ('the Addendum'). The headline conclusion was that, as of 31 March 2021, the 2011 to 2031 shortfall across the GBBCHMA is estimated to be 2,053 homes.

In response this report has been commissioned by a consortium of housebuilders and promoters to provide an updated position to the Turley 'Falling Short' report (August 2021) to take stock of the position in order to quantify the true scale of unmet to 2031, and beyond.

As with 'Falling Short', this report has focused on 2011 to 2031 as the timeframe covered by the Addendum. The report has however looked beyond 2031 in high-level terms given emerging plans across the GBBCHMA will go well beyond 2031.

The Addendum, published in October 2023, claims the GBBCHMA's shortfall arising between 2011 to 2031 has now reduced to 2,053 homes. This is however predicated on a base date of 31 March 2021, nearly three years ago. In that time, there is now additional monitoring data, and updated supply positions from the majority of GBBCHMA authorities, which has not been reflected in the Addendum's findings.

Furthermore, the Addendum continues to reference a need for **205,099 homes** over the period from 2011 to 2031, based on the Greater Birmingham HMA Strategic Growth Study (2018) that is increasingly dated having been produced almost eight years ago.

The standard method has since been introduced, offering the consistency that the SGS itself sought to provide. While this cannot be backdated to 2011, it can be reasonably used in place of the SGS scenario as an indicator of future needs.

Applying it from the base date of the Addendum (31 March 2021) suggests that some **221,230 homes** are needed between 2011 and 2031 but this rises to **237,788** when the current outcome is used from 31 March 2023 onwards, allowing for worsening affordability and the removal of the cap for Birmingham. This approach, which best reflects national policy, indicates that some 309,492 homes are needed over the longer period from 2011 to 2036, with 366,857 needed to 2040.

As national planning policy and guidance is clear that the standard method is to be used as the starting point for calculating housing need, reflecting a base date of 31 March 2023 and the 14 authorities' claimed position, the shortfall position across the GBBCHMA stands at **34,742 homes**. Based on the Turley supply this shortfall increases to **40,676 homes**. This is the scale of unmet need that best represents the most up-to-date evidence. This shortfall increases to **62,373 homes** up to 2036, and **79,737 homes** up to 2040, when extrapolating the available supply data.

As required by the duty to cooperate it is critical that this quantified unmet need up to 2031 should be distributed between emerging local plans and delivered. This will require difficult decisions, including reviewing Green Belt boundaries.

As suggested in 'Falling Short', it remains the case that a strategic plan or framework is required to cover long term growth across the GBBCHMA, potentially to 2040 and beyond.







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# Turley



## **Appendix 6: Landscape and Green Belt Review**



**Land at  
Wombourne**

**Landscape and  
Green Belt  
Review**

Prepared by:  
**The Environmental  
Dimension  
Partnership Ltd**

On behalf of:  
**Bellway Homes Ltd**

May 2024  
Report Reference  
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## Appendices

<b>Appendix EDP 1</b>	Findings of EDP Data Trawl
<b>Appendix EDP 2</b>	EDP Green Belt Assessment Methodology and Criteria
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## Plans

<b>Plan EDP 1</b>	Site Context and Designations (edp7419_d001b 10 December 2021 JTF/LTi)
<b>Plan EDP 2</b>	Green Belt Context (edp7419_d002 10 December 2021 SW/LTi)

*This version is intended for electronic viewing only*

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001c	DRo	-	-	FMi 170524

## Section 1 Introduction and Purpose

### Introduction

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been commissioned by Bellway Homes Ltd to undertake a Landscape and Green Belt Review of a potential development site located within the Green Belt to the north of Wombourne, South Staffordshire. The potential site is situated on a triangular piece of land between Strathmore Crescent to the east and the South Staffordshire Railway Walk in the west (hereafter referred to as the 'site') within the northern extent of the settlement. This report forms part of a promotion of land located in the Green Belt and determines its potential for development.
- 1.2 The site lies within the South Staffordshire Green Belt and is identified as part of Green Belt parcel S53 by the Green Belt Study<sup>1</sup>. The Landscape and Sensitivity Study<sup>2</sup> places it within landscape parcel SL21. It is further mentioned in the Strategic Housing and Economic Land Availability Assessment (SHELAA)<sup>3</sup> as a potential development site.
- 1.3 This report should be read in conjunction with the Environmental Context Plan provided at **Plan EDP 1**. The site is illustrated on **Figure EDP 1.1** below.



**Figure EDP 1.1:** Aerial Image showing site location.

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<sup>1</sup> LUC (2019), South Staffordshire Green Belt Study, South Staffordshire District Council

<sup>2</sup> LUC (2019), South Staffordshire Landscape Sensitivity Study, South Staffordshire District Council

<sup>3</sup> South Staffordshire Council (2020), SHELAA, accessed at *SHELAA & 5 Year Housing Land Supply South Staffordshire Council* ([sstaffs.gov.uk](http://sstaffs.gov.uk)) on 04.11.2021

- 1.4 EDP is an independent environmental planning consultancy with offices in Cirencester, Cardiff and Cheltenham. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website ([www.edp-uk.co.uk](http://www.edp-uk.co.uk)).
- 1.5 The purpose of this Landscape and Green Belt Review is to assess the extent to which the site performs, in landscape and visual terms, in relation to its contribution to the purposes of the Green Belt as outlined in the National Planning Policy Framework (NPPF)<sup>4</sup>. The Green Belt review provides a site-specific evaluation to supplement the existing, wider Green Belt Review and to determine the suitability for development.
- 1.6 The landscape and visual review evaluates the site's sensitivity to development in relation to the existing Landscape Sensitivity Study, and the Council's contentions in relation to this; in particular that the site is of higher sensitivity to other land around the settlement.
- 1.7 EDP's work has included the following key strands:
- A review of relevant planning policy and context;
  - A desktop study and web search of relevant background documents and maps;
  - A field assessment of local site circumstances, undertaken by a qualified landscape architect, including a photographic survey of the character and context of the site and its surroundings; and
  - A summary of the key constraints and opportunities identified through desk study and site analysis undertaken by EDP.

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<sup>4</sup> National Planning Policy Framework (2021), Ministry of Housing, Community and Local Government, London



## Section 2 Planning Context

### Planning Context

- 2.1 Relevant planning policy in relation to the Green Belt designation and matters relating to landscape and visual circumstances have been reviewed and are summarised below.

#### **National Planning Policy Framework (NPPF)<sup>5</sup>**

- 2.2 The NPPF requires land to demonstrate that it contributes towards the essential characteristics of openness and permanence by meeting one or more of five purposes, or 'tests', of Green Belt designation, which are set out at Paragraph 143 as follows:

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

- 2.3 For each NPPF purpose, EDP has defined criteria that allows for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the open character of the Green Belt in this location.

- 2.4 Paragraph 145 highlights the possibility to review and alter Green Belt boundaries, where exceptional circumstances have been identified and justified. *"Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans".*

- 2.5 Planning practice Guidance (PPG) for the NPPF notes that where land is released from the Green Belt, "compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land" should be considered.

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<sup>5</sup> National Planning Policy Framework (2023), Ministry of Housing, Community and Local Government, London

**South Staffordshire Core Strategy (December 2012)<sup>6</sup>**

- 2.6 The South Staffordshire Core Strategy (SSCS) provides an overview of policies and strategies which will shape future development in the district. The following is a summary of relevant planning policy.
- 2.7 The Core Strategy outlines the strategic objectives for the district. Strategic Objective 1 states that the Council aims to “*protect and maintain the Green Belt and Open Countryside in order to sustain the distinctive character of South Staffordshire*”. Strategic Objective 2 further identifies the goal to “*protect and retain the important strategic gaps between existing settlements*”. Strategic Objective 4 states that the plan aims to “*protect, conserve and enhance the countryside, character and quality of the landscape*”.
- 2.8 Policy GB1: Development in the Green Belt identifies development that would be considered appropriate within the Green Belt designation. This includes new buildings for:
- “c) *affordable housing where there is a proven local need in accordance with Policy H2.*”
- 2.9 Core Policy 2: Protecting and Enhancing the Natural and Historic Environment outlines opportunities for development which would be supported by the Council. This includes development that:
- “b) *are not contrary to the control of development within internationally, nationally or locally designated areas including the Green Belt and Open Countryside [...]; and*
- e) *provide mitigation or compensatory measures to address any potential harmful implications and supporting enhancement measures.*”
- 2.10 Policy EQ4: Protecting and Enhancing the Character and Appearance of the Landscape states that the typical “*rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced*”. It emphasises the need for development proposals to be appropriate within their context with regards to scale, layout and location.

**Strategic Housing and Economic Land Availability Assessment (SHELAA)<sup>7</sup>**

- 2.11 The SHELAA provides an overview of sites that are suggested for potential housing or employment development. The site is included as site 708, which is identified as “*potentially suitable but subject to policy constraints*”.

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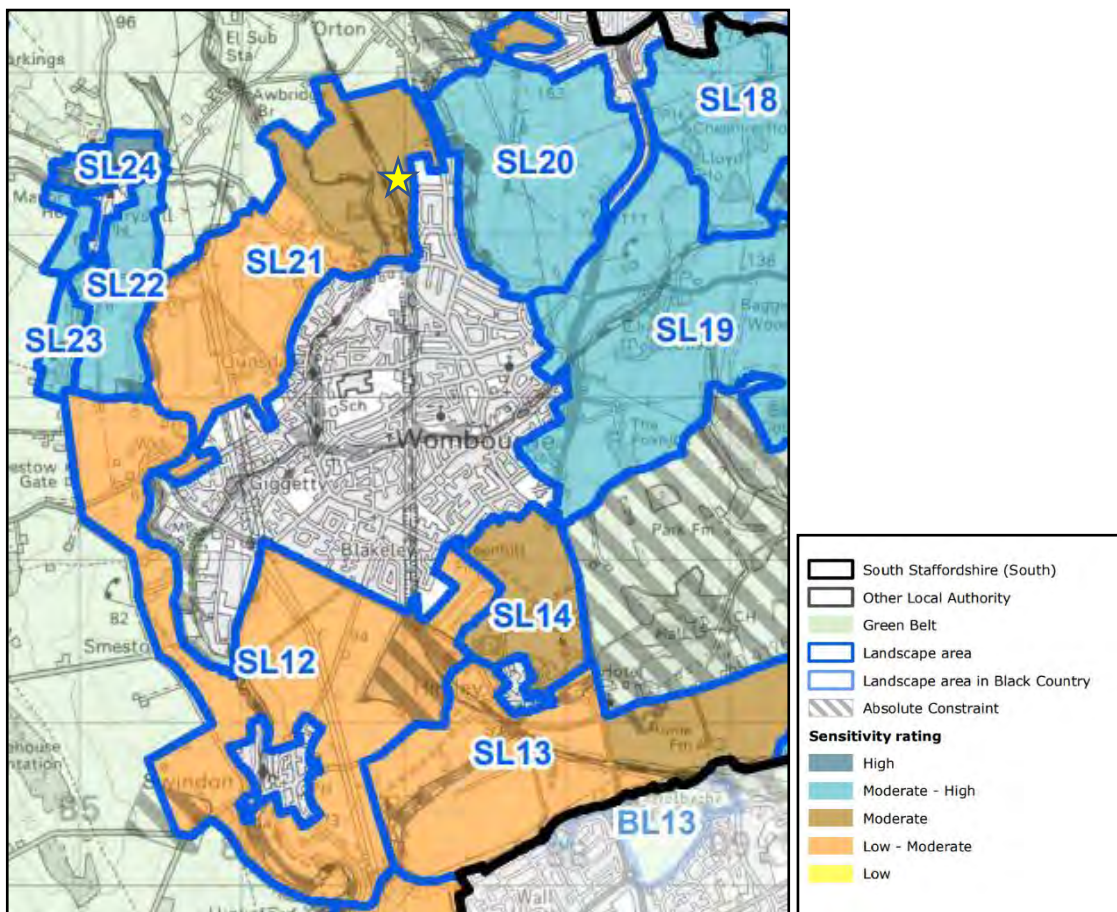
<sup>6</sup> South Staffordshire Council (2012), Core Strategy Development Plan

<sup>7</sup> South Staffordshire Council (2020), SHELAA, accessed at SHELAA & 5 Year Housing Land Supply South Staffordshire Council (sstaffs.gov.uk) on 04.11.2021

## Section 3 Landscape Context

### South Staffordshire Landscape Sensitivity Study (2019)<sup>8</sup>

- 3.1 The South Staffordshire Landscape Sensitivity Study considers the sensitivity of land to potential built development within the Green Belt designation in South Staffordshire. Wombourne is identified as a main service village within the district. The site is located in the eastern part of landscape area SL21 (as shown on **Figure EDP 3.1**).



**Figure EDP 3.1:** Location of landscape parcel SL21 (indicated by the yellow star).

- 3.2 Areas of land on the settlement edge with semi-rural land-uses are identified as potentially sensitive to built form “due to their role in providing a perceived gap and preventing coalescence between the wider conurbation and individual villages, such as Wombourne”. It highlights the opportunity for landscape features to “provide significant boundary features separating urban areas from the surrounding countryside”.
- 3.3 The study identifies SL21 as having both a low to moderate, and also moderate, landscape sensitivity. The site falls within the eastern extent of the landscape area, which is classed

<sup>8</sup> LUC (2019), South Staffordshire Landscape Sensitivity Study

as having moderate sensitivity. The study defines moderate sensitivity as landscape which has “*some distinctive characteristics and valued qualities, with some sensitivity to change as a result of introducing built development*”.

- 3.4 The study provides a wider overview of the whole landscape area SL21. This is limited in identifying the site’s sensitivity to development. While it provides a useful overview to the landscape’s condition, it is not considered to assess the site’s sensitivity in sufficient detail. A detailed assessment of the site in relation to the Green Belt designation is provided in **Section 5** of this report.

### **Environmental Designations**

- 3.5 This section summarises the relevant landscape and environmental designations within 1km of the site boundary. Further information is provided on **Plan EDP 1**.

### **Public Rights of Way (PRoW)**

- 3.6 There are no Public Rights of Way (PRoW) located within the site. The following footpaths are located within 1km of the site:

- The Monarch’s Way long distance footpath lies approximately 10m west of the site;
- Footpath Wombourne 23 follows the eastern boundary of the site;
- Footpath Wombourne 20 approximately 600m to the north of the site;
- Footpath Lower Penn 2 approximately 720m to the north of the site;
- Footpath Wombourne 42 approximately 220m to the north-east of the site;
- Bridleway Wombourne 16 approximately 650m to the east of the site;
- Bridleway Wombourne 15, approximately 650m to the east of the site;
- Footpath Wombourne 17, approximately 530m to the east of the site;
- Footpath Wombourne 24, approximately 640m to the south of the site; and
- Footpath Trysul and Seisdon 13 lies approximately 940m to the west of the site.

### **Sites of Special Scientific Interest (SSSI)**

- 3.7 There are no Sites of Special Scientific Interest (SSSI) present within the sites. The South Staffordshire Railway Walk is a linear SSSI that lies immediately to the west of the site.

### **Conservation Areas**

3.8 There are no Conservation Areas present within the site. The following Conservation Areas are located within 1km of the site:

- Wombourne Conservation Area, approximately 890m to the south-east of the site; and
- Staffordshire and Worcestershire Canal Conservation Area approximately 550m to the west, following the Canal's route.

### **Heritage Assets**

3.9 There are no heritage assets located within the site. There are seven listed features within 1km of the site. These include:

- Grade II listed Orton Grange approximately 620m to the north;
- Grade II listed White Cross House approximately 780m to the north;
- Grade II listed Orton House and attached stable approximately 990m to the north;
- Grade II\* listed The Bratch Water Pumping Station approximately 380m to the south - west;
- Grade II listed Staffordshire and Worcestershire Canal Bratch Locks, Bridge No 47 and toll house approximately 390m to the south-west; and
- Grade II listed Staffordshire and Worcestershire Canal Cottage at Bumblehole Lock approximately 900m to the south-west.



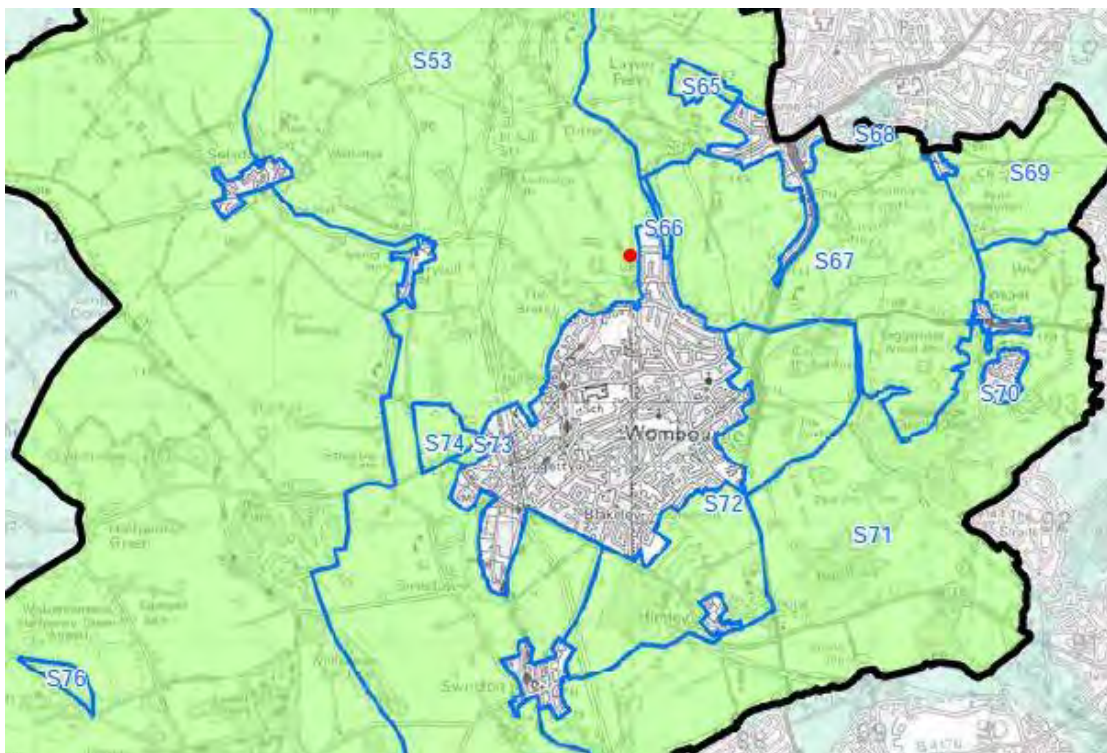
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## Section 4 Green Belt Context

### South Staffordshire Green Belt Study<sup>9</sup>

4.1 The site lies within the South Staffordshire Green Belt to the north of Wombourne. The Green Belt study is divided into two parts, which summarise the condition and contribution of identified parcels to the purposes of the Green Belt and then go on to evaluate their sensitivity in relation to development. The site, which covers an area of approximately 3 hectares (ha), is identified as Parcel S53 (as shown in **Figure EDP 4.1**), which extends north beyond Pattingham and has an overall area of 3,072ha. Generally, the study highlights the following in relation to the parcel:

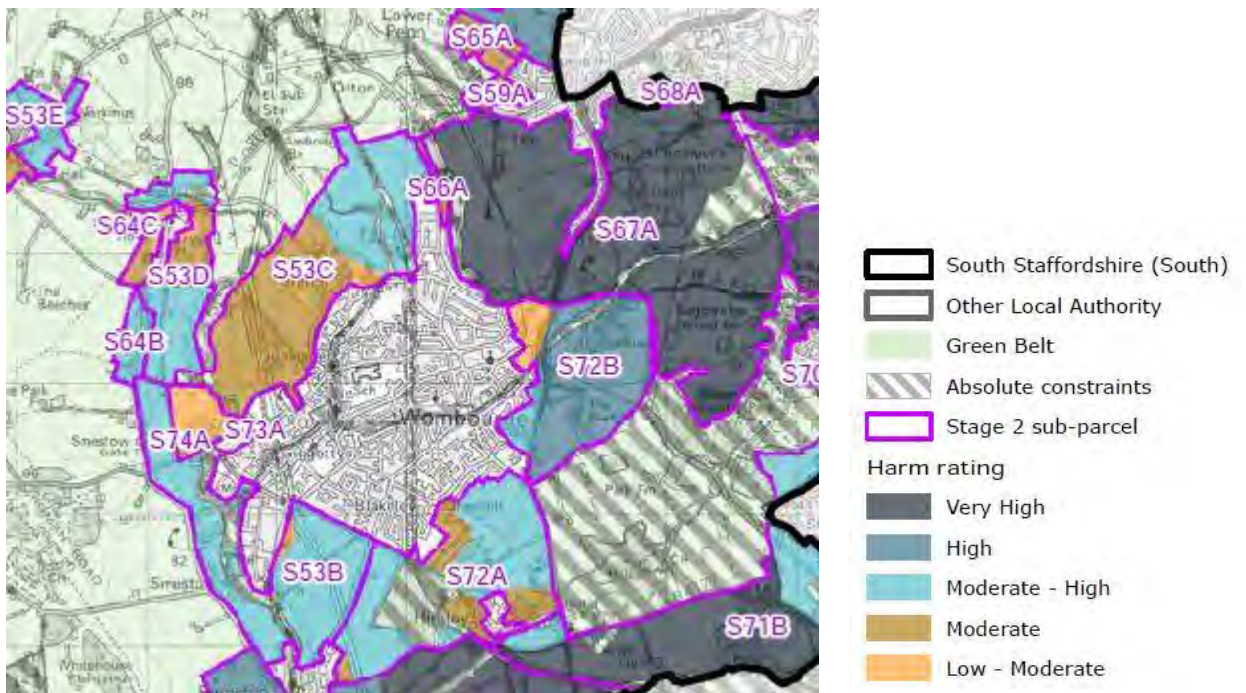
- Parcel S53 is noted as having moderate contribution to purpose 1 of the Green Belt;
- It has weak or no contribution to purpose 2 and 4 of the Green Belt; and
- It has strong contribution to purpose 3 of the Green Belt.



**Figure EDP 4.1:** Extract from Green Belt study showing location of the site (red dot) in relation to identified Green Belt parcel S53.

<sup>9</sup> LUC (2019), South Staffordshire Green Belt Study, South Staffordshire District Council

4.2 The parcel is further divided into sub parcels, of which the site falls into Parcel S53C (as shown in **Figure EDP 4.2**). The site is located in the eastern extent of the parcel, which is noted as having moderate to high harm rating.



**Figure EDP 4.2:** Extract from Green Belt Study showing Green Belt Parcel S53 C and sensitivity to development.

4.3 The study further places the site within sub parcel S53C. This is further divided into parcels of development scenarios and any release of land “to the north of the Staffordshire and Worcestershire Canal” is placed within sub parcel S53C-S1 (as shown on **Figure EDP 4.3**) and is evaluated as being of moderate to high sensitivity. The site covers a small part of the overall parcel, which extends to the west and covers an area of approximately 61.85ha. The study states that the sub parcel “makes a strong contribution to preventing encroachment on the countryside and a moderate contribution to preventing sprawl of the West Midlands conurbation”. However, it does note that “there is no strong distinction between this relatively flat sub-parcel and the inset settlement edge of Wombourne”. The parcel is separated from the wider West Midlands conurbation through woodland and topography to its north-east. “Reduction in physical distance between Wombourne and Wolverhampton would still constitute some weakening of the integrity of the Green Belt gap”.





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## Section 5 Landscape and Visual Review

- 5.1 This section considers landscape and visual matters. It provides a baseline review of the site's current condition and evaluates its general sensitivity to development.

### Landscape Character

#### **National Character Area (NCA) 66: Mid Severn Sandstone Plateau<sup>10</sup>**

- 5.2 The site falls within National Character Area 66: Mid Severn Sandstone Plateau. The area is described as a well wooded landscape with “blocks of mixed woodland and old orchards”. Large open fields and weak hedgerow patterns are described as characteristic features. While this gives a general understanding of the higher-level landscape character, it is not a detailed representation of characteristics present within the site and surrounding area.

#### **Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996-2011, Volume 3: Landscape Descriptions (2000)<sup>11</sup>**

- 5.3 The Landscape Descriptions document provides a more extensive evaluation of the regional character of areas within the NCA that lie within Staffordshire. The regional landscape is divided into two Landscape Types (LTs) – Ancient Redlands and Sandstone Estatelands, which are further divided into landscape character areas (LCAs). The site lies within the Sandstone Estatelands LT. Relevant extracts are provided in **Appendix EDP 1**. Key characteristics are:

- *“Settlement is sparse and characterised by expanded hamlets and wayside cottages;*
- *Rolling landscape gives way to flatter land along the river valleys, but there are dominant ridge features with scarp slopes; and*
- *A landscape that appears far more wooded than it is, with prominent positioning of woodlands and the coalescence of mature hedgerow oaks in places.”*

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<sup>10</sup> Natural England (2014), NCA 66: Mid Severn Sandstone Plateau, accessed at <http://publications.naturalengland.org.uk/publication/5001578805198848?category=587130> accessed on 08.11.12

<sup>11</sup> Staffordshire County Council Development Services Department (2000), Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996-2011, Volume 3: Landscape Descriptions, Staffordshire County Council

5.4 The site falls within LCA Sandstone Estate lands: farmland. Relevant extracts are provided in **Appendix EDP 1**. Key characteristics are:

- *“Landscape of intensive arable farming on flat to very gently undulating landform characterised by very sparse scattering of isolated mature oak trees and hedgerows;*
- *Local river courses and canal do not have a high visual impact but their presence is associated with increased tree cover in the valleys; and*
- *Long views out to rising ground.”*

5.5 The Landscape Descriptions provide an overview of the local landscape character. While the site and its immediate context feature some elements described within the character assessment, it is generally too broad to effectively comment on the site’s condition and appearance.

#### **Site Character**

5.6 The above gives an indication of the site’s landscape character context on a regional and national level. With regards to the site itself, the following is an assessment of the site character undertaken by EDP:

- Triangular field which has distinctive boundaries to the east and west but is visually open to the north with a post and wire fence marking the boundary;
- Equestrian land use as a paddock for horses, with grassland and scrub present within the site;
- Predominantly flat, low-lying landscape with slight undulations making the southern part of the site slightly higher than the northern part;
- Well-vegetated western and southern boundary; and
- Strong visual relationship with residential development to the east which has urbanising influence on the site.

5.7 The site lies within landscape parcel LS21 which forms part of the Green Belt to the north of Wombourne. It’s bound by post and wire fencing to the north and forms part of a wider network of irregularly shaped fields and pastures located between Orton Lane to the east and the South Staffordshire Railway Path to the west (as shown on **Figure EDP 5.1**). The site appears to be well-used as an equestrian field and popular for recreation.



**Figure EDP 5.1:** View from PRoW Wombourne 23 looking towards the northern boundary of the site, illustrating the boundary treatment within fields and the dense vegetation along the disused railway line.

- 5.8 Residential dwellings back onto and form the eastern boundary of the site. The north-eastern boundary is formed by shrubs which bound a field to the north-east of the site, which is allocated site 416 for housing development. Several residential properties have created informal access points to the site (as shown on **Figure EDP 5.2**). A public footpath follows the site's eastern boundary. While the majority of the vegetation along this side of the site is ornamental and of limited landscape and habitat value, there are two significant oak trees of note located within residential land (as shown on **Figure EDP 5.3**).



**Figure EDP 5.2:** Informal access to the site from residential properties.





**Figure EDP 5.3:** Oak trees within residential properties form focal points along the site's eastern boundary.

- 5.9 A dense area of vegetation forms the site's boundary to the south. The tree lined South Staffordshire Railway Path lies immediately to the west of the site. The topography is predominantly flat, with undulations visible in the distance to the north and north-east of the site. The site itself slopes slightly from the south to the north, where it becomes level with the railway path.



**Figure EDP 5.4:** Dense vegetation, with mainly mature trees and some understorey shrub planting, forms the site's southern and western boundary.

### **EDP Site Appraisal**

- 5.10 Generally, the site benefits from well-vegetated boundaries to the south and west and is defined by its equestrian land use. However, residential development along Strathmore Crescent to the east of the site has an urbanising influence and detracts from its rural character. Access points from the residential properties among ornamental hedges and fences further detract from the site's rural appearance.
- 5.11 The wider landscape area beyond the settlement edge and the immediate area of residential development forms part of the wider countryside surrounding Wombourne. Characteristic features such as tree and woodland groups and hedgerows form field boundaries and focal points, making the eastern extent of parcel SL21 a moderately sensitive landscape to development, as noted in the Landscape and Sensitivity Study.
- 5.12 In contrast to this, the site generally has no notable landscape features aside from vegetation along its boundaries and is strongly influenced by adjacent development. As a result, the site is considered to be in discordance with the eastern part of landscape parcel SL21 and to exhibit a low to medium sensitivity in landscape terms, which is consistent with the Low to Moderate score of the remainder of parcel SL21 to the west (see **Figure EDP 3.1** in **Section 3**).
- 5.13 While it does not currently form a defensible boundary to the Green Belt, it has potential to create a strong and permanent boundary to the existing settlement given its location, its juxtaposition with the adjacent settlement and allocated site 416, its boundaries and the potential for additional structural landscaping along the northern boundary. As per the Landscape Sensitivity Study, the wider character of the area enables notable landscape features such as tree groups and areas of woodland to *“provide significant boundary features separating urban areas from the surrounding countryside”*.

### **Visual Matters**

- 5.14 A site visit was undertaken in May 2024, to provide site photography and determine the visibility of the site in relation to the surrounding area. This section considers the visual amenity of the site.
- 5.15 From the north, there is no intervening built form or vegetation to screen views to or from the site. As a result, open views are available towards the wider countryside to the north of the site (see **Figure EDP 5.5**).





**Figure EDP 5.5:** View looking north beyond the site's boundary and towards the wider countryside.

- 5.16 From the east, views are limited due to the residential development adjacent to the site. Views are restricted to close-range views as a result of the intervening built form. There is visibility of the site from residential roads adjacent to the site (as shown in **Figure EDP 5.6**).



**Figure EDP 5.6:** Visibility of the site from residential roads, showing the dense boundary vegetation on the site's western boundary.

- 5.17 There are no views of the site beyond Orton Lane due to the extensive tree cover at Ladywell Wood to the east of Orton Lane. Furthermore, due to topographical undulations to the north-east of the site, there is no visibility of the site in long-distance views. Generally, the site would integrate with the settlement boundary and is not easily discernible from further afield.
- 5.18 From the south, visibility of the site is limited due to the extensive area of vegetation surrounding the Railway Café between the site and residential properties along

Bratch Lane. From within the site, tops of residential dwellings can be glimpsed beyond the treeline.

- 5.19 From the west, visibility of the site is restricted due to the flat topography and the extensive tree belt along the western site boundary. Views from the Staffordshire Railway Walk would be screened through the extensive vegetation (as shown in **Figure EDP 5.7**). Furthermore, the railway path is partly within cutting, so that visibility of the site from the footpath is further restricted. Beyond close-range views there would be limited to no visibility of the site.



**Figure EDP 5.7:** View of South Staffordshire Railway Path along western boundary of the site, dense tree cover limits views of the site to glimpsed views of its northern extent through the trees.

- 5.20 The dense belt of vegetation along the site's western boundary is noticeable from further afield. As shown in **Figure EDP 5.8**, It forms a marked dissection of the landscape and screens views of the site.





**Figure EDP 5.8:** View from South Staffordshire Canal looking east towards the site's western boundary, which forms a distinctive line of trees within the landscape.

- 5.21 Generally, the site is visually contained on all sides except from the north. The visual relationship with the residential development to the east defines the site's visual character. From the north, the site appears to sit on the settlement edge due to its close relationship with the adjacent residential development.

### **Summary of Landscape and Visual Review**

- 5.22 From a landscape perspective, there are no landscape features of note located within the site and the site is not subject to a landscape designation. While the site benefits from its distinctive boundary vegetation, it makes a limited overall contribution to the quality of the local landscape. The visual influence from the adjacent residential development to the east has an urbanising effect and detracts from the site's rural appearance. The site is generally visually contained by boundary vegetation and residential development.
- 5.23 Furthermore, land to the north-east of the site has been allocated for development (parcel 416) and would increase the urbanising influence on the site. The site is considered to be in discordance with the Landscape Sensitivity Study and does not contribute to the general quality of the wider landscape parcel SL21. This stems from the sensitivity assessment (necessarily) considering much larger land parcels. The above review shows that a low to medium sensitivity, rather than the moderate identified in the Sensitivity Study, is more appropriate.

- 5.24 The site is visually contained from the east and west. The well vegetated western boundary forms an effective visual buffer to the site (as shown in **Figures EDP 5.7** and **5.8**). The residential development to the east forms a physical barrier which restricts visibility of the site to close-range views.
- 5.25 From a visual perspective, the site reads as part of the settlement edge. Development within the site would have the potential to connect with residential development at Strathmore Crescent. Development within the site would also be able to connect with the allocated site to the north-east. This would integrate new development on the site with existing development so that it is perceived as an extension to the adjacent properties along the settlement edge. Generally, the site forms a small part of the parcel SL21 and development would be a marginal extension into the wider parcel alongside existing development to the east and allocated land to the north-east of the site.
- 5.26 The existing vegetation along the site boundary could be enhanced to strengthen the western boundary and the eastern boundary. New vegetation could be introduced to the north to create a new, clearly defined, permanent settlement edge to the site and the allocated site to the north-east. By increasing the boundary vegetation, views from the wider countryside would benefit from an attractive backdrop. There is also an opportunity to introduce structural planting within the site to link to existing green infrastructure elements outside of the site and add to the local network of landscape and habitat features.
- 5.27 The site provides an opportunity to create a clearly defined permanent settlement edge. There is potential to provide additional vegetation and tree cover to the north of the site and would create a distinctive, defensible edge to the Green Belt designation. This would be in accordance with the local vegetation patterns and would link existing features within the local context.

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## Section 6 Green Belt Review

### Green Belt Review

- 6.1 This section contains an appraisal undertaken by EDP of the site in relation to its contribution to the Green Belt. **Table EDP 6.1** presents the assessment of the wider Green Belt parcel S53C as per the Council’s Green Belt Study and applies the same methodology (provided for clarity at **Appendix EDP 3**) specifically to the site. Whilst an assessment based on EDP’s methodology has been undertaken at **Table EDP 6.2 to 6.5**, it is useful to be able to compare like with like, so that a direct comparison can be made.

**Table EDP 6.1:** Local Authority Green Belt Study Methodology Applied to Parcel and Site.

<b>Assessment of Parcel and Site Contribution to Green Belt Purpose</b>				
<b>GB Purpose and Criteria</b>	<b>Green Belt Study Assessment of Parcel S53C <sup>12</sup></b>	<b>Green Belt Study Rating</b>	<b>EDP Site-Specific Assessment</b>	<b>EDP Site-Specific Rating</b>
<b>P1: Checking the unrestricted sprawl of large built-up areas</b>	Land contains no or very limited urban development and has strong openness. It is close enough to the large built-up area to have some association with it, but also retains some distinction.	<b>Moderate</b>	The site lies adjacent to residential development. While it is open to the north and has views of the open countryside, the site strongly relates to the adjacent development. The site is contained by boundary vegetation to the south and west and by development to the east. New development within the site would read as an extension to the existing residential development.	<b>Moderate to Weak/No Contribution</b>
<b>P2: Preventing the merging of neighbouring towns</b>	Land plays no significant role due to the distance between the West Midlands conurbation and the nearest neighbouring town.	<b>Weak/No Contribution</b>	The site does not play a significant part in preventing the merging or coalescence of towns.	<b>Weak/No Contribution</b>

<sup>12</sup> LUC (2019), South Staffordshire Green Belt Study, South Staffordshire District Council

<b>Assessment of Parcel and Site Contribution to Green Belt Purpose</b>				
<b>GB Purpose and Criteria</b>	<b>Green Belt Study Assessment of Parcel S53C <sup>12</sup></b>	<b>Green Belt Study Rating</b>	<b>EDP Site-Specific Assessment</b>	<b>EDP Site-Specific Rating</b>
<b>P3: Safeguarding the countryside from encroachment</b>	Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	<b>Strong</b>	The adjacent residential development has an urbanising influence on the site. While the site itself is open and has visual connection to the wider countryside to the north, the site relates strongly to the existing development. Its western boundary could form a permanent boundary to the Green Belt.	<b>Weak/No Contribution</b>
<b>P4: Preserve the setting and special character of historic towns</b>	Land does not form part of the setting of a historic town.	<b>Weak/No Contribution</b>	The site does not form part of the setting of a historic town.	<b>Weak/No Contribution</b>
<b>P5: Assist in urban regeneration, by encouraging recycling derelict and other urban land</b>	All parcels are considered to make an equal contribution to this purpose.	<b>Strong</b>	The site is located within the Green Belt and would not encourage the regeneration of existing derelict or urban land.	<b>Strong</b>

6.2 **Table EDP 6.1** highlights the differences between the wider Green Belt parcel and the site's specific contribution to the Green Belt purposes. The site forms a small part of the wider parcel and makes a more limited contribution to the purposes of the Green Belt, particularly those relating to countryside encroachment and potential urban sprawl. The containment of the site on three sides by either development, strong and permanent boundaries or allocated residential development sites, means that it is inherently less 'open' and has a much moderated sensitivity to development than suggested by the Green Belt Study.

6.3 **Table EDP 6.2 to 6.5** evaluate the site's contribution to the purposes of the Green Belt based on EDP's methodology provided in **Appendix EDP 2**. The following tables analyse the site's contribution in detail and provide commentary on its condition.

**Table EDP 6.2:** Review of Contribution to Green Belt Purpose 1.

<b>Purpose 1: To check the unrestricted urban sprawl of large built up areas</b>		
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
Does the site form a contiguous open buffer between the existing settlement edge and the other settlement areas/ wider countryside?	<p>The site is fully located within the South Staffordshire Green Belt. The site lies to the north of the settlement edge of Wombourne, which is identified as one of the largest villages in South Staffordshire by the local plan. While it forms a noticeable gap on the settlement edge, its proximity to residential development on its eastern boundary diminishes this effect. Residential properties at Strathmore Crescent form the site's eastern boundary and are visible from within the site. Additionally, land to the north-east of the site has been allocated for development and would enhance this effect once development is undertaken in this area.</p> <p>While there is no development within the site, the visual connection with the adjacent properties, both existing and proposed, heavily restricts the perceived distinction between the settlement edge and the wider countryside.</p>	<b>Low to Moderate Contribution</b>
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
Are there any defensible boundaries?	<p>Visually, the development site is contained on three sides. The site is open to the north and has no clearly defined boundary to the wider countryside. Residential development forms the eastern boundary and is clearly visible from within the site and limits views due to the intervening built form. Dense vegetation to the south reduces visual connectivity with the settlement edge. Its densely vegetated boundary along the South Staffordshire Railway Path to the west forms a strong boundary to the site. Of these boundaries, the most notable is the western boundary.</p> <p>The overall character of the site is considerably influenced by the adjacent residential development. The site provides an opportunity to create a new, permanent boundary to the current edge of the Green Belt.</p>	<b>Low Contribution</b>

**Table EDP 6.3:** Review of Contribution to Green Belt Purpose 2.

<b>Purpose 2: To prevent neighbouring towns merging into one another</b>		
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
Is the site well associated with the existing settlement edge?	The site is well associated with the settlement edge. It abuts residential development at Strathmore Crescent to the east, and the allocated site north of this.	<b>Low Contribution</b>

<b>Purpose 2: To prevent neighbouring towns merging into one another</b>		
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
What is the distance between the site and the next nearest settlement edge and what is the effect of the perceived and actual intervisibility on potential for coalescence?	<p>The site's northern boundary is approximately 780m to the south of Orton village and 940m to the south-west of the outskirts of Wolverhampton. Due to the intervening vegetation and the undulating landform to the north-west of the site there is no perceived intervisibility with these settlements.</p> <p>Overall, it is considered that extension of the settlement edge into the site would not be easily discernible from the next nearest settlements. Furthermore, there is potential to create a new, permanent settlement boundary to the north of the site which would further limit intervisibility.</p>	<b>No contribution</b>

**Table EDP 6.4:** Review of Contribution to Green Belt Purpose 3.

<b>Purpose 3: To assist in safeguarding the countryside from encroachment</b>		
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
How representative is the site of the key characteristics of the countryside?	<p>The site lies within the Sandstone Estatelands LCT and the Sandstone Estatelands: Farmland LCA as defined by the Landscape Descriptions (see more detail in <b>Section 3</b>).</p> <p>The site lies within the flatter land of the river valley which is described as a characteristic topographical feature of this area. As per the LCT, strategically located areas of woodland and lines of trees, such as the site's western boundary, make the wider landscape appear more wooded than it actually is. The site's views of the wider countryside to the north, with noticeable undulations as there is a slight rise in topography in the background, are also noted as a characteristic feature.</p> <p>The site benefits from a distinctive, vegetated boundary along its western border, which represents a typical character feature of the local landscape character. Trees and woodland groups are strategically positioned throughout the landscape and create an appearance of a well-wooded landscape, despite there being limited tree cover.</p> <p>As a result, it is considered that the site is partially representative of the local landscape character. The proximity to residential development in the east and the strong visual connection with the area of built development detracts from these character features. The western boundary forms a distinctive boundary to the site which would limit development from encroaching upon the wider countryside to the west.</p>	<b>Moderate Contribution</b>

<b>Purpose 3: To assist in safeguarding the countryside from encroachment</b>		
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
What is the influence of the urbanising features?	The site relates physically and visually with Wombourne due to its location near the settlement edge. The development site is urbanised by intervisibility with residential development.	<b>Low Contribution</b>

**Table EDP 6.5:** Review of Contribution to Green Belt Purpose 4.

<b>Purpose 4: To preserve the setting and special character of historic towns</b>		
<b>Application of Criteria</b>	<b>Assessment</b>	<b>Score</b>
Is there potential for intervisibility with an historic core?	<p>The site does not lie within a historic town. There are no listed features in proximity of the site.</p> <p>Wombourne Conservation Area is approximately 890m to the south-east of the site and Staffordshire and Worcestershire Canal Conservation Area approximately 550m to the west, following the Canal's route.</p> <p>It is therefore considered that the development site has no relation to any historic cores.</p>	<b>No contribution</b>

- 6.4 While the wider Green Belt parcel is noted as having a significant contribution to the purposes of the Green Belt, the site itself has limited contribution to checking the unrestricted sprawl of Wombourne, as illustrated by the review above. This is due to its location near existing development and the lack of distinctive boundary features towards the area of residential development. Despite the site having a distinctive and well-vegetated boundary to the south and west, it is considered to have an overall moderate to low contribution to Purpose 1, due to its strong connection with existing development.
- 6.5 The site features a well-vegetated boundary to the west which creates a strong and distinctive buffer between the existing development and the wider countryside to the west. However, the main extent of the site, which lies to the east of this buffer feature, makes little contribution to this purpose. The visual connection to the existing areas of development results in the site having a low contribution to Purpose 2.
- 6.6 The well-established boundary vegetation along the western boundary is representative of the local landscape character and provides precedent for any treatment for the northern boundary. It is a key element of the site which creates a visual and perceptual buffer for the countryside and wider Green Belt parcel to the west. The site is influenced by, and more closely associated with, the adjacent residential development to the east. As a result, the site is considered to have a moderate contribution to Purpose 3.
- 6.7 The site is not within a historic town. Wombourne Conservation area is to the south of the site and the Staffordshire and Worcestershire Canal Conservation Area to the west. The trees along the South Staffordshire Railway Path may be discernible from listed features within the local area to the north and north-west and would potentially form the backdrop of views from the Canal Conservation Area. Beyond this, the site does not appear have



effect on the setting of historic features. As a result, the site is considered to have no contribution to Purpose 4 of the Green Belt designation.

- 6.8 The site appears to be consistent with the Green Belt Study in that “*there is no strong distinction between this relatively flat sub-parcel and the inset settlement edge of Wombourne*”. Areas of woodland and changes in topography to its north-east limit its visual relationship with the wider countryside. Overall, the site forms a small part of the southern extent of Green Belt Parcel S53C Scenario 1 and makes a limited contribution to the open character and purposes of the Green Belt. It is therefore considered to have low to moderate sensitivity to development and result in only **low to moderate harm** to the Green Belt.
- 6.9 This is in contrast to the findings of the Council’s Green Belt study, which considers the site to have a **moderate to high** level of harm if released from the Green Belt. The detailed assessment of the site contained herein has considered landscape and visual matters specific to the site and concludes that it is of a lower sensitivity than stated within the study.
- 6.10 Generally, development of the site is considered to result in a low to moderate harm to the Green Belt designation if released for development. While its release from the Green Belt designation would reduce the overall size of the Green Belt Parcel, it would have limited to no effect on the integrity of the gap between Wombourne and nearby settlements. **Plan EDP 2** illustrates the potential outline of the amended Green Belt boundary in relation to the site. This is due primarily to its perceived distance from nearby settlements, but also the character of the landscape which ensures intervisibility and perceptibility is limited. Furthermore, the allocated site 416 to its north-east would extend beyond the existing settlement. The site provides an opportunity to create a permanent, defensible boundary between the Green Belt and the settlement, including the allocated site to the north-east.

### **Green Belt Compensation (GBC)**

- 6.11 Green Belt Compensation (GBC) ensures that development proposals on former Green Belt land provide compensatory improvements to the quality and accessibility of the Green Belt. It becomes applicable, where it is necessary to release land from the designation for development and provides the opportunity to enhance land remaining within the Green Belt.
- 6.12 Should the site be put forward for development, GBC could be achieved in the form of:
- Enhanced biodiversity;
  - Increased areas of open access land; and
  - Upgraded public rights of way in the local vicinity.

## Section 7

### Summary and Potential Development Response

#### Summary

- 7.1 This report provides a landscape and Green Belt review of the site and evaluates how it contributes to the function of the Green Belt around Wombourne, South Staffordshire, whilst also considering its general sensitivity to development. It considers relevant planning policy, landscape and visual matters and the contribution the site makes to the purposes of the Green Belt as a distinct parcel of land.

#### Landscape Summary

- 7.2 As discussed in **Section 5**, the site is visually contained by vegetation and development on three sides. It is open to the north and has some physical and visual connectivity with the wider countryside in this direction. However, the visual influence from the adjacent residential development has an urbanising effect on the site and detracts from its rural appearance. Land to the north-east of the site has been allocated for development (site 416) and would increase further the urbanising influence on the site.
- 7.3 Furthermore, whilst the site features some typical landscape characteristics for the area, there are no landscape features of note present within the site. While the site does provide a certain level of open character in contrast to the settlement edge, there are features present which limit the site's sensitivity. The site is considered to exhibit a low to medium sensitivity, as opposed to a moderate sensitivity as ascribed within the Council's Sensitivity Study. This is important given that in allocating sites the Council has taken account of the sensitivity ratings ascribed.
- 7.4 In landscape terms, the study area does not lie in or have any association with any designated area. The site presents an opportunity to create a new and permanent settlement edge with a defensible boundary to the wider countryside in the north.

#### Green Belt Summary

- 7.5 As discussed in **Section 6**, the findings of the detailed Green Belt review undertaken demonstrate clearly that the site makes a limited contribution to the overall function of the Green Belt. Applying both the Local Authority's Green Belt Study's methodology and EDP's methodology specifically to the site, the site scores as considerably less important in terms of its contribution to Green Belt functions than is stated in the Green Belt study.
- 7.6 The site is influenced by the adjacent residential development to the east. The existing development has an urbanising effect and detracts from the site's open character. Its western boundary forms a distinctive feature within the landscape that could be enhanced to create a permanent boundary to the wider countryside. Additionally, a new vegetated boundary of similar character to the existing vegetation on the site's boundaries could be

introduced to the north of the site. This would have the potential to create a defensible boundary to the Green Belt and a permanent settlement boundary.

- 7.7 The site is essentially a parcel of land contained on three sides by existing boundary features and has minimal contribution in terms of maintaining the openness of the countryside to the north of Wombourne. Limited visibility of the site from the wider countryside suggests that development would have little to no effect on the visual amenity of the site beyond close-range views.

### **The Potential Development Response**

- 7.8 The below principles demonstrate how development on the site could introduce beneficial features to the local landscape and enhance local landscape character and provide appropriate boundary treatment to the settlement edge and the Green Belt. Opportunities include:

- Retain and enhance existing boundary features;
- Connect with allocated land to the north-east and create permanent boundary to the settlement edge;
- Create new vegetated boundary to the north of the site, using similar species to the existing boundary features and linking to the existing green infrastructure network;
- Retain and enhance the dense vegetation at the southern boundary;
- Provide links into local PRoW network;
- Provide high quality Public Open Space within the site;
- Restrict potential for wide-ranging visual effects through retention and provision of boundary features and careful siting and height of development; and
- Reflect local housing density, whilst providing much needed housing.

### **Overall Summary**

- 7.9 This Landscape and Green Belt Review forms part of a wider suite of documents prepared by the applicant in support of the promotion of the site through the Local Plan process.
- 7.10 The site is not considered as sensitive as described within the Council's Landscape Sensitivity Study. This study necessarily undertakes an assessment of much larger parcels than the site and has to therefore moderate and combine findings when identifying a singular sensitivity rating. This will inevitably 'underplay' or 'overplay' the sensitivity of certain potential development parcels. In this instance it is considered that the study

overplays the rating, applying a moderate sensitivity to what is shown through the detailed appraisal undertaken herein to be a low to medium sensitivity parcel of land.

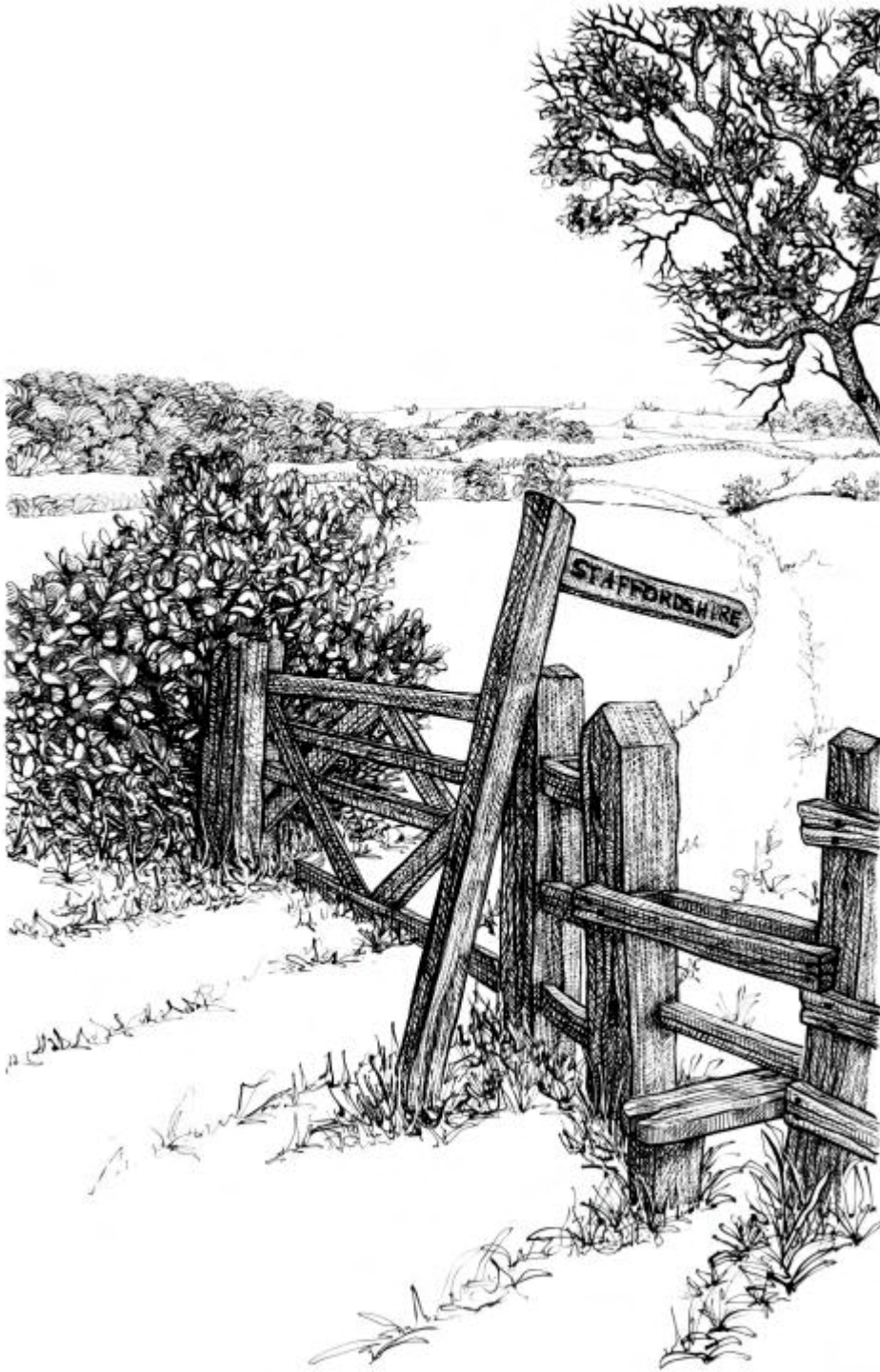
- 7.11 Overall, the site is considered to make a limited contribution to the open character of the wider Green Belt parcel. The site comprises an area of 3ha, which makes up a small area of the whole parcel S53C-S1, which covers an area of 61.85ha. The site does not contribute to a “*strong distinction*” between the wider countryside and the settlement edge, as noted in the Green Belt study. Due to the presence of residential development on its eastern boundary, the site reads as part of the settlement edge. The site’s triangular shape and location between the South Staffordshire Railway Path to the west and residential development in the east reduce its contribution to the open character of the Green Belt.
- 7.12 Due to its small size in relation to the wider Green Belt Parcel, the site’s release from the Green Belt designation would have a very limited impact on the integrity of the Green Belt. The gap between Wombourne and nearby settlements to the north and north-east would remain intact.
- 7.13 There is potential to extend development into the site and form a permanent, new boundary to the settlement edge. Characteristic features, such as a line of trees linking the existing vegetation corridors with each other, could be implemented to form a new defensible boundary to the Green Belt. If considered acceptable for future development, the site offers opportunities to provide GBC measures which would have potential to enhance the quality and accessibility of the local Green Belt land.

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**Appendix EDP 1**  
**Findings of EDP Data Trawl**

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***Planning for Landscape Change:  
Supplementary Planning  
Guidance to the  
Staffordshire and Stoke on Trent  
Structure Plan 1996 – 2011  
Landscape Descriptions***



***Planning for Landscape Change:  
Supplementary Planning Guidance  
to the  
Staffordshire and Stoke on Trent  
Structure Plan, 1996 – 2011***

***Volume 3:  
Landscape Descriptions***

***Staffordshire County Council,  
Development Services Department, 2000***

## **Sandstone estatelands**

In its common form, elsewhere in the Structure Plan area, the woodlands and parklands of traditional rural estates characterise the more intact parts of this rolling lowland landscape type.

It has a wide geographic range in those parts of the county where Triassic sandstones are not obscured by drift deposits. Acid sands and brown earths predominate and, whilst some significant remnants of the original heathlands survive, the major land use is now arable cropping in large hedged or open fields of a regular pattern. Settlement is sparse, and characterised by expanded hamlets and wayside cottages. In the single area in the Staffordshire Plain which represents the basic landscape type the former woodlands and parklands have been almost completely lost.

### ***Visual character***

This is a gently rolling, featureless landscape where the increasing intensification of the arable farming has led to almost complete destruction of the fabric of the landscape, ensuring that all elements are on view. The degradation of this area is continuing, judging by the present state of the hedgerows and stag headed appearance of the remnant hedgerow oaks. Stream corridors in places provide the only intact landcover elements, giving some structure to this simple landscape.

The original vegetation pattern shows through strongly in the remnants of silver birch woodland and heathland species present in the hedgerows. Recent enclosure of the land is indicated by the ordered nature of a planned functional landscape.

Settlement is characterised by a sparsely settled pattern of expanded hamlets and isolated large farms and estate buildings linked by predominantly straight minor roads. Incongruous features such as modern large farm buildings and poorly designed reservoirs are being introduced into the landscape as a result of farm intensification.

### ***Characteristic landscape features***

Silver birch woodlands; well-treed stream corridors; straight roads; intensive arable agriculture in an open remnant field pattern.

### ***Incongruous landscape features***

Hedgerow removal along roadsides; field trees; badly designed farm reservoirs; large modern farm buildings and improved commuter properties; power lines.

### ***Factors critical to landscape character and quality***

The critical factors which currently limit landscape quality are the loss of characteristic landscape features, the poor condition of those features that remain, the relatively poor survival of historic elements that contribute to landscape character, such as field, settlement and road patterns, and the very poor survival of characteristic semi-natural vegetation (i.e. heathland and related habitats, and meres and mosses).

This landscape character type is very sensitive to the impacts of development and land use change.

### ***Potential value of new woodland planting***

Very high. There is a need in particular for the planting of larger woodlands, to restore the landscape structure of this open featureless arable farmland, to screen or direct views away from



inappropriate development, e.g. reservoirs and modern farm buildings, and to reinforce the remnant heathland character of the landscape.

**Potential value of other habitat provision and management**

The following Staffordshire Biodiversity Action Plan Targets are relevant at landscape scale:

Habitat type	Objective or target	Priority
Ancient/ semi-natural broadleaved woodland	maintain and enhance	high
	restore degraded sites	high
	recreate/ regenerate	medium
Ancient/ diverse hedgerows	maintain and manage	medium
	maintain trees	medium
Hedgerows	plant species-rich hedges	lower
Arable field margins	maintain, improve and restore	high
Canals, lakes and ponds	maintain and enhance water bodies and catchments	high
	increase the number of such features	high
Lowland wood pasture and parkland	maintain and safeguard	high
	restore degraded sites	high
Peat bogs	maintain and enhance	high
Reedbeds	maintain and create	high
Rivers and streams	maintain and improve the quality and quantity of water	high
	maintain the quality of all natural existing channel features	high

Further details of these habitat targets can be found in the Staffordshire Biodiversity Action Plan.

**Specific guidelines**

Tree and woodland planting

New planting should tie into existing woodlands or be of sufficiently large scale to be appropriate for the remnant field pattern. Existing tree-lined stream corridors and copses can be consolidated to increase their scale.

Conifers are acceptable in this landscape, but care must be taken with edge treatment. The shape of new woodlands is less important than is fitting them to the existing vegetation pattern, but there are some areas of stronger landform where care should be taken.

## **Sandstone estatelands: farmlands**

This is a variant of the basic landscape type in which traditional landed estates are uncommon. There is little woodland, and very little, if any, of ancient origin.

### ***Visual character***

This is a landscape of intensive arable farming, where hedgerow tree cover of oak and occasional ash is sparse and hedgerows are well trimmed and in decline. Many hedgerows have now been removed to increase field size and this has created an open, smoothly textured landscape with extensive views across it. A gently undulating landform results in the landcover elements being viewed as individual components of the landscape and field pattern showing up from elevated viewpoints.

Woodland cover in this medium to large-scale landscape tends to be small-scale broadleaved and conifer plantations. Visually, woodland edges, stream corridors and trees associated with farm buildings provide localised relief and control views.

### ***Characteristic landscape features***

Well treed stream valleys; small broadleaved copses; intensive arable farming; hedged field pattern; gently undulating landform.

### ***Incongruous landscape features***

Sand and gravel quarrying. Extensive fencing where field pattern is being lost. Improved commuter properties.

### ***Factors critical to landscape character and quality***

The critical factors which currently limit landscape quality are the loss of characteristic landscape features, the poor condition of those features that remain, and the relatively poor survival of characteristic semi-natural vegetation, in particular heathland and related habitats.

### ***Potential value of woodland planting.***

High. There is a particular need for the planting of larger woodlands, to restore a landcover structure to a landscape that has deteriorated due to intensive arable farming.

### **Potential value of other habitat provision and management**

The following Staffordshire Biodiversity Action Plan Targets are relevant at landscape scale:

<b>Habitat type</b>	<b>Objective or target</b>	<b>Priority</b>
Ancient/diverse hedgerows	maintain and manage	very high
	maintain trees	very high
Hedgerows	plant species-rich hedges	lower
Arable field margins	maintain, improve and restore	high
Canals, lakes and ponds	maintain and enhance water bodies and catchments	medium
	increase the number of such features	medium
Lowland wet grassland	maintain and enhance existing areas	medium
	restore degraded areas	medium
	create new areas	lower
Lowland wood pasture and parkland	maintain and safeguard	high
	restore degraded sites	high
Reedbeds	maintain and create	medium
Rivers and streams	maintain and improve the quality and quantity of water	high
	maintain the quality of all natural existing channel features	high
Unimproved neutral grassland	maintain and safeguard existing areas	high
	restore	medium
	link adjacent sites through habitat creation	medium
	create/re-create new areas	lower

Further details of these habitat targets can be found in the Staffordshire Biodiversity Action Plan.

### ***Specific guidelines***

#### Tree and woodland planting

The existing field pattern needs reinforcing by additional hedgerow replanting with hedgerow trees. New woodlands should be designed to the existing remnant - although visually important - field pattern. The scale of planting can vary from small scale adjacent to existing vegetation to large scale planting of field size and above. A species mix of both conifers and broadleaves is acceptable provided care is taken with design of edges.

## **Appendix EDP 2**

### **EDP Green Belt Assessment Methodology and Criteria**

#### **Review Criteria**

- A2.1 As noted in the NPPF the Green Belt serves five purposes. For each NPPF purpose, criteria have been determined that allow for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the function of the Green Belt in this location. The criteria for each purpose is described in more detail below.

#### ***Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas***

- A2.2 This is a test that considers whether the site is able to prohibit sprawl. Commonly, sprawl is ribbon development but may also be piecemeal development in isolated areas or along settlement edges. A site may already have been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of openness, this being whether or not there is a sense that the site within the Green Belt is still open and absent of development.
- A2.3 Sprawl may also be discouraged by defensible boundaries to existing settlements that are either natural (e.g. topography, woodland or water course) or man-made features (e.g. as a main road, main railway line, or settlement edge). These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries may contribute towards greater openness.

#### ***Purpose 2: To Prevent Neighbouring Towns Merging into One Another***

- A2.4 The consideration is whether or not the settlement growth could lead to merging with another town. The wording of the NPPF refers to 'towns', but often the Green Belt affects a considerably smaller geographical scale, in which it is more relevant to consider the potential for merging of neighbouring settlement edges to distinct settlement areas that might be defined as towns.
- A2.5 In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in either plan view or 'on the ground' by intervening natural or man-made features.
- A2.6 The interpretation of 'merging', in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements, the range can be much smaller with distances reducing to as little as 100m in some cases. It is of note that susceptibility to 'merging' depends on distance between two settlements, and each situation needs to be reviewed in relation to the local landscape and visual context.

***Purpose 3: To Assist in Safeguarding the Countryside from Encroachment***

- A2.7 In terms of Green Belt, the 'countryside' is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space and access to it, etc. Countryside is likely to be undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain man-made features such as historic landmarks, properties, mineral extraction or larger areas of settlement.
- A2.8 This assessment is based on the key landscape characteristics of the site and its surroundings, as well as the visual context as described above in **Section 2**. Consideration is also given to the extent of recreational access provided to the Green Belt through the site.
- A2.9 Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative 'value' element to be applied to landscapes.
- A2.10 The matter of 'encroachment' is also a judgement that considers whether or not development (such as built form along the edge or within it, pylons and high voltage overhead cables, sub-stations, quarrying and urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or influences it, and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site that has limited or no urbanising influences has a stronger role in safeguarding countryside.
- A2.11 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, it is large man-made features such as dual carriageways, or motorways; natural features might include woodland, large water bodies, such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.
- A2.12 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded where possible or integrated sensitively into design proposals.



***Purpose 4: To Preserve the Setting and Special Character of Historic Towns***

A2.13 The subject of setting and special character in the context of historic towns should be examined on a site by site basis, by specialist heritage consultants. However, the Archaeology and Heritage Assessment allows the assessment to acknowledge that historic cores do exist as indicated by the Royal Tunbridge Wells and Pembury Conservation Areas.

***Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land***

A2.14 This purpose falls outside the scope of this report and has not been tested.

**Review Scoring**

A2.15 EDP has developed a methodology for Green Belt Reviews, which is based on landscape and visual assessment methodology with regard to the purposes of the Green Belt and our experience of Green Belt reviews.

A2.16 The site is scored against the criteria for each purpose as shown below, with criteria weighted as no, low, moderate or strong contribution towards meeting the purposes of the Green Belt. Occasionally, scores are spread if part of the site makes differing performances. This ensures that, whilst the NPPF does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the Green Belt or retained within it.

<b>NPPF Green Belt Purpose</b>	<b>Criteria</b>	<b>Application of Criteria to Site and Criteria Weighting:</b>  <b>No Contribution;</b>  <ul style="list-style-type: none"> <li>• <b>Low Contribution;</b></li> <li>• <b>Medium Contribution; and</b></li> <li>• <b>Strong Contribution.</b></li> </ul>
<b>Purpose 1 To check the unrestricted sprawl of large built-up areas</b>	<ul style="list-style-type: none"> <li>• Creates a clear, recognisable distinction between urban fringe and open countryside.</li> </ul>	<p>Does the site form an open buffer between the existing settlement edge and the wider countryside?</p> <ul style="list-style-type: none"> <li>a. Yes, the site is free of development and associated influences and strongly contributes to the openness of the Green Belt (Strong);</li> <li>b. There is an absence of development within the site, but it is overlooked by adjacent/nearby development (Moderate);</li> <li>c. No, the site contains development and/or does not clearly define a distinction between the settlement edge and the open countryside (Low); and</li> <li>d. Land use of the site results in it forming neither countryside or urban (no contribution).</li> </ul>

<b>NPPF Green Belt Purpose</b>	<b>Criteria</b>	<b>Application of Criteria to Site and Criteria Weighting:</b>  <b>No Contribution;</b>  <ul style="list-style-type: none"> <li>• <b>Low Contribution;</b></li> <li>• <b>Medium Contribution; and</b></li> <li>• <b>Strong Contribution.</b></li> </ul>
	<ul style="list-style-type: none"> <li>• Defensible boundaries have a role in limiting unrestricted sprawl as they create the boundaries to Green Belt parcels. These may be within the site or form part of its boundary; and</li> <li>• Such boundaries can be permanent, such as roads, steep topography, woodland or require additional reinforcement such as hedgerows, tree belts, streams. Fences do not form defensible boundaries. Incomplete or low boundaries may result in part/all of a site making a greater contribution to the openness of the Green Belt.</li> </ul>	<p>Does the site have a defensible boundary which can prevent sprawl?</p> <ul style="list-style-type: none"> <li>a. The site does not have defensible boundaries and maintains openness with the wider Green Belt (strong);</li> <li>b. The site has some defensible boundary/boundaries and maintains openness in some directions. Additional reinforcement needed (Moderate);</li> <li>c. The site has some permanent boundaries such as roads/railways/rivers/high ground and partially defensible boundaries, some of which do not require additional reinforcement (Low); and</li> <li>d. The site has permanent defensible boundaries that would immediately prevent sprawl (no contribution).</li> </ul>
<b>Purpose 2 To prevent neighbouring towns merging into one another</b>	<ul style="list-style-type: none"> <li>• Settlements maintain a recognisable edge; and</li> <li>• The extent to which the site forms a logical fit with the settlement or, is perceived as an extension that could erode openness.</li> </ul>	<p>Is the site well associated with the existing settlement edge?</p> <ul style="list-style-type: none"> <li>a. The site forms the gap between two settlement edges (strong);</li> <li>b. The site abuts two settlement boundaries and therefore forms part of an indent (moderate);</li> <li>c. The site abuts one settlement boundary but is not divorced from it (low); and</li> <li>d. The site is clearly separated from the settlement boundary and would not undermine the sense of openness (no contribution).</li> </ul>

<b>NPPF Green Belt Purpose</b>	<b>Criteria</b>	<b>Application of Criteria to Site and Criteria Weighting:</b>  <b>No Contribution;</b>  <ul style="list-style-type: none"> <li>• <b>Low Contribution;</b></li> <li>• <b>Medium Contribution; and</b></li> <li>• <b>Strong Contribution.</b></li> </ul>
	<ul style="list-style-type: none"> <li>• Prevent loss or noticeable reduction in distance between towns/settlement edges; this may also be affected by agricultural land use or topography. A larger distance or more prominent topographical change would be better capable of accommodating change than a narrow gap; and</li> <li>• The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent merging.</li> </ul>	<p>Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility on potential for coalescence?</p> <ol style="list-style-type: none"> <li>a. Immediate and clear intervisibility with next nearest settlement edge (strong);</li> <li>b. Partial intervisibility with next nearest settlement edges (moderate);</li> <li>c. Limited intervisibility with next nearest settlement edges (low); and</li> <li>d. No intervisibility with next nearest settlement edges (no contribution).</li> </ol>
<b>Purpose 3 To assist in safeguarding the countryside from encroachment</b>	<ul style="list-style-type: none"> <li>• The countryside comprises 'key characteristics' which define the landscape and the way it is perceived, both visually and physically.</li> </ul>	<p>To what extent does the site represent the key characteristics of the countryside?</p> <ol style="list-style-type: none"> <li>a. The site is highly representative of host landscape character area/type; does not contain landscape detractors (strong);</li> <li>b. The site is partially representative of host landscape character area/type; there are some landscape detractors (moderate);</li> <li>c. The site has a low representation of characteristics; many landscape detractors (low); and</li> <li>d. No representation of landscape character area/type; high number detractors that weaken landscape character considerably (no contribution).</li> </ol>

<b>NPPF Green Belt Purpose</b>	<b>Criteria</b>	<b>Application of Criteria to Site and Criteria Weighting:</b>  <b>No Contribution;</b>  <ul style="list-style-type: none"> <li>• <b>Low Contribution;</b></li> <li>• <b>Medium Contribution; and</b></li> <li>• <b>Strong Contribution.</b></li> </ul>
	<ul style="list-style-type: none"> <li>• Encroachment: features such as settlement edge, speed signage and street lighting affect the extent to which the countryside changes from rural to urban.</li> </ul>	<p>To what extent is the site urbanised, either by on-site or off-site features?</p> <ul style="list-style-type: none"> <li>a. There are no urbanising features within the site or directly influencing it (strong);</li> <li>b. There are several off-site urbanising features affecting the site (moderate);</li> <li>c. There are many off-site urbanising features affecting the site (low); and</li> <li>d. The site is distinct due to its urbanising features (no contribution).</li> </ul>
<b>Purpose 4 To preserve the setting and special character of historic towns</b>	<ul style="list-style-type: none"> <li>• The proximity of the site to a heritage designation relates to the historic character of a settlement and whether or not its openness in Green Belt terms is a consideration.</li> </ul>	<p>What is the spatial and visual relationship between the site and the historic core of the nearest towns?</p> <ul style="list-style-type: none"> <li>a. The site is wholly within an historic character area/heritage-related designation (strong);</li> <li>b. The site is adjacent to an historic character area/heritage-related designation (moderate);</li> <li>c. The site has partial intervisibility with an historic character area/heritage-related designation its openness may be a consideration (low); and</li> <li>d. The site does not share a boundary with an historic character area/heritage-related designation and/or there is no intervisibility (no contribution).</li> </ul>



<b>NPPF Green Belt Purpose</b>	<b>Criteria</b>	<b>Application of Criteria to Site and Criteria Weighting:</b>  <b>No Contribution;</b> <ul style="list-style-type: none"><li>• <b>Low Contribution;</b></li><li>• <b>Medium Contribution; and</b></li><li>• <b>Strong Contribution.</b></li></ul>
<b>Purpose 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</b>	Not tested.	Not tested.

**Appendix EDP 3**  
**Green Belt Study Assessment Methodology and Criteria**

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# South Staffordshire Green Belt Study

Stage 1 and 2 Report  
Prepared by LUC  
July 2019

**Project Title:** Green Belt Study – Stage 1 and Stage 2 Report

**Client:** South Staffordshire Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.0	18/03/2019	Draft Stage 1 and 2 Report	Richard Swann Helen Kent Natalie Collins	Helen Kent	Sarah Young
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[www.landuse.co.uk](http://www.landuse.co.uk)

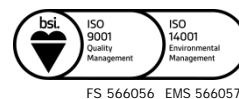
## South Staffordshire Green Belt Study

Stage 1 and 2 Report  
Prepared by LUC  
July 2019

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# Part B: Stage 1 Methodology and Findings



## 4 Stage 1 Methodology

### Introduction

- 4.1 The following chapter sets out the methodology for the Stage 1 Green Belt Assessment. The primary aim of the Stage 1 assessment was to establish the variation in the contribution of land to achieving the Green Belt purposes as defined by the NPPF. Based on the assessment criteria outlined below, a strategic review of the contribution of all Green Belt land within the Council areas to each of the five Green Belt purposes was undertaken. This drew out spatial variations in the contribution of Green Belt land to each Green Belt purpose.

### Strategic Assessment Process

- 4.2 Prior to any detailed assessment work, an initial visit was made to the area, to gain an overview of the spatial relationships between the settlements and the countryside in South Staffordshire.
- 4.3 The first main step then involved identifying any Green Belt locations where sufficient urbanising development has occurred which has had a significant impact on Green Belt openness (as defined in **Chapter 3** above). Distinctions were made between development which is rural enough in character, or small enough in size, or low enough in density, not to affect to its designation as Green Belt.
- 4.4 The second step assessed the fragility of gaps between the settlements identified in **Chapter 3** as 'towns' under Green Belt Purpose 2.
- 4.5 The assessment then proceeded on a settlement by settlement basis, starting with the largest areas of development – i.e. in the first instance the Wolverhampton-Walsall conurbation – through to the smaller inset<sup>43</sup> villages. If any significant areas of washed-over<sup>44</sup> urbanising development were identified in the initial stage, these too formed a focus for analysis. Recognising the common factors that influence the role of Green Belt land in the relationship between urban settlement and countryside (as described in **Paragraph 4.3** above), the analysis:
- assessed the strength of relationship between the Green Belt and the urban area, considering the extent and form of development, land use characteristics and separating and connecting features;
  - identified changes in the strength of relationship between settlement and countryside, again considering the extent and form of development, land use characteristics and separating and connecting features; and
  - considered how these spatial relationships affect contribution to each of the Green Belt purposes, and mapped lines to mark these changes.
- 4.6 The analysis progressed outwards from each settlement until it was determined that land:
- ceases to play a significant role in preventing sprawl of a large built-up area;
  - either makes a consistent contribution to settlement separation, or makes no contribution to this purpose;
  - is strongly distinct from urban settlement and has a strong relationship with the wider countryside; and
  - makes no contribution to the setting or special character of a historic town.

---

<sup>43</sup> 'Inset' development is development that is surrounded by Green Belt land but is not itself located within the Green Belt designation.

<sup>44</sup> Development 'washed-over' by the Green Belt is development that is located within the Green Belt designation.

## Criteria for Assessment of Green Belt Contribution

- 4.7 To draw out clear variations in contribution to each Green Belt purpose the three point scale set out in **Table 4.1** was used.

**Table 4.1: Green Belt Contribution Ratings**

<b>Strong Contribution</b>	Green Belt performs well against the purpose.
<b>Moderate Contribution</b>	Green Belt performs moderately well against the purpose.
<b>Weak/No Contribution</b>	Green Belt makes weak or no contribution to the purpose.

### Purpose 1 Assessment Criteria

- 4.8 The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred and its relationship with existing large built-up area(s). **Figure 3.1** indicates which settlements lie within large built-up areas. All of the development forms noted in the RTP1 note (see **para 3.17**) have been considered when judging the extent to which sprawl has already occurred. Assumptions about the extent and form of future development which have not been permitted cannot be made. Sprawl includes any built structure that has an impact on openness and/or has an urbanising influence. It does not include development which is classed as appropriate development, or not inappropriate development in the Green Belt (as defined in paras 143-147 of the NPPF<sup>45</sup>).
- 4.9 To contribute to Purpose 1, land must lie adjacent to, or in close proximity to, a large built-up area, and must retain a degree of openness that distinguishes it from the urban area. Land that has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development or the strength of physical separation from the wider countryside, makes a weaker contribution to this purpose. Vice versa, land which is adjacent to the urban edge but which, as a result of its openness and relationship with countryside, is distinct from it makes a stronger contribution.
- 4.10 Land which is more clearly associated with a settlement that is not a large built-up area can be considered to make no direct contribution to Purpose 1.
- 4.11 In summary, key questions asked in assessing Purpose 1, the prevention of sprawl of large, built-up areas, include:
- Does the land lie in, adjacent to, or in close proximity to the large built-up area?
  - To what extent is the land open or does it contain existing urban development?
  - Does the land relate sufficiently to a large built-up area for development within it to be associated with that settlement or vice versa?
  - Does land have a strong enough relationship with the large built-up area, and a weak enough relationship with other Green Belt land, for development to be regarded more as infill than sprawl?
  - What is the degree of containment by existing built development or other features (e.g. by landform)?

<sup>45</sup> This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404. Applying the findings of this case, appropriate development in the Green Belt cannot be contrary to either the first or third Green Belt purpose and should be excluded from the assessments as 'urbanising features' as it is cannot be "urban sprawl" and cannot have an "urbanising influence".

4.12 **Table 4.2** summarises the criteria that were used for the assessment of Purpose 1.

**Table 4.2: Purpose 1 assessment criteria**

<b>Purpose 1: Check the unrestricted sprawl of large built-up areas</b>	
<p>Development/land-use: where there is less existing development, the Green Belt makes a stronger contribution.</p> <p>Location: land closer to the large, built-up area generally makes a stronger contribution.</p> <p>Separating features: land that has a stronger relationship with the countryside than the large built-up area makes a stronger contribution.</p> <p>Connecting features: where there are no connecting features between the large built-up area and the countryside, land makes a stronger contribution.</p>	
<b>Strong Contribution</b>	Land adjacent or close to the large built-up area that contains no or very limited urban development and has strong openness. It retains a relatively strong relationship with the wider countryside.
<b>Moderate Contribution</b>	Land adjacent or close to the large built-up area that contains some urban development and/or is to an extent contained by urban development, but retains openness and some relationship with the wider countryside.
<b>Weak/No Contribution</b>	<p>Land adjacent or close to the large built-up area that is already fully urbanised; or</p> <p>land that is too contained by development to have any relationship with the wider countryside; or</p> <p>land that is sufficiently separated or distant from a large built-up area for there to be no significant potential for urban sprawl from the large built-up area.</p>

**Purpose 2 assessment criteria**

- 4.13 The role land plays in preventing the merging of towns is more than a product of the size of the gap between towns. The assessment considered both the physical and visual role that Green Belt land plays in preventing the merging of settlements. This approach accords with PAS guidance which states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. Settlements identified as towns are listed in **Table 3.1** and indicated on **Figure 3.2**.
- 4.14 Land that is juxtaposed between towns makes a contribution to this purpose, and the stronger the relationship between the towns – the more fragile the gap – the stronger the contribution of any intervening open land. Physical proximity was the initial consideration, but land that lacks a strong sense of openness, due to the extent of existing development that has occurred, makes a weaker contribution. This includes land that has a stronger relationship with an urban area than with countryside, due to extent of containment by development, dominance of development within an adjacent inset area, or containment by physical landscape elements. However, where settlements are very close, a judgement was made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns, i.e. the characteristics of the open land relate more to the urban areas themselves than to the open land in between. Where this is the case, the contribution to Purpose 2 may be reduced.
- 4.15 Both built and natural landscape elements can act to either decrease or increase perceived separation, for example intervisibility, a direct connecting road or rail link or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation. Smaller inset settlements also reduce the amount of countryside between towns, particularly as perceived from connecting roads.



- 4.16 In summary, key questions asked in assessing Purpose 2, preventing the coalescence of towns, include:
- Does the land lie directly between two settlements being considered under Purpose 2?
  - How far apart are the towns being considered?
  - Is there strong intervisibility between the towns?
  - How do the gaps between smaller settlements affect the perceived gaps between towns?
  - Are there any separating features between the towns including e.g. hills, woodland blocks etc. which increase the sense of separation between the settlements?
  - Are there any connecting features between the towns including e.g. roads, railways which reduce the sense of separation between the settlements?
  - What is the overall fragility/ robustness of the gap taking the above into account?

4.17 **Table 4.3** summarises the criteria that were used for the assessment of Purpose 2 in the study.

**Table 4.3: Purpose 2 assessment criteria**

<b>Purpose 2: Prevent neighbouring towns from merging</b>	
<p>Development/land-use: less developed land will make a stronger contribution – a ‘gap’ which contains a significant amount of development is likely to be weaker than one in which the distinction between settlement and countryside is clearer.</p> <p>Location: land juxtaposed between towns makes a stronger contribution.</p> <p>Size: where the gap between settlements is wide, the Green Belt makes a weaker contribution.</p> <p>Separating features: the presence of physical features that separate towns such as substantial watercourses, landform e.g. hills, or forested areas, can compensate for a narrower gap (in terms of distance). However loss of such features would consequently have a greater adverse impact on settlement separation.</p> <p>Connecting features: where physical features strengthen the relationship between towns, e.g. where they are directly linked by a major road or have a strong visual connection, or where smaller urban settlements lie in between, the gap can be considered more fragile, and the Green Belt consequently makes a greater contribution to maintaining separation.</p>	
<b>Strong Contribution</b>	Land that forms a narrow gap between towns, essential to maintaining a sense of separation between them.
<b>Moderate Contribution</b>	<p>Land that lies between towns which are near each other, but where there is sufficient physical or visual separation for each town to retain its own distinct setting; or</p> <p>land that retains separation between parts of two towns, but where development elsewhere has significantly compromised the sense of distinction between the two settlements.</p>
<b>Weak/No Contribution</b>	<p>Land which is not located within a gap between towns; or</p> <p>land which plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns; or</p> <p>land which plays no significant role due to the extent of development; or</p> <p>land forming a gap that is too narrow to create any clear distinction between towns (i.e. a sense of leaving one and arriving in another).</p>

### Purpose 3 assessment criteria

- 4.18 The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of:
- i) the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising uses; and
  - ii) the extent to which land physically relates to the adjacent settlement and to the wider countryside (i.e. whether it has a stronger relationship to urban area than with the wider countryside).
- 4.19 Physical landscape elements (or a lack of them), may strengthen or weaken the relationship between settlement and adjacent countryside, but there needs to be significant urban influence from adjacent land, and a degree of physical containment to limit contribution to this purpose. Intervisibility between open land and an urban area is not in itself enough to constitute a significant urban influence: the urban area would need to be a dominating influence either through: i) the scale of development; or ii) the degree of containment of the open land by development. Also the presence of landscape elements (e.g. landform or woodland) that strongly contain an area, and consequently separate it from the wider countryside, may give land a strong relationship with a visible urban area even if buildings are not particularly dominant.
- 4.20 It is important to maintain a distinction between contribution to Purpose 3 and contribution to landscape/visual character. For example, land that displays a strong landscape character in terms of sense of tranquillity, good management practices or high scenic value, or which has public recreational value, may have high sensitivity from a landscape/visual point of view. However the same land in Green Belt terms may well make as equal a contribution to Purpose 3 as land at the urban edge which retains its openness and a relationship with the wider countryside.
- 4.21 In summary, key questions asked in assessing Purpose 3: safeguarding the countryside from encroachment include:
- To what extent does the land exhibit the characteristics of the countryside – i.e. an absence of built or otherwise urbanising development?
  - Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?
  - Does land relate more strongly to the settlement(s), or to the wider countryside?
- 4.22 **Table 4.4** summarises the criteria that were used for the assessment of Purpose 3 in the study.

**Table 4.4: Purpose 3 assessment criteria**

Purpose 3: Assist in safeguarding the countryside from encroachment	
Development/land-use: where there is less urbanising land use and more openness, land makes a stronger contribution.	
Separating features: land that has a stronger relationship with countryside than with the settlement makes a stronger contribution.	
Connecting features: an absence of physical features to link settlement and countryside means that land makes a stronger contribution.	
<b>Strong Contribution</b>	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms <sup>46</sup> ) and which does not have a stronger relationship with the urban area than with the wider countryside.

<sup>46</sup> This does not include development which is deemed to be appropriate, or not inappropriate within the Green Belt as set out in Paragraphs 145 and 146 of the NPPF.

<b>Moderate Contribution</b>	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms), and which has a stronger relationship with the urban area than with the wider countryside (i.e. it is contained in some way by urbanising and or other features); or  Land which retains some degree of openness and has some relationship with the wider countryside but which is compromised by urbanising development or uses within it.
<b>Weak/No Contribution</b>	Land that contains urbanising development of a scale, density or form that significantly compromises openness; or  Land which is too influenced and contained by urban development to retain any significant relationship with the wider countryside.

#### Purpose 4 assessment criteria

- 4.23 The connection between a historic town's historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement. It should also be noted that the connection is not always visual, for example where the wider open countryside surrounding a historic town contributes to its setting and special character collectively as a whole.
- 4.24 In summary, key questions asked in assessing Purpose 4 include:
- What is the relationship of the land with the historic town?
  - Does the land form part of the setting and/or special character of an historic town?
  - What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?
- 4.25 Consideration of the setting of individual heritage assets extends only to their contribution to the character and legibility of the historic towns.
- 4.26 **Table 4.5** summarises the criteria that were used for the assessment of Purpose 4 in the study.

**Table 4.5: Purpose 4 assessment criteria**

Purpose 4: Preserve the setting and special character of historic towns	
Development/land-use: less developed land makes a stronger contribution.	
Location: an area that contains key characteristics, or important in views to or from them, makes a stronger contribution.	
Separating features: land that lacks physical features to create separation from a historic town – i.e. land where the Green Belt provides a visual setting for the historic town – makes a stronger contribution.	
Connecting features: where there is stronger relationship between historic town and countryside the contribution to this purpose is stronger.	
<b>Strong Contribution</b>	The land and its openness makes a key contribution to the characteristics identified as contributing to a historic town's setting or special character.
<b>Moderate Contribution</b>	The land and its openness makes some contribution to the characteristics identified as contributing to a historic town's setting or special character.
<b>Weak/No Contribution</b>	Land forms little or no part of the setting of an historic town and does not contribute to its special character.

### Purpose 5 assessment criteria

- 4.28 As set out in **Chapter 3** above, it was not considered possible to reasonably differentiate between the contribution of different parts of the Green Belt to Purpose 5. Given the historic and continued strategy to recycle brownfield land in the adjoining Black Country authorities, as set out in the Black Country Core Strategy and targeted through identified regeneration areas, the significant area of brownfield land within the Black Country, the presence of brownfield land within South Staffordshire, and the location of South Staffordshire and the Black Country authorities within the same Housing Market Area, it is concluded that all Green Belt land within South Staffordshire makes a strong contribution to urban regeneration by encouraging the recycling of derelict and other urban land.

## Stage 1 Strategic Assessment Outputs

### Analysis of variations in contribution to Green Belt purposes

- 4.29 The Stage 1 outputs are discussed in **Chapter 5**. Maps illustrating the assessed variations in contribution for each purpose across South Staffordshire are also set out in **Chapter 5**. Each map is accompanied by supporting text describing the pattern of variation and the reasoning behind its definition.
- 4.30 By combining the lines marking variations in contribution to Green Belt purposes, a list of land parcels was generated, each of which has a reference number and a rating for contribution to each purpose. The parcels are the product of the assessment rather than a precursor to it. The reasoning behind this approach was to draw out variations in contribution to inform the site-specific assessments undertaken at Stage 2, avoiding broad variations in contribution within prematurely and more arbitrarily defined parcels. Avoiding significant variations in contribution within defined parcels prevents the need for ratings to be generalised to reflect the strongest or average level of contribution within a defined area.

## **Plans**

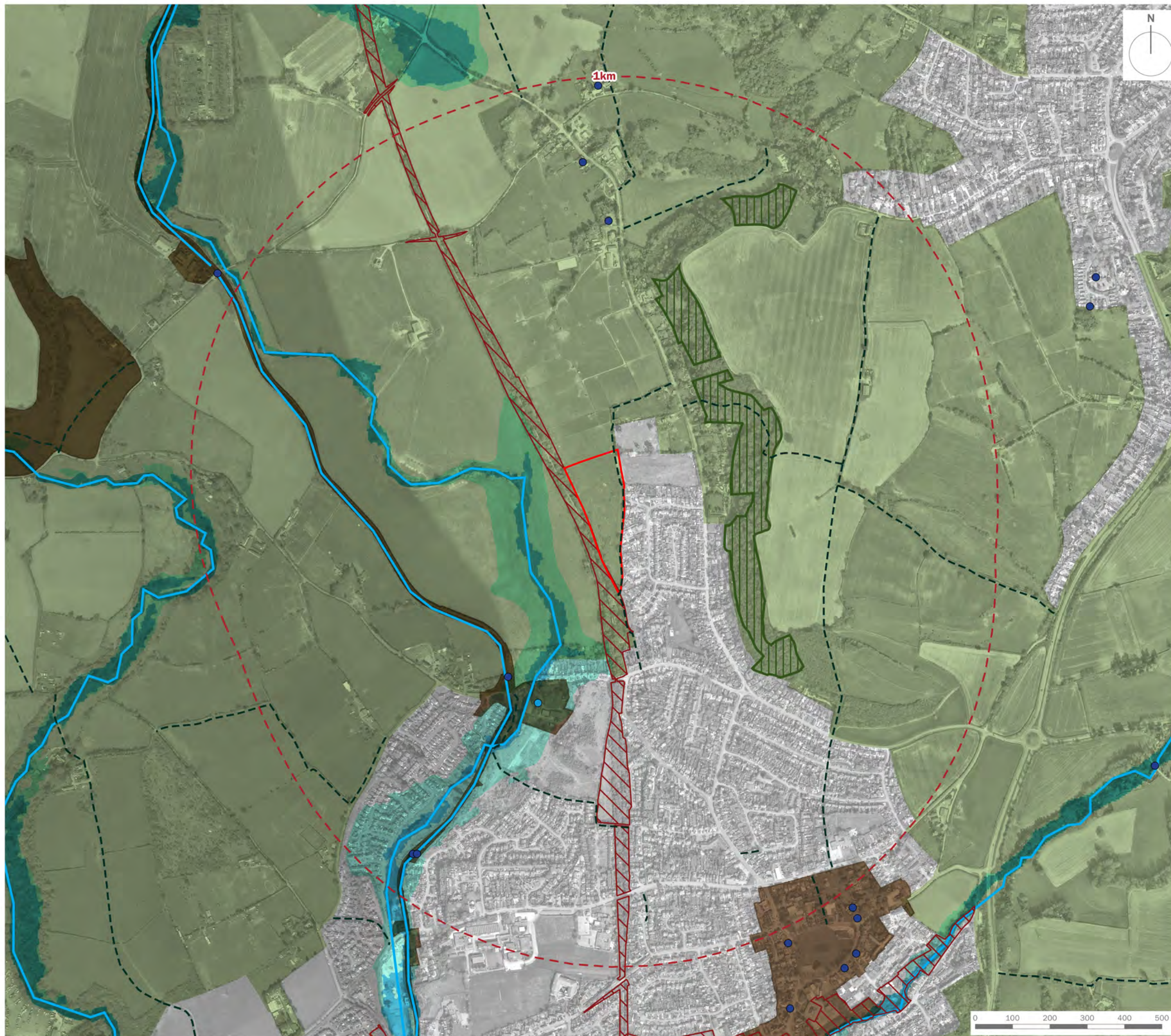
**Plan EDP 1**      Site Context and Designations  
(edp7419\_d001b 10 December 2021 JTF/LTi)

**Plan EDP 2**      Green Belt Context  
(edp7419\_d002 10 December 2021 SW/LTi)



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- Site Boundary
  - 1km Detailed Study Area
  - Green Belt
  - Public Rights of Way (PRoW)
  - Water Courses
  - Local Nature Reserves
  - Conservation Areas
- Listed Buildings
- Grade II\*
  - Grade II
- Ancient Woodland
  - Flood Zone 2 (Environment Agency)
  - Flood Zone 3 (Environment Agency)

client  
**Bellway Homes Ltd**

project title  
**Land at Wombourne**

drawing title  
**Plan EDP 1: Site Context and Designations**





date	10 DECEMBER 2021	drawn by	JTF
drawing number	edp7419_d001b	checked	LTI
scale	1:10,000 @ A3	QA	RB



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-  Potential Green Belt Boundary
-  Existing Green Belt Boundary
-  Allocation 416
-  Site 708 (as defined in the South Staffordshire Council SHELAA)

client  
**Bellway Homes Ltd**

project title  
**Land at Wombourne**

drawing title  
**Plan EDP 2: Green Belt Context**

date **10 DECEMBER 2021** drawn by **SW**  
drawing number **edp7419\_d002** checked **LTI**  
scale **1:5,000 @ A3** QA **GY**





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## **Appendix 7: Design and Access Statement**



*Land to the west of Orton Lane*

# WOMBOURNE

DESIGN & ACCESS STATEMENT  
November 2023





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## Foreword

We are delighted to present this Design and Access Statement setting out our vision and proposals on land to the west of Orton Lane, Wombourne.

This Site is being promoted by Bellway Homes, a recognised five star housebuilder who take pride in their commitment to delivering exceptional quality as standard to customers. They have a consistent track-record of delivering high quality homes across the UK and their aim is not just to build new houses, but to create attractive and sustainable communities that leave a positive legacy for residents and the wider society.

The overarching Vision for land to the west of Orton Lane, Wombourne is to deliver a high-quality, locally distinguishable and sustainable addition to the village where people will wish to live. The proposed development will provide an opportunity to deliver much needed new housing for the town, enhancing and complementing the existing settlement edge. The proposals seek to create a strong and positive legacy for the village. The Site has the capacity to deliver 32 new homes.

Prepared by:



For:



In consultation with:



# 1

### Introduction

An overall introduction to Wombourne, the Site and development proposals, including overarching objectives and Vision.



# 2

### Context Analysis

A summary of all the contextual analysis carried out to ensure an informed approach to the design development of the Site.



# 3

### Design Evolution

A detailed constraints and opportunities plan, summarising all the findings of the site assessment work, and a concept plan for the Site.



# 4

### The Masterplan

Presentation of the proposed Site Layout and the design principles and strategies adopted to ensure a robust development proposal.



# 5

### Conclusion

A summary of the key benefits of the proposal and its merit as the next logical location for new development in Wombourne.

Introduction

Context Analysis

Design Evolution

The Masterplan

Conclusion



# 1

## Introduction

### Place

Wombourne is a village and civil parish located in South Staffordshire. In the 2011 Census the population was listed as 14,157.

The village is located 4 miles south-west of Wolverhampton. Dudley is located approximately 6 miles to the south-east Wombourne, and Birmingham city centre is approximately 13 miles to the south-east. The Staffordshire and Worcestershire Canal runs north-south along the western side of the village. Wombourne benefits from twice-per hour bus service to Wolverhampton.

The village remained quite small until the mid 20th century, when it underwent a period of growth, including the construction of several hundred council houses by Wolverhampton council and the absorption of the hamlets of Giggetty, Blakeley, Ounsdale and the Bratch into the village.

The village continued to grow with large housing developments during the 1960s, 1970s and 1980s. Further development in the new millennium saw building to the west of the canal between Ounsdale and the Bratch.



View looking north from the south west corner of the Site

### Site Description

The Site comprises 1.76 hectares of land located approximately 0.7 miles (1.2km) to the north of Wombourne village centre. It consists of a horse-grazed grassland field, bounded by a mix of hedgerows, trees and fencing. Orton Lane forms the eastern boundary and acts as the main access point. To the south, the Site adjoins rear gardens from properties on Strathmore Crescent and Connaught Drive. Further agricultural land lies to the west of the Site and a Public Right of Way (PRoW) runs along the western boundary. This route provides a pedestrian link to Bratch Lane and a connection to Monarch's Way, the South Staffordshire Railway Walk. To the north, there is an existing property with the boundary lined with trees and hedgerows.

The Site has a high point towards the centre, gradually falling away to the east and west.







The Site and the area immediately to the north of the Site form a draft allocation within the local plan review for South Staffordshire. The draft allocation is split into two distinct parcels of land, with the northern parcel under separate ownership. Whilst the northern parcel does not form part of the proposals, the Site Layout does consider how this land could be accessed in and the proposals safeguard a future connection.



View along PRoW adjacent to the western boundary

### Site Proposals

Land to the west of Orton Lane, Wombourne can deliver the following:

-  **32 new high quality, energy efficient homes in mix of sizes, house types and tenures;**
-  **Locally inspired housing designs that form a high quality new gateway to Wombourne when arriving from the north;**
-  **Retention of existing landscape buffers and new tree planting to create green streets and spaces;**
-  **Sustainable surface water management including swales and attenuation basins with wildlife friendly features, delivering biodiversity and amenity benefits;**
-  **New recreational routes and footways plugging into the existing movement network, promoting active travel and sustainable transport; and**
-  **Community contributions to improve local services, facilities or infrastructure.**









# 2

## Context Analysis

### Planning Policy Context

This section identifies the relevant planning policy context which the proposed development has been informed by and developed in accordance with. The Planning Statement submitted in support of the planning application provides more detail on the planning policy position and considers how the proposed development accords with the adopted and emerging local plan.

#### Current Planning Policy

The development plan for South Staffordshire, the LPA in which the site is located, comprises the following documents:

- The Core Strategy, adopted in 2012
- The Site Allocations Document (SAD), adopted in 2018
- Made Neighbourhood Plans

**Policy GB2** "Land Safeguarded for Longer Term Needs" of the adopted Core Strategy, identified that additional safeguarded land will be identified in the Site Allocations DPD for housing and employment development for the period 2028 – 2038.

The site was allocated in accordance with **Policy SAD3** as "Safeguarded Land for Longer Term Development Needs" by the adopted SAD, in order to meet development needs over the plan period or released through an early plan review. Given this designation, the policy removes the site from the Green Belt and retain it as "safeguarded land" until a review of the Local Plan proposes development of these sites, in whole or in part.

#### Emerging Planning Policy

South Staffordshire began a Local Plan Review in 2018 and it is currently at pre-submission stage, however as of July 2023 it was paused, pending clarity from the Government on the proposed changes to the National Planning Policy Framework (NPPF).

The entirety of the site identified by the adopted SAD as safeguarded land is proposed for allocation in the emerging local plan as established by site **Policy SA5**, this also include additional land fronting on to Orton Lane, which currently lies outside of the safeguarded site and is therefore still designated as Green Belt. The proposed housing allocation has a minimum capacity of 79 dwellings. The site, which is the subject of this planning application, comprises the southern part of the proposed allocation off Orton Lane, with the northern part of the proposed allocation falling outside of the Applicant's control. This notwithstanding, the proposed development has been designed to ensure connectivity to the northern parcel could be provided in the future should that development come forward.

As a result of the current status of the application site, comprising safeguarded land, it is anticipated that it would be determined following the adoption of the emerging Local Plan in due course. To enable this to occur in the most timely manner, the proposal has been designed to accord with the emerging Local Plan Review policies, and will be submitted ahead of the examination to support the emerging plan and demonstrate the deliverability of the site.

#### Material Considerations

Material considerations play an important part in determining planning applications, the NPPF being one of the most important. The revised NPPF was released on 19th December 2023, following a year long consultation process. The general thrust of promoting sustainable development remains. In line with this, the proposal is able to meet the mutually dependent social, economic and environmental objectives of the NPPF (paragraph 8) which underpin this through:

- Providing short term job creation in the form of construction and supply chain work related to construction, along with increased disposable income spending from the future residents, helping to support the vitality and viability of existing services and facilities in Wombourne – including the public bus network

- Providing much needed affordable housing to help people on to the housing ladder
- Incorporating different house types to meet the needs of different people in the community, including family homes and bungalows
- Adding choice and competition to the local housing market, allowing local residents to upgrade or downsize their homes accordingly, making efficient use of family sized homes and retaining local family connections within the area
- Providing enhancements to existing habitats through measures such as supplemental planting and tree retention where possible
- Supporting sustainable means of transport by locating development in close proximity to existing services and facilities and providing pedestrian and cycle links
- Homes will be net zero ready and be designed in accordance with the 2025 Future Homes Standard

The NPPF also supports the delivery of small and medium sites and the importance they make towards meeting the housing requirements of an area, given they are often built out relatively quickly, the proposed development is of a medium scale and is therefore considered to accords with this (paragraph 70).

Overall, the proposal represents a significant opportunity for Wombourne to provide a range of house types, including bungalows, over 30% affordable housing, along side access from Orton Lane, landscaping, drainage and high quality design, in a sustainable location.







## History & Character

Wombourne has a rich history which can be seen through its buildings, with different character and architectural languages reflecting the period and era they were established.

Wombourne High Street, which extends from the main road A449 (Stourbridge Road) reflects a selection of Tudor style old shops, and pubs such as the Old Bush pub and The Vine Inn which dates back to the early 1700 and became an inn in 1851. The High Street extends further to the south-west where the road converges near the 13th-century St. Benedict Biscop Church. The church, standing as a testament to the village history, past and growth bears intricate architectural craftsmanship reflecting its period of establishment in 1170.

Historically, Wombourne was an agricultural village. However, the village became more involved with industry from the late 1700s. Following the Industrial Revolution, the Staffordshire and Worcestershire Canal was opened in 1771 which served to integrate areas such as Bratch, Swindon and Wombourne more closely with its surrounding villages. The canal was also used to transport ore, coal and limestone.

To the west of the village is the Mansion Court, formerly a Heath House in 1817, a residence of the Foley family who were responsible for iron-work in the village. The forge was later converted to a corn mill, which was in operation until the 1930s. Historically, Wombourne was a centre of nail-making, which remained important into the 20th century.



View along Church Road adjacent to the village green

The village remained quite small until the mid 20th century, when it underwent a period of growth, including the construction of several hundred council houses by Wolverhampton council and the absorption of the hamlets of Giggetty, Blakeley, Ounsdale and the Bratch into the village. This growth continued with new housing developments during the 1960s, 1970s and 1980s, with some new housing development into the new millennium.

In terms of the pattern of development, the village of Wombourne has witnessed an organic pattern of growth with the village sandwiched between the B4176 to the west and A449 to the east with the South Staffordshire Railway Walk running across the centre of the village from the north to the south, following the former railway line.

The original village of Wombourne evolved around the village green, and this area alongside the neighbouring streets continues to be a commercial hub for the village today, with a number of independent shops, cafés and other services located in this area.



St. Benedict Biscop Church



High Street



Mansion Court, formerly Heath House, was a residence of the Foley family attached to their industrial complex at Heath Mill

### Sutherland Drive



- Properties on Sutherland Drive are typically 2 storey semi-detached dwellings with generous front gardens.
- Parking is typically on plot to the front of properties, or in garages and car ports.
- There are footpaths on both sides of the street, with houses overlooking the street.
- Materials include red and orange multi brick, brown roof tiles and some use of white render.

### Bratch Lane



- Bratch Lane features a regular rhythm of semi-detached properties.
- The street features footways to both sides of the street and a grass verge on one side.
- The street is wider causing informal parking on the edge of the street.
- Properties are typically red or multi-brick, with occasional use of render.

### Strathmore Crescent & Connaught Drive



- Properties on the northern edge of the street back onto the southern boundary of the Site.
- The street typically features 2 storey dwellings, with single storey homes located to the west on Connaught Drive.
- Boundary treatments are typically low level planting, with or without a low brick wall.
- Parking is typically on plot in garages or to the front of dwellings.
- Opportunity to replicate/ extend similar street layout and character further to the north.

### Orton Lane



- Orton Lane is the main connection to the Site with a footpath on one side of the street.
- The eastern side of Orton Lane is sloping upwards towards Ladywell Wood.
- Properties to the western side of the street feature a consistent building line and front gardens of 7-8m, whilst properties on the eastern side of the street feature larger and more varied set backs.





**Local Services & Facilities**

The Site is well positioned to provide access to a range of facilities and services via sustainable transport modes.

**Walking & cycling - Access to services/ facilities**

The Railway Cafe, situated on Monarch's Way South Staffordshire Railway Walk, is located approximately 400m from the Site, accessible via a Public Right of Way located to the west of the Site. Located nearby, approximately 450m from the Site, is the Bratch Scout Group Hut. Within 800m of the Site is Bratch Park and bus stops on Bull Meadow Lane. Within a 25 minutes walking distance (circa 2 kilometres) a number of educational facilities can be reached which includes Wombourne High School, Wombourne Community Primary School, St Benedict Biscop C of E Primary School, and Sanhills Day Nursery.

In addition, a number of local amenities within Wombourne village centre are within walking distance including, but not limited to, Willow Dental Centre, Gravel Hill Medical Surgery, Spar Convenience Store, Wombourne Leisure Centre, and Boots Pharmacy. Furthermore, there is a PROW named 'Wombourne 23' which extends along the western boundary of the site connecting to Bratch Lane to the south and Orton Lane to the north.

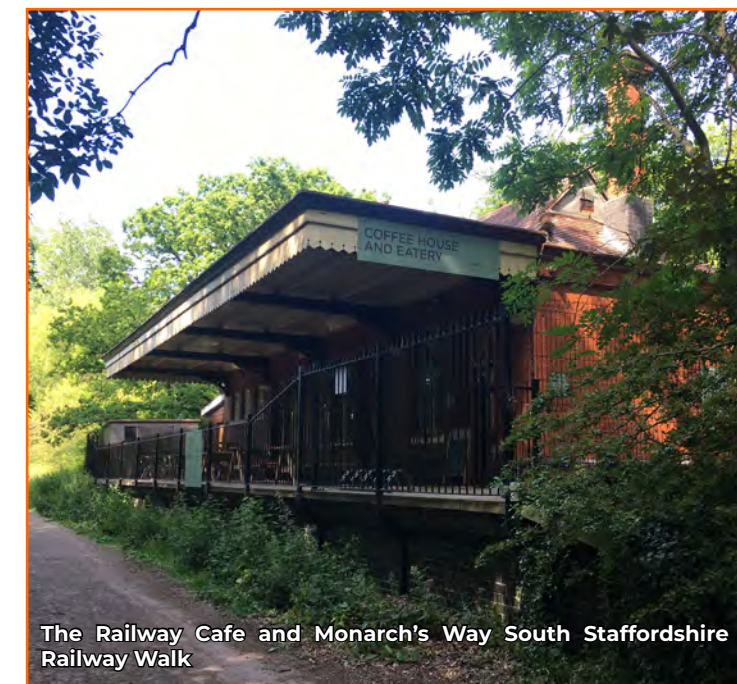
Within a 15-minute cycle from the centre of the site demonstrates the entirety of Wombourne and surrounding areas including Trysull, Lower Penn, Smestow and Swindon are within comfortable cycling distance. A number of employment facilities are within cycling distance including Copart Wolverhampton, Sainsburys Supermarket, McCain Foods, Spectrum Brands and Maywood Care Centre.

There are a number of advisory cycle routes which are within close proximity of the site. These cycle routes provide access to the centre of Wombourne and towards Wolverhampton to the north of the site along the traffic free route called the South Staffordshire Railway walk.

**Public Transport**

The closest bus stops to the site are located on Bull Meadow Lane within 650 metres south of the site. These bus stops can be accessed on existing footways along Orton Lane and Bull Meadow Lane. These bus stops are served by bus routes 15 and 16 at a frequency of 1 bus per 30 minutes in each direction. The bus routes provide services to Merry Hill Bus Station, Swindon, Wordsley, Wolverhampton Bus Station and Stourbridge Interchange.

- KEY:**
- Site boundary
  - - - Public Right of Way
  - A449
  - Staffordshire & Worcestershire Canal
  - - - South Staffordshire Railway Walk
  - Bus stop
  - School
  - Wombourne Library & Community Centre
  - Doctors Surgery/Pharmacy
  - Pubs/Bars
  - Restaurants/Takeaways
  - Cafés
  - Hotel
  - Post office
  - Petrol station
  - Place of worship
  - Sports/recreation ground
  - Leisure centre
  - Employment area
  - Supermarket
  - Local convenience store
  - Community centre/Village hall
  - Retirement village



The Railway Cafe and Monarch's Way South Staffordshire Railway Walk



The Railway Cafe and Monarch's Way South Staffordshire Railway Walk



The Bratch Scout Group Hut





# 3

## Design Evolution

### Constraints & Opportunities

The constraints and opportunities plan draws together all the baseline information and summarises the main considerations for the Site. These have been carefully considered when developing the masterplan layout. For full details of all constraints please refer to the accompanying technical reports which support this application.

#### Landscape and Arboriculture:

There are a number of existing trees and hedgerows to the Site boundaries, particularly to the northern and eastern boundaries. These should be retained and enhanced where possible in order to maintain existing habitats and integrate the proposals into the surrounding context.

Built form will be set back from the tree belt along the northern edge, providing a green edge. There is the opportunity to provide a new recreational route through public open space providing a loop around the northern area of the Site.

#### Ecology:

A Preliminary Ecological Appraisal and Ecological Impact Assessment (EclA) has been produced to support this planning application, as well as a suite of further survey work conducted at the Site. The EclA identifies baseline ecological features present on-site and provides tailored mitigation and enhancement measures to be adopted within the scheme.

The Site consists of a single, horse-grazed grassland field bounded by a mix of hedgerows, treelines and fencing. The native hedgerow network and mature trees bounding the Site provide habitat opportunities for wildlife, as well as promoting connectivity to the wider area. Protected species surveys for amphibians, reptiles and badgers have been conducted, with no reptiles, amphibians or badgers found to be using the Site. Seasonal walked transect and static monitoring surveys have recorded a range of common and

widespread bat species, mostly utilising vegetated boundaries for foraging and dispersal.

Ecological features of interest have been considered during the production of the design proposals, resulting in a scheme that avoids impacts to the features of most ecological value. The hedgerow and mature trees to the north will be retained, with new hedgerow planting along the western and southern boundaries to provide a net increase in this habitat resource. Proposals also seek to create a SuDS basin planted with a diverse wildflower meadow mix to the south-east, and a swale planted with biodiverse grassland to the west. A range of ecological enhancement measures have been prescribed and will be incorporated into the scheme, including bat and bird boxes within new dwellings and log piles within areas of tall grassland.

#### Flood Risk and Drainage:

The entirety of the Site is within Flood Zone 1 (lowest risk of flooding). External levels on Site will be designed to channel any flood water away from buildings and away from the Site boundaries where there may otherwise be a risk of flooding to neighbouring properties. The provision of permeable paving, an on-site infiltration basin, infiltration swale and attenuation tank will ensure that there will not be an increase in the likelihood of flooding elsewhere. These green Sustainable Drainage Systems (SuDS) features shall be utilised for storage which will reduce surface water volumes by evapotranspiration. The surface water drainage networks shall be designed with contingency to accommodate an extreme storm event. Landscaping in and around the basin and swale will create new habitats to support biodiversity.

#### Heritage and archaeology

A desk-based review established that there are no known archaeological features within the Site. Nor is there any evidence for known features in proximity to the Site which would suggest that there are archaeological features of significance within the Site.

#### Transport and Movement:

Vehicular access should be provided off Orton Lane. This access should accommodate footways to promote pedestrian movement. Additional pedestrian access should also be provided towards the north of the site, with accessibility between the Site and existing footways incorporated to include pedestrian crossings within the Site and to the north of the Site on Orton Lane.

The existing footway to the south of the Site will be extended along the Site frontage to ensure connectivity. This will be located to the west of the existing tree belt to prevent damage to tree roots. The internal streets should be designed to allow for future links to the draft allocated land to the north of the Site.

#### Existing residential development

Rear gardens of existing residential development form the southern boundary of the Site. Proposed development should respond sensitively to this boundary, with the back or side of properties orientated towards the boundary, creating enclosure and ensuring existing properties are not overlooked.





## Design Evolution

Following the preparation of the Constraints and Opportunities plan, a Framework Plan was developed as part of the design evolution. This helped to establish overall principles for the Site and the development of an illustrative layout. The Illustrative Layout was presented as part of pre-application discussions, with further refinements made to the design, and the illustrative layout updated for presentation as part of the public consultation.

### Public Engagement Strategy

Community involvement is a key point within the national planning policy framework (NPPF) and Bellway Homes have engaged and interacted with the community and local stakeholders as part of the design process for the proposals on this Site.

Pre-application advice was sought from the Council in February 2023 (Ref: 23/00016/PREAPP) for development of circa 45 dwellings on part of the site proposed for allocation in the emerging plan. Following which, a meeting with the Development Team was held on 20<sup>th</sup> April and a written report received.

Following this, draft proposals were progressed for up to 32 dwellings, which formed the basis of further consultation.

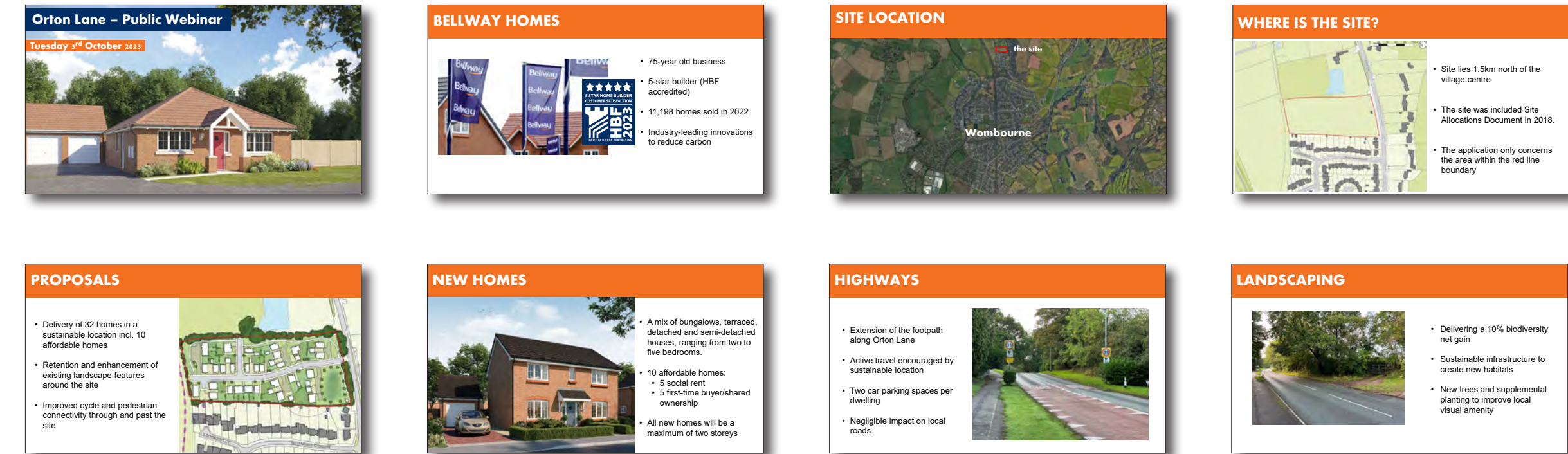
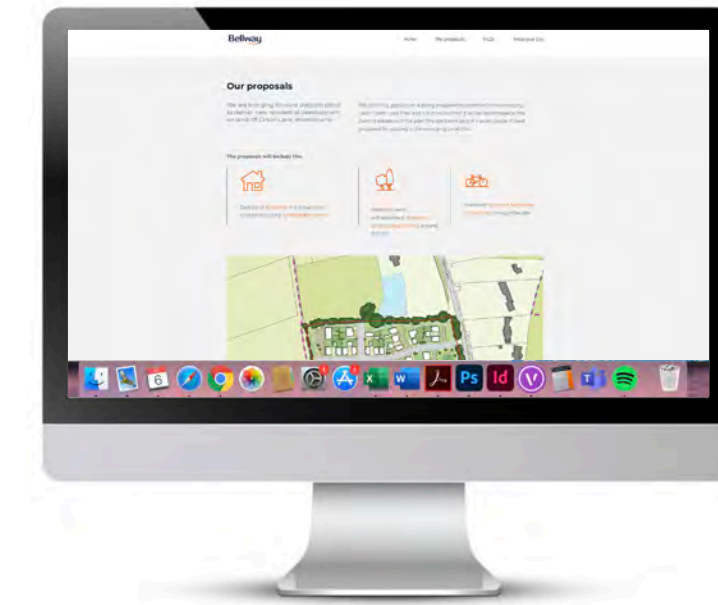
A Consultation and Engagement Strategy was prepared and shared with South Staffordshire District Council officers in August 2023. Prior to launching the pre-application consultation, a meeting was arranged with the local ward councillors on 19<sup>th</sup> September. Key themes discussed included: the Site's planning history; the impact on existing residents; traffic and speeding on Orton Lane and management of construction traffic.

The pre-application public consultation ran between 22<sup>nd</sup> September and 13<sup>th</sup> October 2023. The proposals were shared via a website <http://www.landatortonlane.co.uk/>. Local residents and the community were informed of the consultation through social media adverts and a leaflet. Dedicated communications channels (feedback form, email address and phone number) were provided for the local community to provide feedback. A live webinar was streamed on 3<sup>rd</sup> October 2023 and a recording uploaded onto the website. Members of the project team presented the proposals and answered questions from the virtual audience. 18 people attended the webinar.

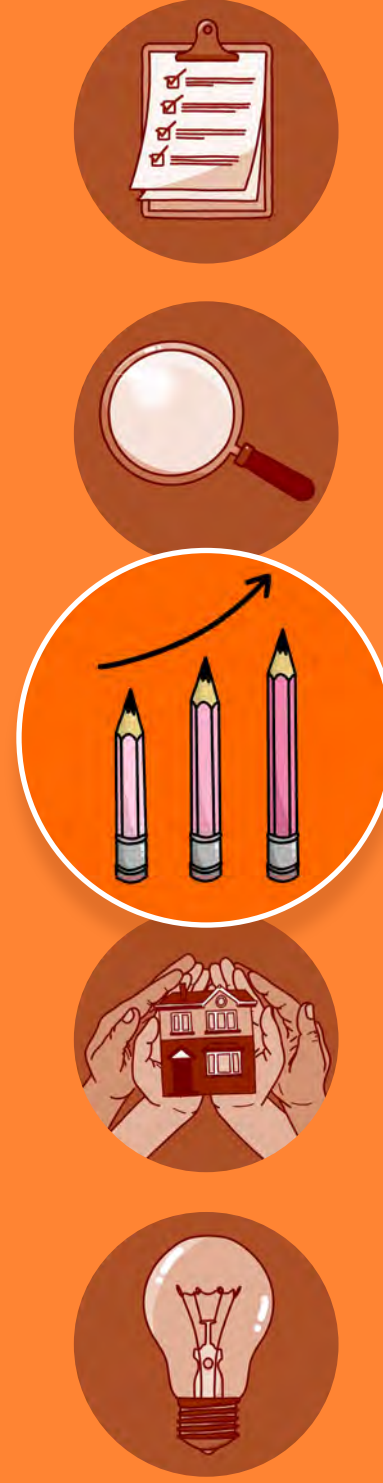
Extracts of the material prepared for the public consultation can be seen in the adjacent images. For full details of the public engagement strategy please see the Statement of Community Involvement which is accompanies this application.



Consultation leaflet



A selection of the slides presented as part of the webinar





# 4

## The Masterplan

### The Proposal

The proposals demonstrate that the Site can deliver 32 new high-quality homes, including 10 affordable homes, set within green streets and enhanced boundary planting.

The Site layout has been sensitively designed to retain existing landscape features including trees and hedgerows to the Site boundaries and provide potential future connections to the draft allocated land to the north of the Site and to the Public Right of Way (PRoW) to the west.

The proposals will increase local housing choice, providing a mix of dwelling types, tenures and sizes which cater for a variety of households to create an integrated community. The proposals will also support local facilities and businesses by bringing new residents to the village, therefore helping to maintain the viability, sustainability and vitality of the wider district.

The access to the Site will be designed to create a landscaped gateway, framed by existing vegetation along Orton Lane. On entering the Site, properties overlook an area of green space and a planted infiltration basin creates an attractive feature. Dual aspect dwellings create a strong frontage, address the primary street and ensure passive surveillance of the public realm.

New homes will be set back from the Site's boundaries with existing neighbours, ensuring the proposals sensitively integrate into the surroundings. The heights of the homes would be predominately two storeys but also include some bungalows, ensuring a range of housing options to meet the varied needs of the local community.

The homes will be set within an improved and enhanced landscape that will include additional tree planting along the primary access routes to the Site and areas of open space, offering dual benefits of visual amenity and biodiversity net gains.

The proposals are designed to integrate into the existing site context and surrounding development, drawing key influence from the existing built form and character of the area and the local vernacular. This has ensured that a high-quality development is proposed which reflects the local area but also creates its own sense of place and identity.

Bespoke house types are proposed which use a mixed palette of complimentary materials to ensure there is variety and visual interest within the proposals and that they remain attractive throughout the lifetime of the development. Further detail on the materials and house types proposed is set out within this chapter and in the drawings that accompany this application.

New homes will incorporate energy efficient and sustainability measures, to reduce overall energy requirements and future proof them against future climate impacts.

The proposed new homes will not have a significant impact on the highway network given the smaller number of homes on the Site. To reduce dependency on the private car, a pedestrian/cycle route is proposed along the northern edge of the site to allow for and encourage easier walking and cycling connectivity with the rest of the Site.



### KEY:

- Site boundary
- Fencing - rear/side boundaries
- Fencing - plot boundaries
- Fencing - internal boundaries
- Personnel access gate
- 1.2m estate railings - colour black
- 1.2m oak posts
- 2.2m entrance brick pillars - 0.665 x 0.665m pier
- 1.8m brick screen wall
- 1.2m brick pier & 0.9m low wall - 0.665 x 0.665 pier
- Proposed tree planting
- Existing trees / hedging to be retained
- Existing trees/ hedging to be removed
- Root protection area
- Primary house entrance
- Secondary house entrance
- Handing of unit 'AS' - As drawn, 'OP' - Opposite hand
- Electric sub station
- Bin collection point
- M4 (2) housetypes
- M4 (2) housetypes - level threshold rear access
- Affordable housing units 'SR' Social rented
- Affordable housing units 'SO' Shared ownership
- Affordable housing units 'FH' First home
- Concrete block paving - colour red brindle laid 90 degrees herringbone pattern. No vertical deflection when laid in adoptable highway.







### Housing Mix

The proposals focus on providing a range of dwelling types, sizes and tenures to promote a diverse and inclusive community in line with emerging Local Plan policy.

The proposals provide 31% affordable housing, in line with policy requirements to provide 30% affordable housing. The affordable housing provision includes social rented, first home and shared ownership.

As shown on the site layout, the affordable housing has been distributed across the proposals in small clusters.

68% of the market units are made up of 2 and 3 bedroom homes, the increased supply of which is identified as a need within the emerging Local Plan and ensures the development is not dominated by larger housetypes in a disproportionate manner. Providing smaller residential units for young families and older people wishing to downsize will free up family sized accommodation elsewhere in the community.

A range of housing options that meet the varied needs of the South Staffordshire community will therefore be provided, including family homes, bungalows and houses ideal for first time buyers.

The local area has an ageing population which is higher than the national average, therefore the inclusion of bungalows ensures that the proposals for the Site meet a specialist housing need. As they get older, a majority of people prefer to live in single-storey properties within neighbourhoods that have good amenities and public transport links like Wombourne.

A summary of the housing mix is presented in the following table and adjacent plan.



Provision of bungalows to meet local needs

House Ref	House Type	No. of beds	No. of units
Wo	Bungalow	2	2
Cs	House	2	4
Bm	House	3	4
Re	House	3	2
Bol	House	3	3
Ar	House	4	2
We	House	4	2
Wa	House	5	3
Sup	Studio over garage	0	5
<b>TOTAL PRIVATE</b>			<b>22</b>

House Ref	House Type	No. of beds	No. of units
<b>Affordable - Social Rented (SR)</b>			
Bu43	Bungalow	2	1
Mn	House	2	1
Df	House	3	2
Ct	House	4	1
<b>SUB TOTAL</b>			<b>5</b>

House Ref	House Type	No. of beds	No. of units
<b>Affordable - First Home (FH)</b>			
Mn	House	2	2
Df	House	3	1
<b>SUB TOTAL</b>			<b>3</b>

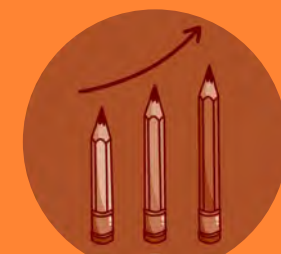
House Ref	House Type	No. of beds	No. of units
<b>Affordable - Shared Ownership (SO)</b>			
Mn	House	2	2
<b>SUB TOTAL</b>			<b>2</b>
<b>TOTAL AFFORDABLE</b>			<b>10</b>

<b>COMBINED TOTAL - PRIVATE &amp; AFFORDABLE</b>			<b>32</b>
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- KEY:**
- Site boundary
  - 2 bed house
  - 3 bed house
  - 4 bed house
  - 5 bed house
  - Bungalow
  - Studio over garage
  - Affordable - Social Rented
  - Affordable - First Home
  - Affordable - Shared Ownership







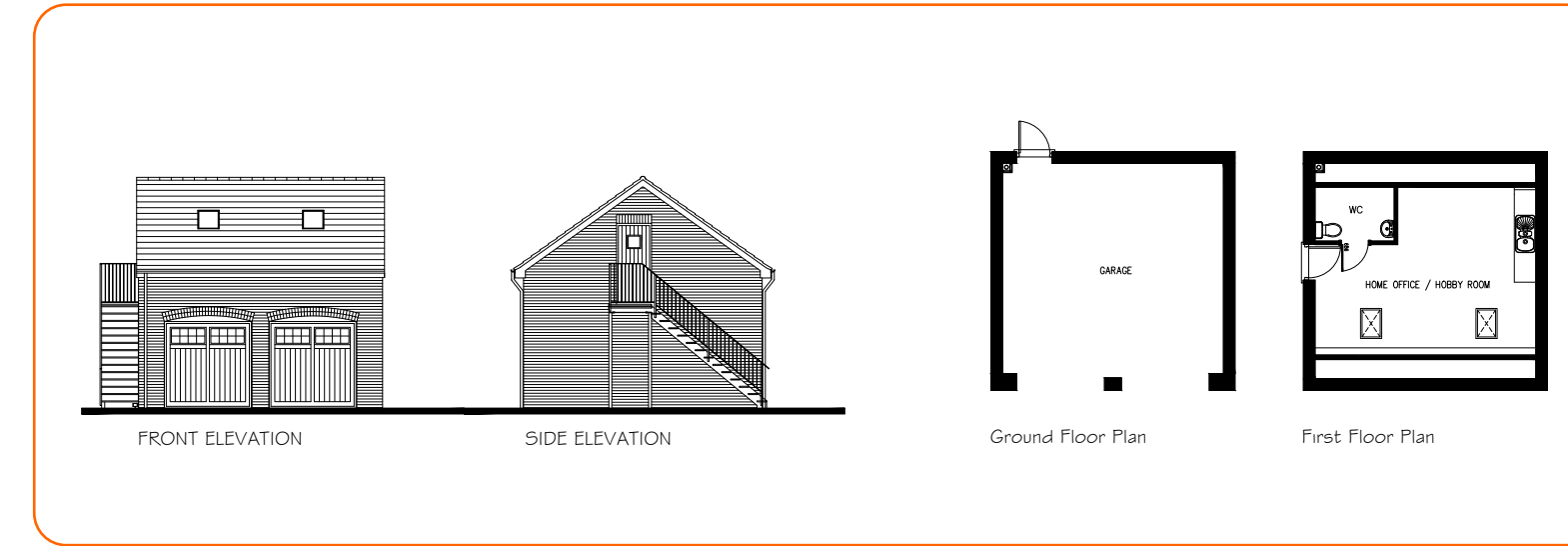
### Architectural Strategy

As outlined on the previous pages, the proposals provide a variety of housetypes to meet varied needs. The proposals include a range of 2, 3, 4 and 5 bed homes. All dwelling are two storeys, except the bungalows which are single storey. These are located towards the west of the Site, creating a soft transition to the agricultural land beyond the Site and responding to the existing bungalows on Connaught Drive adjacent to the Site in this area.

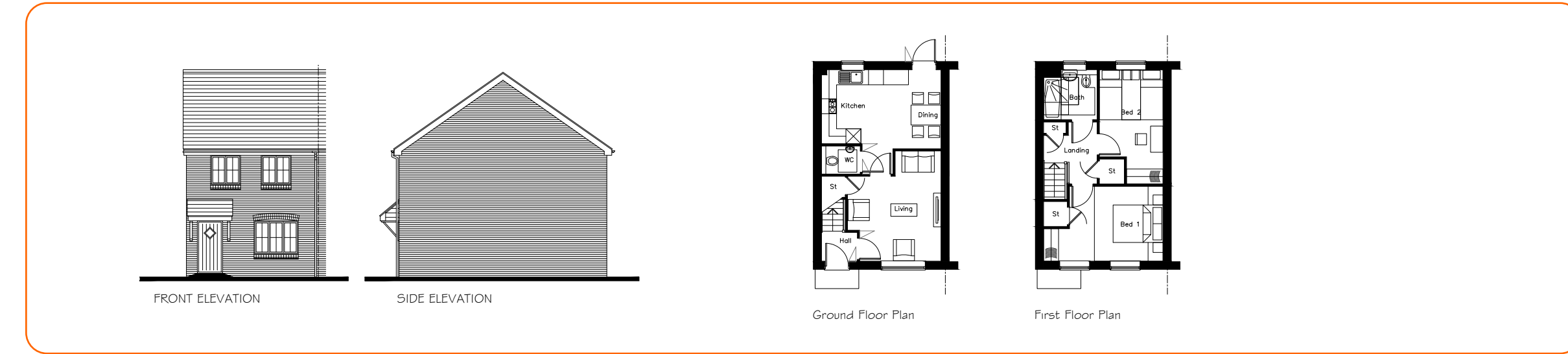
The proposals also include 5 studio over garage units, with plots 3, 28, 29, 31 and 32. This provides additional opportunities for home working, supporting varied lifestyles and new ways of living and working.

An extract of the housetypes are shown on the following pages. Full details of all housetypes are submitted as separate drawings as part of this application.

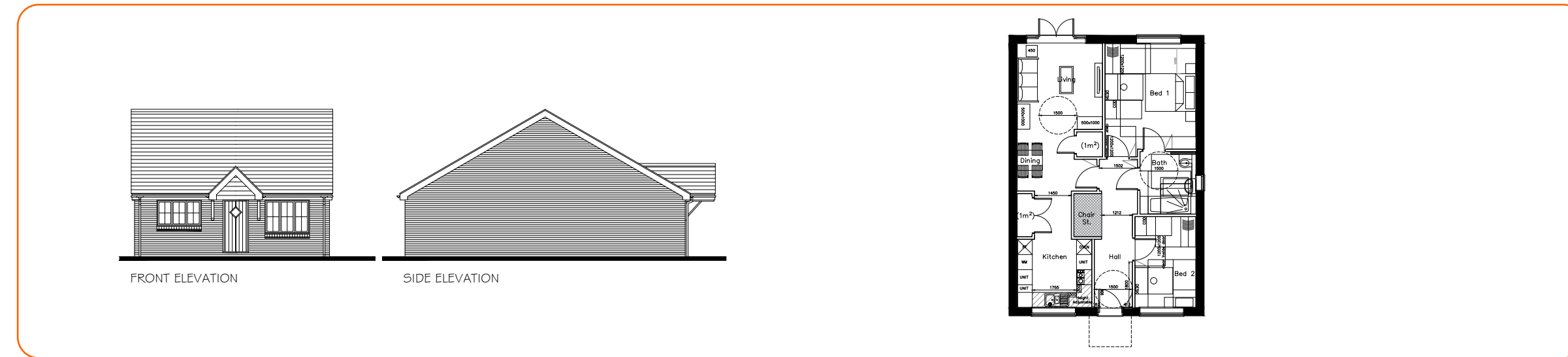
Example Studio over Garage 'Sup' (plots 3, 28,29, 31 & 32)



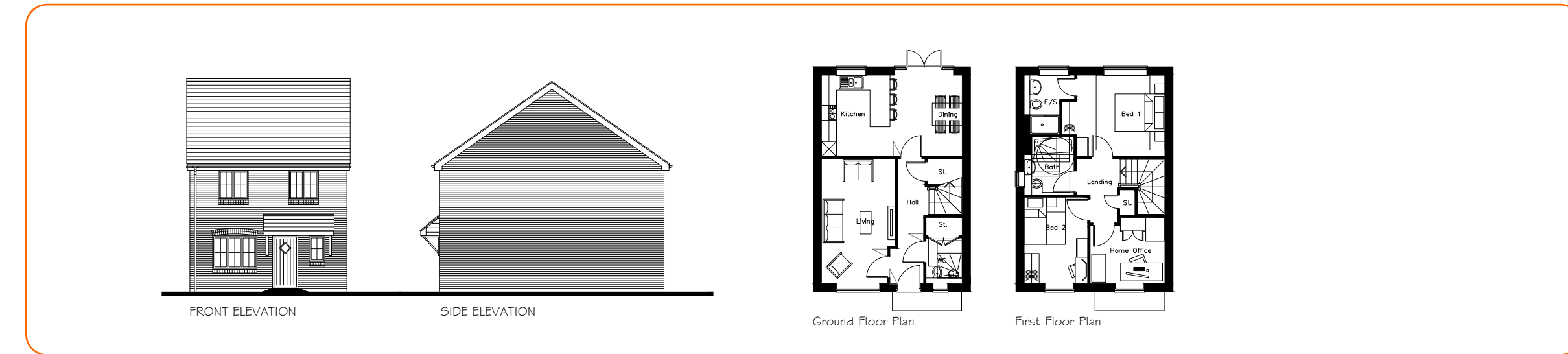
Example 2 bedroom house 'Ma' (plots 17, 18, 23,25 & 26)



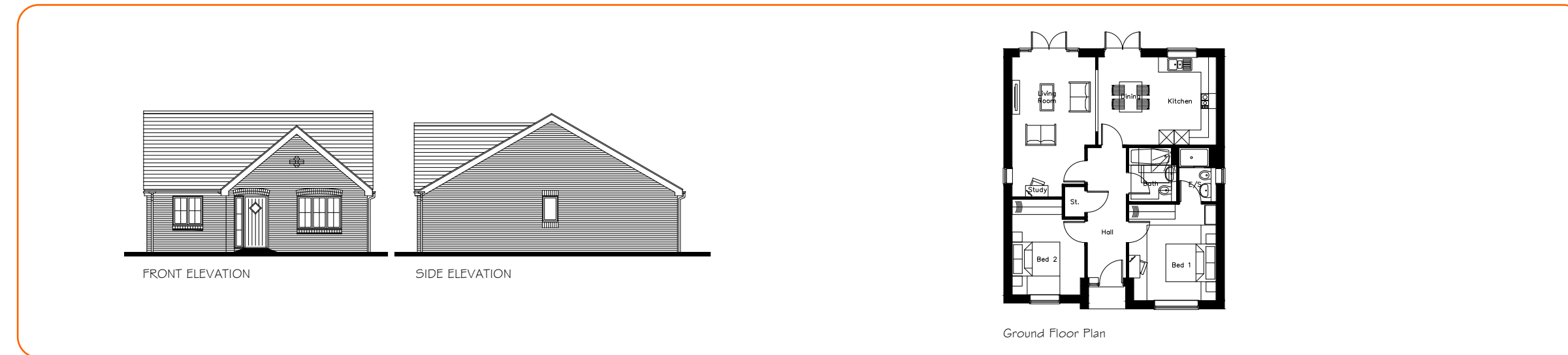
Example Bungalow 'Bu43' (plot 16)



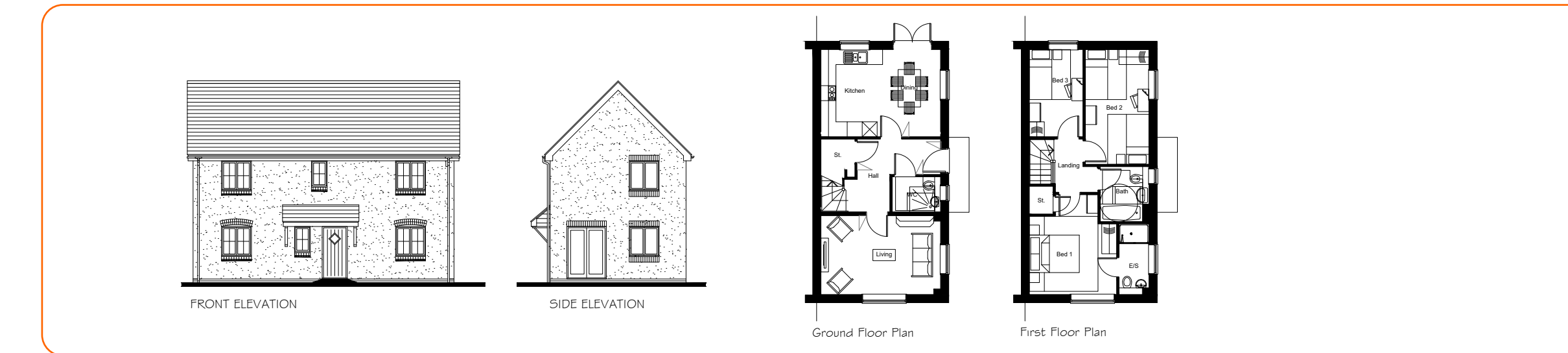
Example 2 bedroom house 'Cs' (plots 7, 8, 22 & 27)



Example Bungalow 'Wo' (plots 20 & 21)

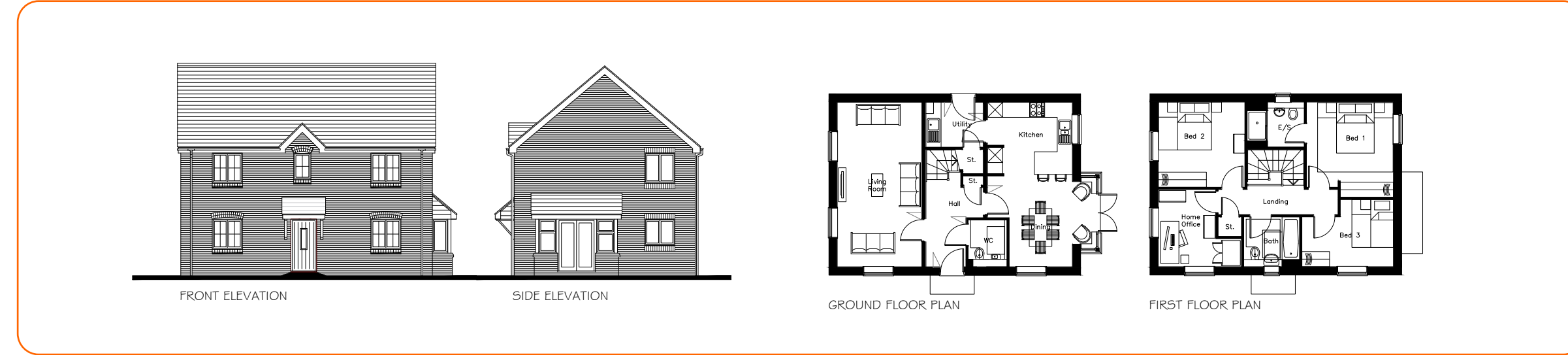


Example 3 bedroom house 'Bm' (plots 4, 9 & 13)

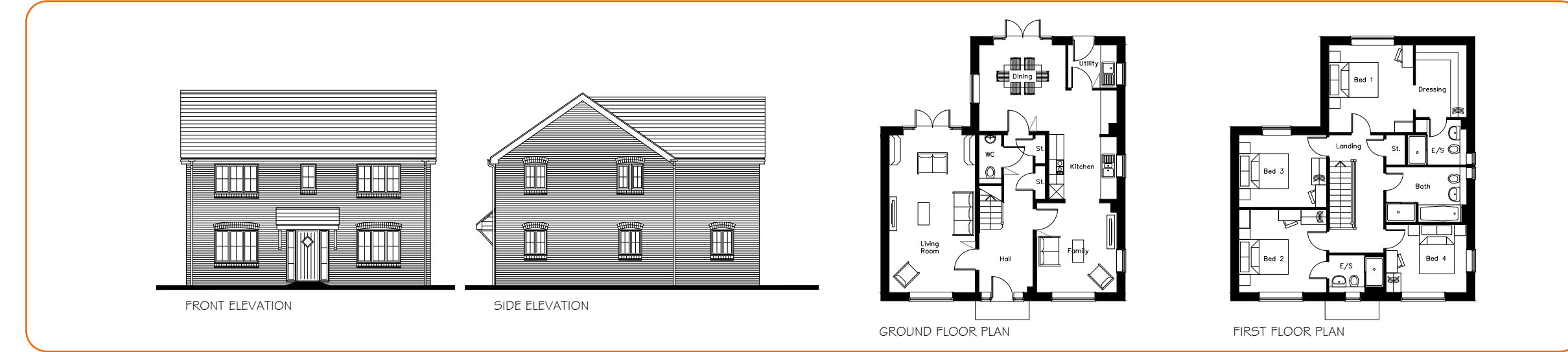




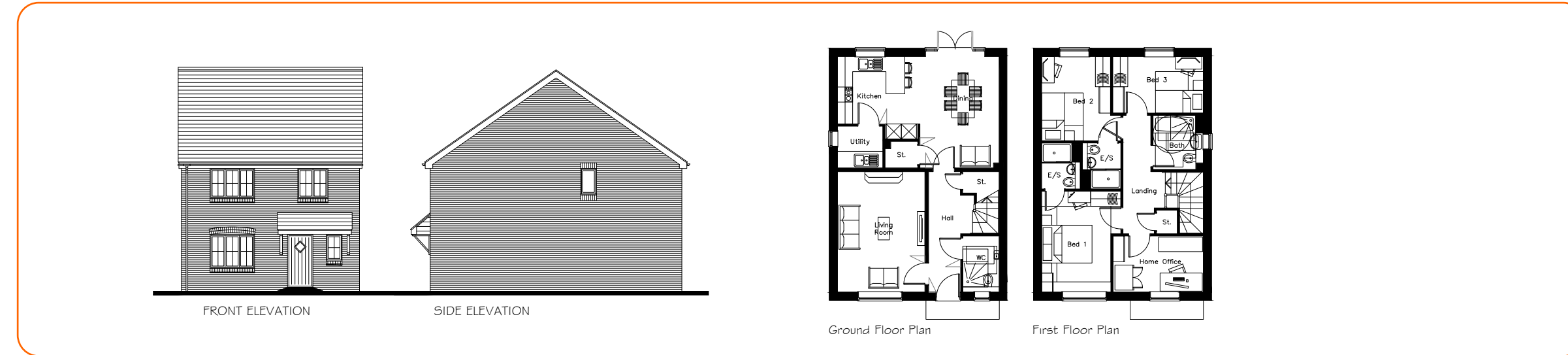
Example 3 bedroom house 'BoI' (plots 2 & 6)



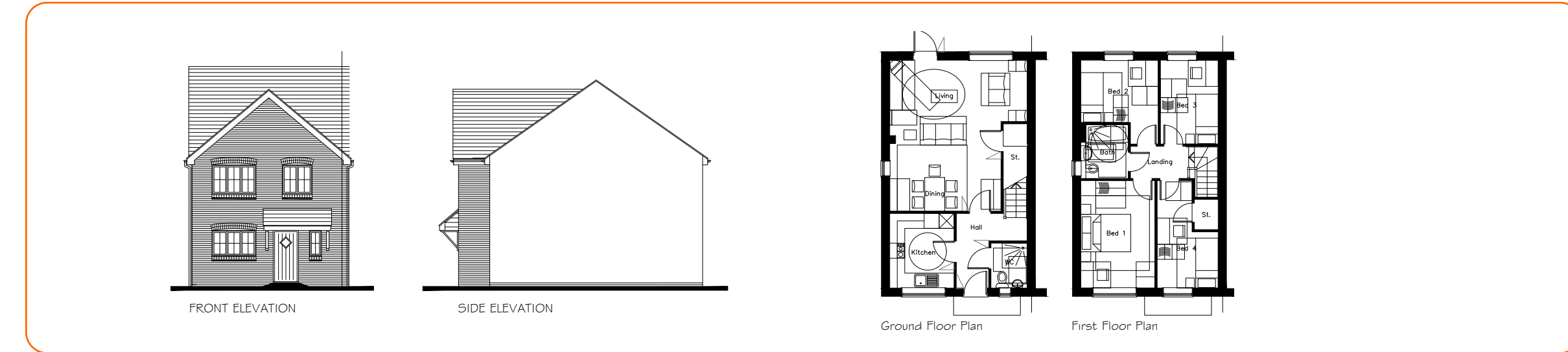
Example 4 bedroom house 'We' (plots 3 & 28)



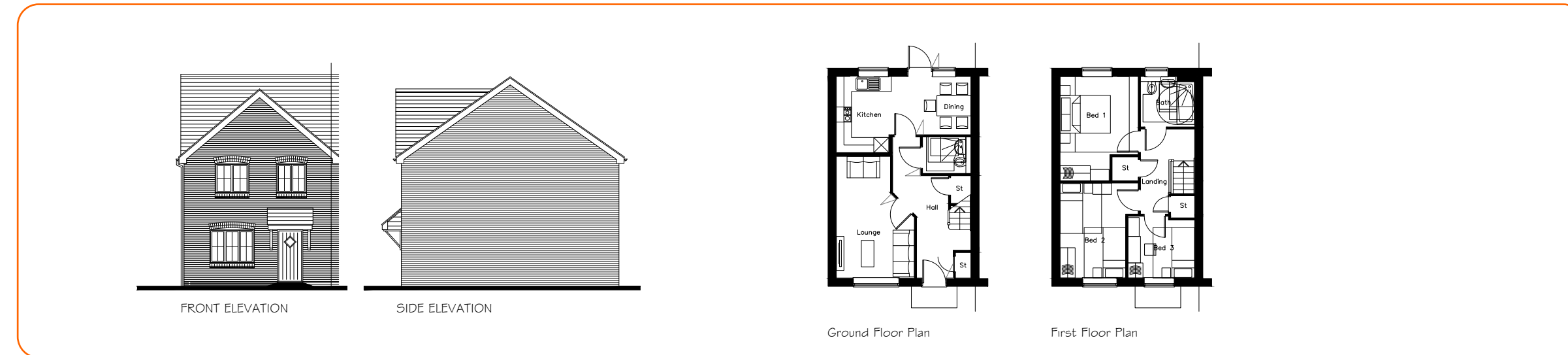
Example 3 bedroom house 'Re' (plots 14 & 15)



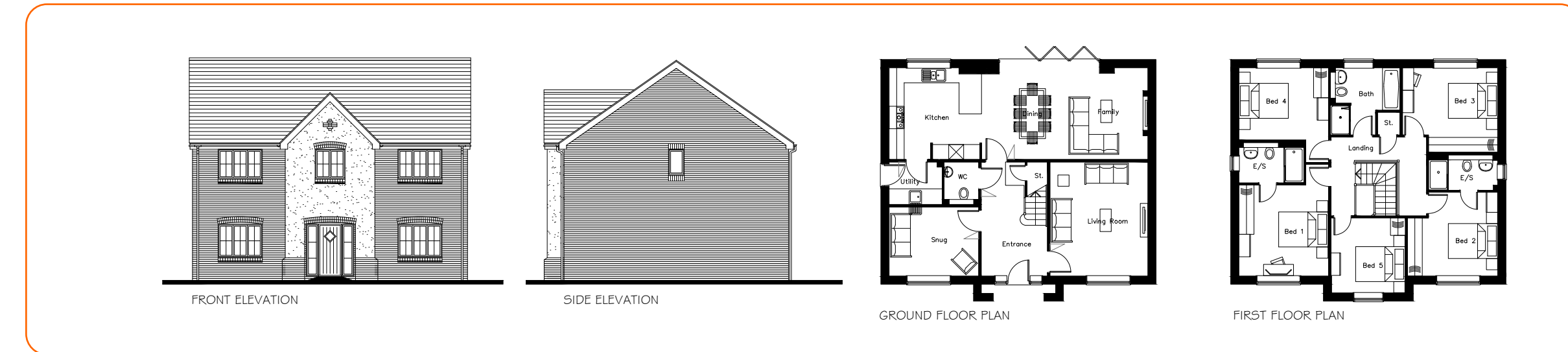
Example 4 bedroom house 'Ct' (plot 12)



Example 3 bedroom house 'Df' (plots 19 & 24)



Example 5 bedroom house 'Wa' (plot 31)







**Materials**

Materials throughout the development are proposed to be in keeping with the surrounding context. The proposed materials for the Site can be seen on the adjacent plan.

Properties towards the east of the Site are proposed to be red multi brick with a grey roof tile. Towards the west, properties will be orange multi brick with a brown roof tile, creating a transition in character and identity.

Render is used for key corners and landmark buildings, helping to aid wayfinding through the Site, creating variety and interest.

Rainwater goods are proposed in black uPVC throughout.

Block paving in red brindle laid in a herringbone pattern is proposed to break up areas of hardstanding, highlight road narrowings, at the gateway to the Site and for areas of frontage parking.

The variation in materials including key buildings on corners is shown in the streetscenes below.

**KEY:**

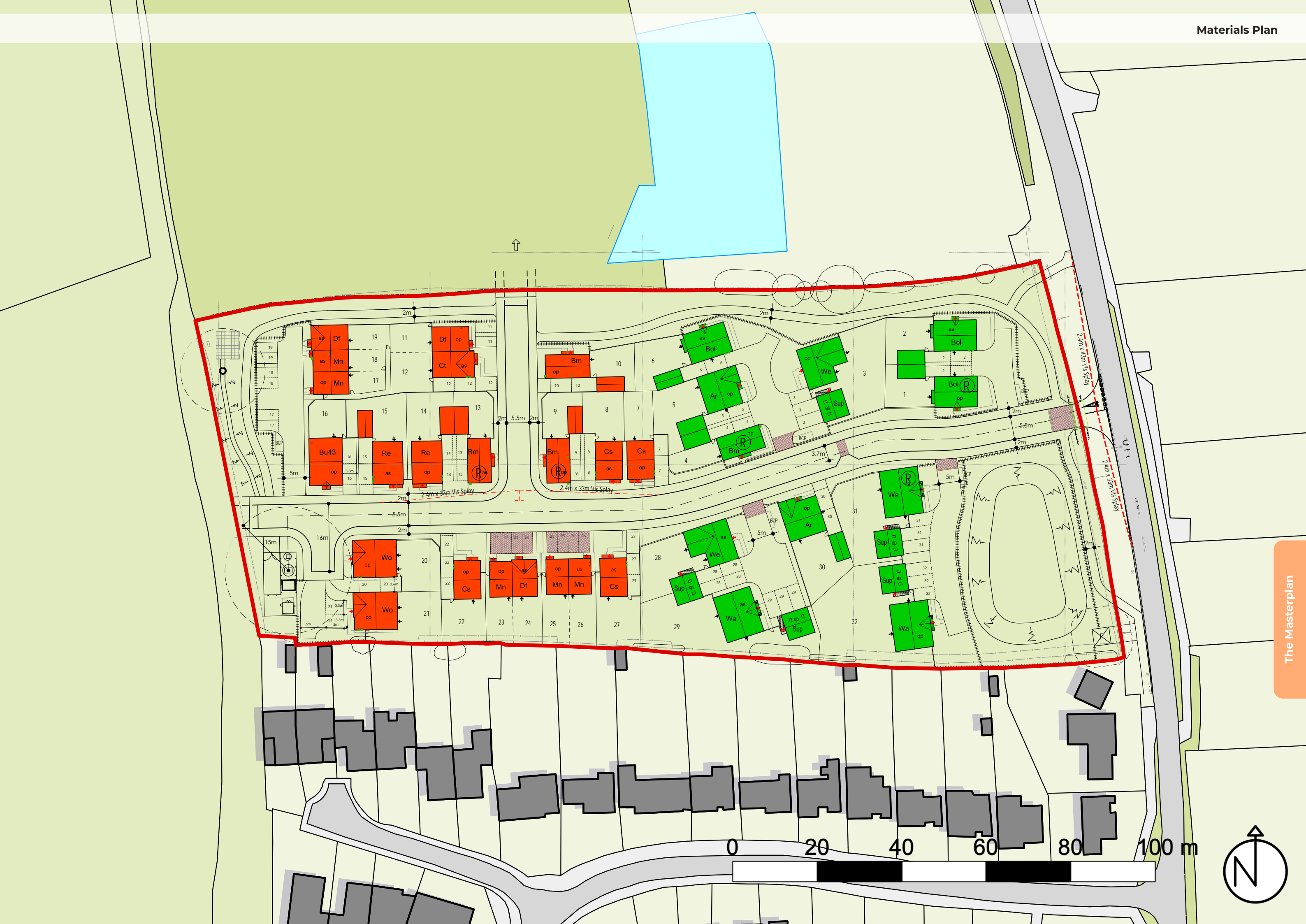
- Site boundary
- Brick: Terca New Red Multi Gilt Stock  
Tile: Russell Galloway Grey
- Brick: Ibstock Mercia Orange Multi  
Tile: Russell Grampian Peat Brown
- Mortar: Colour Natural with build handle joint
- Contrast brick:  
Ibstock Alderley Orange to Plots 1-6 & 28-32  
Ibstock Dorset Red Stock to Plots 7 -27
- Windows: white uPVC
- Rainwood goods: Black uPVC
- Block Paving: Red brindle concrete block paving laid herringbone pattern
- R Render: Monocouche Monopral Render  
Colour chalk  
Plots 1,4,9, 13 & 31



Street Scene Plots 1 - 2 & 31 - 32



Street Scene Plots 7 - 9 & 13 - 16









**Landscape Strategy**

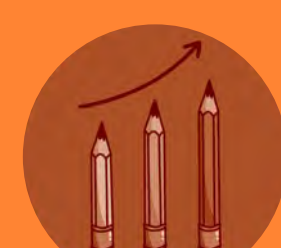
Detailed landscape planting plans have been prepared to support the application and demonstrate the overarching landscape strategy for the scheme, an extract of which is shown on the adjacent plan.

The proposals include the provision of new trees to streets and areas of public open space, in addition to the retention of existing boundary planting, to create green streets and spaces.

Areas of meadow grassland, in addition to amenity grass provide biodiversity benefits.

The infiltration basin and swale will support a sustainable drainage approach. The SuDS will feature planting, ensuring that they are not only beneficial for drainage purposes but will also provide water quality and ecological benefits, strengthening the diversity of landscape typologies within the proposal. This includes a wetland grass mixture and marginal / aquatic planting.

A recreational route creates a pedestrian / cycle loop around the north of the Site, adjacent to the existing tree belt through areas of meadow and amenity grassland ensuring a green edge to the development.



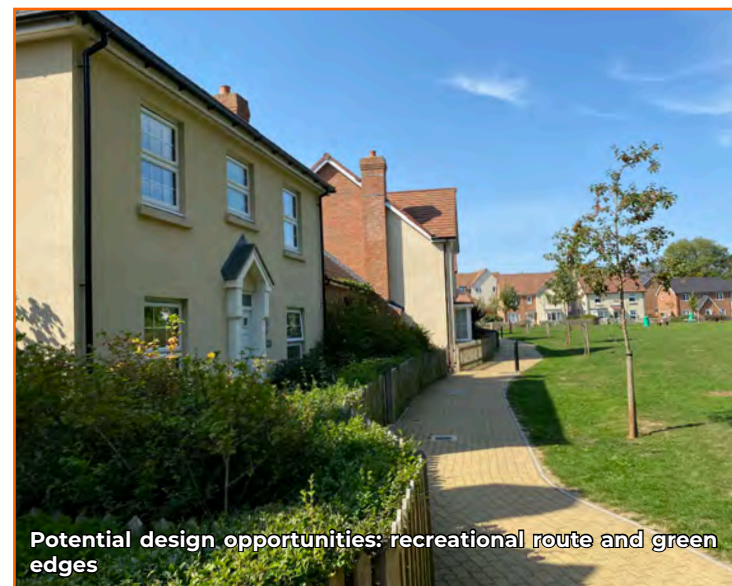
Potential design opportunities: swale



Potential design opportunities: attenuation basin



Potential design opportunities: plot landscaping



Potential design opportunities: recreational route and green edges

**Plant Schedule**

Trees	Abbr	Species	Supply	Size	Girth	Number
MALTR	Malus tiliobata	H80	88	350-425cm	12-14cm	1
SCORASS	Sorbus aucuparia 'Sheerwater Seedling'	H80	88	350-425cm	12-14cm	5
AMARH	Amelanchier arborea 'Robin Hill'	EHSKd	88	425-600cm	14-16cm	3
BETULJ	Betula utilis jacquemontii	EHSKd	88	425-600cm	14-16cm	1
CABRETT	Carpinus betulus 'Travis Fontaine'	EHSKd	88	450-450cm	18-20cm	13
BETULJ	Betula utilis jacquemontii	Multi Stem	88	400-450cm	M5	6
						Total: 29

Specimen Shrubs	Abbr	Species	Pot Size	Height	Habit	Number
PHOAR	Phormium 'Amazing Red'	25L	100-125cm	Trip Cm	4	
PHOJE	Phormium 'Jester'	25L	100-125cm	Trip Cm	5	
PHOSU	Phormium 'Sundowner'	25L	100-125cm	Trip Cm	4	
PHOYEW	Phormium 'Yellow Wave'	25L	100-125cm	Trip Cm	5	
PHOFRES	Protea x travisi 'Red Robin'	70-90L	250-300cm	Standard: Clear Stem to 2m	3	
						Total: 21

Ornamental Hedgerows	Abbr	Species	Pot Size	Height	Habit	Density	Length	Number
PRULU	Prunus lauraster	10L	80-100cm	Bushy	0.4Ctr	238.88m	604	
ELAEH	Elaeagnus ebbingei	10L	80-100cm	Bushy	0.4Ctr	81.77m	207	
								Total: 320.63m Total: 811

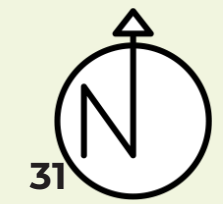
Shrubs (on plot)	Abbr	Species	Pot Size	Height	Habit	Density	Area	Number
CORALE	Cornus alba 'Elegantissima'	3L	60-80cm	Branched	0.8Ctr	5.35m²	9	
AUCJIA	Aucuba japonica	10L	40-60cm	Bushy	0.8Ctr	5.35m²	9	
AUCJAP	Aucuba japonica 'Rosanina'	10L	40-60cm	Bushy	0.7Ctr	2.11m²	5	
BRASJ	Brachyglottis 'Sunshine'	10L	40-60cm	Bushy	0.7Ctr	16.33m²	38	
CEATHR	Ceanothus thyrsiflorus repens	10L	40-60cm	Bushy	0.7Ctr	27.87m²	65	
CHICAP	Choisya 'Aster Pearl'	10L	40-60cm	Bushy	0.7Ctr	4.31m²	15	
CHOTES	Choisya ternata 'Sundancer'	10L	40-60cm	Bushy	0.7Ctr	45.85m²	108	
ELAPUMA	Elaeagnus pungens 'Maculata'	10L	60-80cm	Bushy	0.8Ctr	5.35m²	9	
EUCPOENS	Eucryphia fortunei 'Emerald 'Y Gold'	10L	30-40cm	Bushy	0.7Ctr	25.1m²	62	
HEBMAH	Hebe 'Mystique'	10L	40-60cm	Bushy	0.7Ctr	9.48m²	22	
HEBMAW	Hebe 'Ms Winder'	10L	30-40cm	Bushy	0.7Ctr	16.99m²	41	
HEBBAE	Hebe albicans 'Red Edge'	10L	30-40cm	Bushy	0.7Ctr	32.55m²	81	
HEBPS	Hebe pingpingensis 'Sulphurea'	10L	30-40cm	Bushy	0.7Ctr	28.58m²	66	
HYPRH	Hypocitricum 'Hidcote'	10L	40-60cm	Bushy	0.7Ctr	0.84m²	2	
LAVANHI	Lavandula angustifolia 'Hidcote'	10L	30-40cm	Bushy	0.7Ctr	19.84m²	46	
LAVANMI	Lavandula angustifolia 'Munstead'	10L	30-40cm	Bushy	0.7Ctr	16.41m²	39	
PHOFRES	Protea x travisi 'Red Robin'	10L	60-80cm	Bushy	0.8Ctr	5.35m²	9	
PRILADL	Prunus laurocerasus 'Otto Luyken'	10L	60-80cm	Bushy	0.7Ctr	23.96m²	56	
ROSOF	Rosmarinus officinalis	10L	40-60cm	Bushy	0.7Ctr	7.37m²	17	
SLJARSJ	Salvia japonica 'Rubella'	10L	40-60cm	Bushy	0.7Ctr	17.75m²	43	
PHOJE	Phormium 'Jester'	15L	100-125cm	Trip Crown	0.8Ctr	43.47m²	69	
PHOPURA	Phormium tenax 'Purpuraceum'	15L	100-125cm	Trip Crown	0.8Ctr	28.18m²	46	
								Total: 390.43m² Total: 857

Native Mix Hedgerow	Abbr	Species	Supply	Height	Density	Mix %	Length	
CORAV	Corylus avellana	T1-1-3 Breaks	60-80cm	0.4Ctr	Double Staggered at 0.4m offset	15%	13.01m	
CRAMON	Crataegus monogyna	T1-1-3 Breaks	60-80cm	0.4Ctr	Double Staggered at 0.4m offset	40%	34.71m	
ELAGD	Rex aquatilis	2L	3 Breaks	40-60cm	0.4Ctr	Double Staggered at 0.4m offset	10%	8.68m
PROSP	Prunus spinosa	T1-1-3 Breaks	60-80cm	0.4Ctr	Double Staggered at 0.4m offset	15%	13.01m	
ROSCA	Rosa canina	T1-1-3 Breaks	60-80cm	0.4Ctr	Double Staggered at 0.4m offset	10%	8.68m	
VBOPD	Viburnum opulus	T1-1-3 Breaks	60-80cm	0.4Ctr	Double Staggered at 0.4m offset	10%	8.68m	
								Total: 86.71

Climbers	Abbr	Species	Pot Size	Specification	Number
TRAJIA	Trachelospermum jasminoides	3L	Supplied with Cane	13	
HEDHEGR	Hedera helix 'Green Ripple'	3L	Supplied with Cane	14	
					Total: 27

Marginal / Aquatics	Abbr	Species	Supply	Density	Area	Number
CABAC	Carex acutata	Plug 100cc	10/m²	5.23m²	53	
ELPAL	Eleocharis palustris	Plug 100cc	10/m²	5.23m²	53	
GLYMAX	Glyceria maxima	Plug 100cc	10/m²	5.23m²	53	
BIPIP	Iris pseudacorus	Plug 100cc	10/m²	4.96m²	71	
JUNEF	Juncus effusus	Plug 100cc	10/m²	5.23m²	53	
JUNIN	Juncus inflexus	Plug 100cc	10/m²	5.23m²	53	
SAGSIA	Sagittaria sagittifolia	Plug 100cc	10/m²	5.23m²	53	
SCIEA	Scirpus lacustris	Plug 100cc	10/m²	5.23m²	53	
						Total: 43.57m² Total: 442

- Existing vegetation to be retained.
- Existing vegetation to be removed.
- Proposed decorative gravel to gardens. Exact details to be confirmed by Botway Homes.
- Turf & Seeding  
Turf to plot frontages to be laid as Rotaw 'Medallion', or similar approved.
- Amenity grass - A22 low maintenance seed mixture, as supplied by Germinal (www.germinalamenity.com) or similar approved.
- Meadow grassland - EM1 Meadow mixture supplied by Emongate Seeds (www.wildseed.co.uk) or similar approved.
- Wetland grass mixture - EM3 seed mixture for wetlands, as supplied by Emongate Seeds (www.wildseed.co.uk) or similar approved.











### Parking & Refuse Strategy

The proposed Site Layout is designed to ensure that cars and refuse facilities do not dominate the street scene and are carefully accommodated within plots and within the public realm. The layout has been tracked for all appropriate vehicles including refuse, fire and the private car to ensure streets incorporate appropriate space for vehicles to move through the development.

#### Parking Strategy

Parking provision is provided in line with current guidance, as set out in the South Staffordshire Council Core Strategy (December 2012). This document sets out the recommended residential car parking standards based on the number of bedrooms per dwelling. These are set out in the table below:

Dwelling Type	Recommended Parking Provision
2 bed house	2 spaces
3 bed house	2 spaces
4 bed house	3 spaces
5+ bed house	3 spaces

Based on the above standards, the development would require a total of 72 spaces. The proposed Site Layout includes a total of 73 car parking spaces, in line with this guidance. This should assist with preventing on-street parking from occurring within the Site.

The majority of parking spaces are provided on plot, to the side of dwellings, with some frontage parking also provided. A small number of spaces are also provided on street, in allocated bays. These are in close proximity to dwellings for ease of access.



Electric charging points for all homes

Each house within the Site will have a single fast charge socket installed, located on a parking space within the property's curtilage. The charging points will be in line with the requirements of the SSC Guidance.

#### Cycle Parking

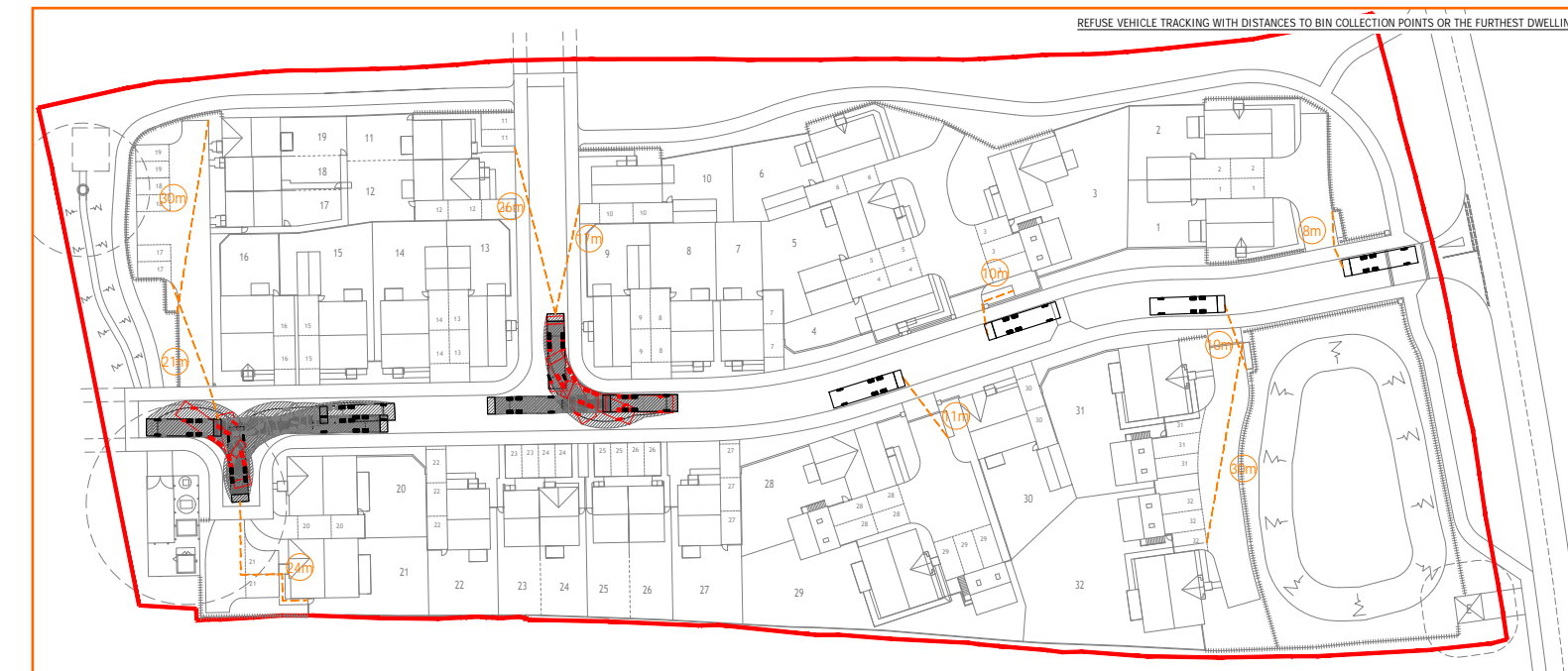
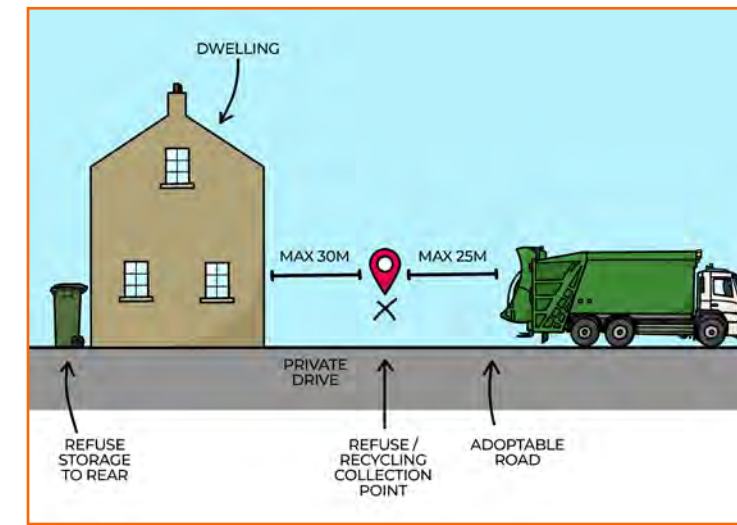
The proposed Site Layout accommodates cycle parking in line with the South Staffordshire Council Core Strategy (December 2012), which states that dwellings should use garages to provide secure, waterproof and accessible cycle parking spaces. Dwellings which do not have garages will have cycle parking located in a secure shed in an accessible rear garden. In addition, the South Staffordshire Council Publication Plan (November 2022) states that all residential dwellings should have a minimum of one secure cycle parking space per unit.

#### Refuse Strategy

Adequate provision for refuse will be made in either garages or back gardens of all properties. This will ensure that bins are not left on streets.

Tracking has been carried out to ensure that the Site Layout is in line with the recommendations contained in MfS, which is able to accommodate a refuse collection manoeuvre within 25 metres of a storage point and reverse a maximum distance of 20 metres at any turning head points on the Site. All adoptable streets are designed with adequate widths and turning to accommodate refuse collection vehicles without encroachment or detrimental conflict.

Homes are designed with adequate storage space to encourage recycling and composting and to minimise overall waste.



### Sustainability Strategy

The development at Orton Lane, Wombourne has been designed to respond positively to national and local plan policy incorporating measures to deliver social and economic benefits, while also protecting and enhancing the environment where possible. Measures to mitigate and adapt to the effects of climate change have been thoroughly considered, following guidance set out in the Council's Sustainable Development SPD including sustainable construction, energy efficiency in design, biodiversity enhancement, and sustainable waste management.

#### Social and Economic Benefits

The development aims to provide a range of social and economic benefits to both new and existing residents through the provision of up to 32 new homes, including 31% affordable housing, providing opportunities for local people. The homes will be designed to create healthy living environments which are flexible for the future and will be in a sustainable location with a range of services and amenities within walking distance of the site.

#### Environmental Protection and Enhancement

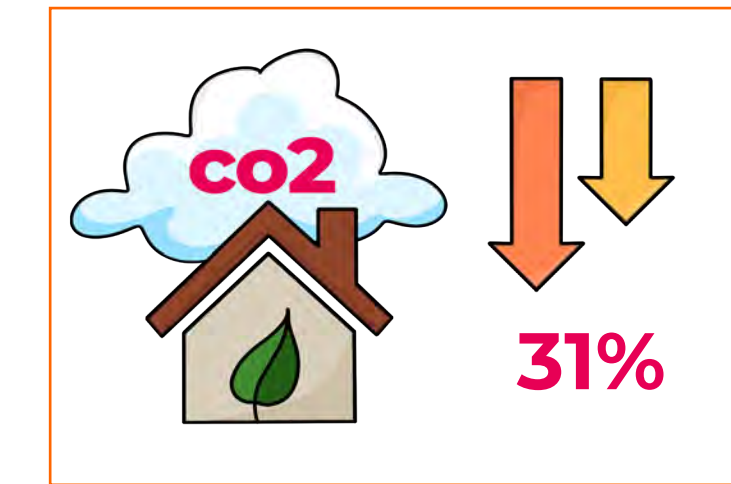
The development will incorporate a range of design measures to protect and enhance the local environment, including designing to make use of sustainable materials, prioritising sustainable and active modes of travel including walking and cycling, protection of on-site ecology and enhancement, and provision of measures through development construction and operation to reduce pollution, minimise waste and encourage recycling.



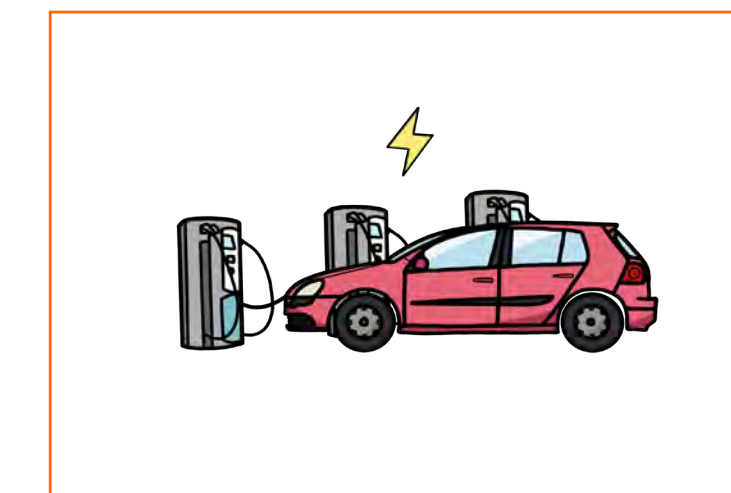
#### Mitigating and Adapting to Climate Change

In recognition of the climate emergency and the Council's Climate Change Strategic Development Framework, the development will incorporate a range of measures to reduce carbon emissions, mitigate the effects of climate change, and to ensure the long-term resilience of the development to the effects of climate change.

Homes will be designed to reduce carbon emissions in accordance with the Building Regulations and interim Future Homes Standard which sets out the Government's pathway for net zero homes. Currently Part L 2021 requires homes to deliver a 31% carbon reduction beyond Part L 2013.



New approved documents Part S and Part O of the Building Regulations came into force in June 2022, which set out guidance regarding Electric Vehicle charging points, with a requirement for one per allocated parking space, and mitigation of overheating, specifying that residential developments must limit unwanted solar gains in the summer and provide means to remove heat.



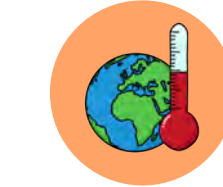
The development will include a range of climate resilience measures including;



Water consumption reduced to 110 litres per person per day through the specification of water efficient fittings.



Homes developed in Flood Zone 1 and a surface water drainage system will be designed to mitigate for a small amount of flood water under a 1 in 100 annual probability plus 45% climate change rainfall event.



Homes designed to account for increasing annual temperatures set out in the UKCP18 climate projections to minimise the risk of overheating.



Enhancements to site biodiversity, targeting a minimum 10% Biodiversity Net Gain incorporating climate tolerant species protecting site habitats and species from changing climate space.



# 5

## Conclusion

### Benefits of the proposal

This document has set out a Vision for the development of land to the west of Orton Lane, Wombourne.

The proposals are demonstrably deliverable based on the Site Assessment work that has been carried out to date, and the Site Layout describes a high quality new residential offering for Wombourne.

As a draft allocated Site, with close proximity to a range of facilities and services by active travel modes and public transport, the Site represents a logical and sustainable addition to Wombourne.



### The benefits of the proposal include:

- The delivery in the 32 new dwellings - including 10 affordable homes - to boost housing delivery at a sustainable location of growth within the District;
- A mix of energy efficient house types and sizes, ranging from 2-5 bedroom homes and including bungalows, family homes and houses ideal for first time buyers, catering for varied needs;
- Retention and enhancement of existing landscaping features around the Site, including boundary trees and hedgerows;
- Providing new landscaping including additional tree planting and areas of open space;
- On-site habitat enhancements and creation, and off-site contributions, to deliver a biodiversity net gain;
- Improved cycle and pedestrian connectivity through the Site, including a new footway link providing pedestrian connectivity to Orton Lane;
- Future-proofing potential connections to the draft allocated land to the north, ensuring the proposals do not preclude future development;

- Contributions to existing public open space facilities in Wombourne, delivering benefits for both new and existing residents in the local area;
- Planted SuDs features including a swale and basin to deliver ecological and amenity benefits, in addition to management of surface water;
- The provision of Electric Vehicle (EV) Charging Infrastructure for all new dwellings;
- The ability to deliver exemplar design standards through built form and green infrastructure allowing both new and existing residents the opportunity to live, work and play; and
- Direct, indirect and induced jobs created through the construction of the development, stimulating the local economy.

**Bellway**



### About Bellway

Bellway Homes Limited is a national housebuilder, having achieved 5-star builder status in the national Home Builders Federation (HBF) awards for seven years running. The company is committed to playing its part in meeting the national housing demand by delivering new high-quality communities in sustainable locations.



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## **Appendix 8: Planning Statement**

# **Land West of Orton Lane, Wombourne**

## **Planning Statement**

March 2024



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### Contact

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29<sup>th</sup> [February](#) 2024

# Introduction

- 1.1 This Planning Statement has been prepared by Turley in support of a Full Planning Application submitted on behalf of Bellway Homes Limited (West Midlands) (“the Applicant”), for the development of 32 homes on land west of Orton Lane, Wombourne. The site lies within the administrative boundary of South Staffordshire District Council.
- 1.2 A site location plan is enclosed within **Appendix 1**.
- 1.3 The applicant for the scheme, Bellway Homes Limited (West Midlands), has recently delivered schemes elsewhere within South Staffordshire at Cheslyn Hay and more widely in Staffordshire at Stafford, Hednesford and Gnosall.

## The proposed development

- 1.4 The proposed development seeks the erection of 32 high quality new homes, including bungalows and 31% affordable housing, a new access off Orton Lane, landscaping, and drainage, on a site to the north of Wombourne. The site is safeguarded in the adopted South Staffordshire Core Strategy (Site Allocations Document (SAD) **Policy SAD3**) and subject to a proposed allocation in the emerging Local Plan (**Policy SA5**).
- 1.5 The description of development (“the Proposed Development”) is as follows:

*“Full planning application for the erection of 32 dwellings, access from Orton Lane, landscaping and other associated works.”*

## Key scheme benefits

- 1.6 As outlined within this Planning Statement and across the submission, the proposed development will deliver several key benefits to the local area. These include the following:
  - Provision of 32 high-quality dwellings in a sustainable location.
  - Provision of 31% affordable homes on the site, of a range of tenure types to meet the needs of South Staffordshire.
  - Inclusion of both market and affordable bungalows and a mix of house sizes and types – adding choice and competition to the local housing market.
  - Economic benefits during and beyond the construction period which will boost and sustain the local economy.
  - Enhancing connectivity in the wider area through provision of new pedestrian routes, knitting the site into the wider area and the adjacent land parcel.
  - Net Zero ready homes, designed in accordance with the 2025 Future Homes Standard, making them energy efficient.

- Providing enhancements to existing habitats on site, through supplemental planting, a comprehensive landscape strategy, and tree retention, where possible.
- Delivery of a sustainable drainage solution for the site that will manage and mitigate the risk of flooding and climate change.



## 2. The Site and Surroundings

- 2.1 This section provides a detailed description of relevant aspects of the application site and surrounding context. An overview of the relevant planning history is also provided.

### Site Context and Location

- 2.2 The site comprises 1.76ha of grassed land to the west of Orton Lane and north of the village of Wombourne. It encompasses a rectangular field parcel, used for grazing.
- 2.3 The topography of the site rises 3m from the eastern boundary of the Site, at Orton Lane, towards the centre of the site; before falling 3m towards the western boundary of the Site.
- 2.4 The immediate site boundaries are formed of trees, hedgerow, and shrubs. Along the southern boundary, the rear gardens of residential properties off Connaught Drive and Strathmore Crescent back out onto the site, comprising fences and hedges.
- 2.5 The site is bound by Orton Lane to the east, providing direct access into Wombourne village, by foot, cycle, and vehicle, whilst horse grazed pastures extend to the north and west. The Public Right of Way (PROW). "Wombourne 23", extends along the western boundary of the site (outside of the application site), connecting Bratch Lane to the south and Orton Lane to the north. There is an extensive local network of PROW's including the South Staffordshire Railway Walk and Staffordshire and Worcestershire Canal towpath, to the west of the site.
- 2.6 In the surrounding context, the Site is flanked to the south and east by residential development which currently forms the northern edge of the settlement of Wombourne. To the south, the houses comprise of 2 storeys detached and single storey semi-detached dwellings, all of which back onto the Site. To the east is a series of large 2 storey detached dwellings set back from Orton Lane with large front gardens.

### Accessibility

- 2.7 The site is located to the immediate north of the village of Wombourne. Orton Lane situated to the east of the site and providing the existing and proposed site access, provides direct pedestrian, cycle, and vehicular access to the village centre, which is only 1.5km from the site.
- 2.8 In the immediate vicinity of the site, (800m/10-minute walking distance in line with MfS Guidance) there is a café, youth group centre, Bratch Park and bus stops along Bull Meadow Lane, the closest being within 650m of the site (see figure 4.1 of the supporting Transport Statement). These provide access to services on the 15 and 16 bus routes, every 30 minutes to the settlements of Merry Hill, Swindon, Wombourne, Wolverhampton and Stourbridge.
- 2.9 In the wider vicinity of the site, (2km /25-minute – the preferred maximum walking distance) there is a day nursery, two primary schools and a secondary school (Wombourne High School). There are also a number of further amenities including a

dentist, doctor's, convenience store, leisure centre and pharmacy (see figure 4.2 of the supporting Transport Statement).

- 2.10 In line with the DfT July 2020 guidance, a 15-minute cycle distance is considered to be a comfortable distance, from the site this provides access to the entirety of Wombourne and surrounding areas of Trysull, Lower Penn, Smestow and Swindon and their associated services, facilities, and employment opportunities (see figure 4.4 of the supporting Transport Statement). There are a number of advisory cycle routes within close proximity of the site, to provide access to Wombourne Centre, including the traffic free South Staffordshire Railway Walk route.
- 2.11 The site has excellent off-road pedestrian and cycle links to industrial and commercial employment opportunities in south Wombourne, as well as the village centre. The site is in close proximity to the South Staffordshire Railway Walk which provides long distance dedicated pedestrian and cycle connectivity as well as the nearby bus stop at Bull Meadow Lane.
- 2.12 The site is clearly accessible by a variety of sustainable transport modes and is therefore considered a suitable and sustainable location for development.

### **Environmental Designations/Constraints**

- 2.13 The site does not comprise any heritage, landscape or environmental designations which would restrict or preclude development of this site, as demonstrated by the suite of technical reports and assessments submitted with this application, which also set out mitigation measures as required.
- 2.14 In addition, the site lies fully within Flood zone 1 and is therefore not considered to be at risk of fluvial flooding. The Flood Risk Assessment and Drainage Strategy submitted with this application sets out how surface water will be managed on site (lowest level of risk).

### **Planning Policy Context**

- 2.15 The site was allocated in accordance with **Policy SAD3** as "Safeguarded Land for Longer Term Development Needs" by the adopted Site Allocations Document (SAD). In order to meet development needs over the plan period or released through an early plan review. Given this designation, the policy removes the site from the Green Belt and retains it as "safeguarded land" until a review of the Local Plan proposes development of these sites, in whole or in part.
- 2.16 The site has since been included as part of a proposed allocation with land directly adjacent to the north under **Policy SA5** within the latest version of the Publication Plan – Pre-submission (2022), as part of the emerging Local Plan Review, for a minimum of 79 homes across both sites. Associated promotional work has been undertaken historically, in order to reach this proposed allocation stage.
- 2.17 We discuss planning policy and the development plan further at Section 4.

**Planning History**

2.18 The site has no notable planning history.



### 3. Pre-application Consultation

- 3.1 Highways pre-application advice was initially sought in 2021 from Staffordshire County Council by Ardent on behalf of the applicants to inform the proposed access arrangements from Orton Lane. The proposed development at that time comprised circa 50 dwellings. The response from County, included at **Appendix 2** of this statement, informed the location and design of the vehicular and pedestrian/cycle access serving the proposed development.
- 3.2 Following this, a planning pre-application enquiry was submitted to South Staffordshire Council on 17<sup>th</sup> February 2023, requesting advice on a proposed planning application for the erection of circa 45 dwellings, associated works and an access from Orton Lane (Ref: 23/00016/PREAPP).
- 3.3 A pre application meeting was held with officers on 20<sup>th</sup> April 2023 with their full advice note being issued on 21<sup>st</sup> July 2023 (**Appendix 3**), a summary of the key points is as follows:
- The council supported the proposed approach to submitting an application in accordance with the emerging local plan policies, to come forward in line with the Publication Plan and Examination timescales.
  - The council were expecting that a planning application for the site would include the whole of the emerging allocation. Officers emphasised the importance of planning comprehensively. Although the northern and southern parts of the emerging allocation is controlled by different landowners/promoters, the design of the development proposed by Bellway has sought to ensure there could be future pedestrian/vehicular connections from the southern part of the site to the northern parcel. There has also been a degree of collaboration between the parties through the sharing of plans and representations to the emerging local plan.
  - The council requested the 30% affordable housing provision as part of the emerging planning policies, with a tenure split of 25% first homes, 25% shared ownership and 50% social rent, which the applicant has taken on board and broadly complied with. The council recommended that the affordable housing should be evenly distributed across the site, ensuring it is tenure blind. This has been incorporated through the evolution of the proposed development.
  - The council requested the housing mix would have 70% of properties as 3 bed or less, in line with the emerging policy. The proposal was amended to reflect this. With 85% of the units across the site being 3 bed or less and 68% when looking at the market units exclusively. The council also expected that 10% of both market and affordable properties were bungalows, in response 10% of the affordable units are bungalows and 9% of the market units. It should be noted that the emerging policy does not stipulate this 10% figure.

- The council requested compliance with Part M4(2) building standards and the NDSS for all properties. This request has been incorporated into the proposal and all house types are compliant.
- The council suggested further changes to the site layout due to issues with plot siting, housing mix, links to the northern land parcel, over-reliance on frontage parking and potential shortfall of POS. These changes have been reflected in the latest planning layout.
- The council requested clarity between the POS areas and those to be used for habitat creation purposes and highlight the dual use potential for the infiltration basin to be used for both drainage and BNG purposes.
- The council requested that a shadow HRA be submitted with any future application given the current holding objection from Natural England to the likely effects of nitrogen disposition from development traffic. This has been provided as part of the application package.
- The council requested an Energy and Carbon Statement, setting out how the scheme will achieve net zero regulated emissions and energy efficiency improvements. This has been provided as part of the application package.

3.4 The Pre-Application advice from Staffordshire County Council Highways Authority and South Staffordshire Council has been taken into consideration during the evolution of the proposed development. In part, this has resulted in a reduction in the quantum of development proposed and informed the type, size, design, and tenure of homes incorporated.

## 4. The Proposed Development

- 4.1 This section provides a detailed description of the proposed development. Further details are also provided within the application plans and drawings, and the Design and Access Statement, prepared by Edge Urban Design.
- 4.2 This application seeks full planning permission for the erection of 32 dwellings, access from Orton Lane, landscaping, and other associated works at land west of Orton Lane, Wombourne.
- 4.3 The development comprises the following principal components:
- A total site area of 1.76ha
  - Residential development of 32 homes
  - 31% affordable housing provision (10 units)
  - Provision of bungalows, 2 x market (9% provision) and 1 x affordable (10% provision)
  - Primary vehicular, pedestrian/cycle access off Orton Lane
  - Pedestrian and cycle only route along the northern edge of the site
  - EV charging points for all new dwellings.
  - Potential future pedestrian/vehicular connections to the northern extent of the proposed allocation.
  - Contribution to existing open space facilities in Wombourne.
  - On site habitat creation, landscape feature retention where possible, supplemental planting across the site and offsite contributions to provide 10% BNG.

### Key Design Principles

- 4.4 The topography of the site has dictated the proposed surface water drainage strategy which includes attenuation being provided in the north western and south eastern corners of the site. The south eastern corner of the site also provides an opportunity for habitat creation.
- 4.5 Tree and landscape planting is proposed to frame the primary road, travelling east to west through the centre of the site.
- 4.6 A pedestrian/cycle route is proposed along the northern edge of the site, with a potential opportunity for this to link with the site to the north, and travel to the primary road at the centre of the site.



- 4.7 The proposals provide a mix of market housing and policy compliant provision of affordable housing in a sustainable location. The site would provide 31% affordable housing with a well-balanced mix ranging between 2–5-bedroom properties, all incorporating an energy efficient design.
- 4.8 The layout of the site and internal roads have been designed to ensure connectivity to land to the north, within the same proposed allocation, is provided.

### **Mix and Tenure of Dwellings**

- 4.9 The mix and tenure of dwellings includes bungalow provision (10% of both market and affordable units) and ensures that 75% of the dwellings are 3 bed or less.

### **Affordable Housing**

- 4.10 The proposals include the provision of 31% affordable housing. The proposed tenure mix is as follows: 50% social rent 30% first homes 20% shared ownership tenure mix.

### **Appearance and Detail**

- 4.11 Bespoke house types are proposed which use a mixed palette of complementary materials to ensure there is variety and visual interest within the proposals and that they remain attractive throughout the lifetime of the development.
- 4.12 Properties towards the east of the Site are proposed to be red multi brick with a grey roof tile. Towards the west, properties will be orange multi brick with a brown roof tile, creating a transition in character and identity. Render is used for key corners and landmark buildings, helping to aid wayfinding through the Site, creating variety and interest.
- 4.13 Rainwater goods are proposed in black uPVC throughout.
- 4.14 Block paving in red brindle laid in a herringbone pattern is proposed to break up areas of hardstanding, highlight road narrowings, at the gateway to the Site and for areas of frontage parking.

### **Access and Parking**

- 4.15 The primary access point will be from Orton Lane, with two dedicated pedestrian and cycle connections. To ensure that land to the north can come forwards without prejudice, the access proposals have been designed in line with requirements for a “major residential access road”, sufficient to serve a proposed development of up to 300 dwellings – significantly higher than the minimum 79 dwelling requirement of the proposed allocation and 32 unit provision of the current proposal.
- 4.16 Parking provision has been based on the current guidance, as set out within the South Staffordshire Council Core Strategy (2021). The proposal includes of 73 parking spaces, which are in line with these standards and include a single extra space, to prevent on-street parking occurring within the site.

- 4.17 The majority of parking are provided on plot to the side of the dwellings, though some on-street allocated bays have been included, frontage parking has been kept to a minimum where possible. Each dwelling will have a single fast charge socket located on a parking space within the property's curtilage.
- 4.18 Cycle parking spaces have been included within garages where they have been provided, dwellings without garage provision have cycle storage space located in a secure shed, in an accessible rear garden. In line with the emerging Local Plan Review, one cycle space per dwelling minimum has been provided.

### **Landscape Trees and Ecology**

- 4.19 The proposals include the provision of new trees to streets and areas of public open space, in addition to the retention of existing boundary planting, to create green streets and spaces.
- 4.20 Areas of meadow grassland, in addition to amenity grass provide biodiversity benefits.
- 4.21 The infiltration basin and swale will support a sustainable drainage approach. The SuDS will feature planting, ensuring that they are not only beneficial for drainage purposes but will also provide water quality and ecological benefits, strengthening the diversity of landscape typologies within the proposal. This includes a wetland grass mixture and marginal /aquatic planting.
- 4.22 A recreational route creates a pedestrian / cycle loop around the north of the Site, adjacent to the existing tree belt through areas of meadow and amenity grassland ensuring a green edge to the development.

### **Sustainability**

- 4.23 Sustainability is an important consideration of the proposal. The development has undertaken a fabric first approach to the development to optimise the performance of the components and materials of the building fabric, resulting in improved energy efficiency and a reduction in carbon emissions.
- 4.24 It proposes the use of Air Source Heat Pumps (ASHPs) and solar PV to reduce grid energy demand, helping mitigate the effects of climate change and reducing carbon emissions in line with the 2025 Future Homes Standard, achieving a 75% carbon reduction beyond Part L 2013.
- 4.25 The proposal also includes for the provision of EV charging provision in line with local policy requirements, with a charging point per house.

## 5. The Development Plan and Material Considerations

- 5.1 This section provides a summary of the key planning policies of relevance to the determination of this outline planning application. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), this application is to be determined in accordance with relevant policies of the adopted development plan, unless material considerations indicate otherwise.
- 5.2 In this case the development plan comprises the South Staffordshire Core Strategy (2012), Site Allocations Document (SAD) (2018) and First Homes Interim Policy Statement (2022). It also comprises made Neighbourhood Development Plans (NDP) however, the site is not included within an area which has a made NDP at this time.
- 5.3 Other material planning policy considerations include:
- The emerging Local Plan Review (Publication Plan 2022)
  - Further policy guidance documents (Design Guide SPD 2018, Sustainable Development SPD 2018)
  - The NPPF (December 2023 as amended)
  - NPPG (2016 – as amended)

### The Development Plan

- 5.4 The South Staffordshire Core Strategy was adopted in 2012 after the introduction of the NPPF in March of the same year. The Core Strategy provides the framework to the SAD (2018).
- 5.5 **Policy GB2** “Land Safeguarded for Longer Term Needs” of the adopted Core Strategy, identified that additional safeguarded land will be identified in the Site Allocations DPD for housing and employment development for the period 2028 – 2038.
- 5.6 Further relevant policies for the consideration of this application from the Core Strategy are as follows:
- 5.7 **Policy EQ1** – Protecting, Enhancing and Expanding Natural Assets
- 5.8 **Policy EQ4** – Protecting and Enhancing the Character and Appearance of the Landscape
- 5.9 **Policy EQ5** – Sustainable Resources and Energy Efficiency
- 5.10 **Policy EQ9** – Protecting Residential Amenity
- 5.11 **Policy EQ11** – Wider Design Considerations
- 5.12 **Policy EQ12** – Landscaping



- 5.13 **Policy H1** – Achieving a Balanced Housing Market
- 5.14 **Policy H2** – Provision of Affordable Housing
- 5.15 **Policy H4** – Delivering Affordable Housing
- 5.16 **Policy EV11** – Sustainable Travel
- 5.17 **Policy EV12** – Parking Provision
- 5.18 **Policy EQ13** – Development Contributions
- 5.19 The site was then allocated in accordance with **Policy SAD3** as “Safeguarded Land for Longer Term Development Needs” by the adopted SAD, in order to meet development needs over the plan period or released through an early plan review. Given this designation, the policy removes the site from the Green Belt and retains it as “safeguarded land” until a review of the Local Plan proposes development of these sites, in whole or in part.

### **The Emerging Local Plan Review**

- 5.20 South Staffordshire began a Local Plan Review in 2018, guiding development from 2018 – 2039. It is currently at pre-submission stage, however as of July 2023 it was paused, pending clarity from the Government on the proposed changes to the National Planning Policy Framework (NPPF). Following the publication of the revised NPPF in December 2023, the council are now aiming for a new Regulation 19 public consultation on a revised strategy to be ready in late spring 2024. However, members have yet to fully discuss and agree the proposals so there is no firm date set at this time.
- 5.21 The entirety of the site identified by the adopted SAD as safeguarded land is proposed for allocation in the emerging local plan as established by emerging **Policy SA5**, this also include additional land fronting on to Orton Lane. The proposed housing allocation has a minimum capacity of 79 dwellings. The site, which is the subject of this planning application, comprises the southern part of the proposed allocation off Orton Lane, with the northern part of the proposed allocation falling outside of the Applicant’s control. This notwithstanding, the proposed development has been designed to ensure connectivity to the northern parcel could be provided in the future should that development come forward.
- 5.22 As a result of the current status of the application site, comprising safeguarded land, it is anticipated that it would be determined following the adoption of the emerging Local Plan in due course. To enable this to occur in the timeliest manner, the proposals have been designed to accord with the emerging Local Plan Review policies and are being submitted ahead of any future examination to support the emerging plan and demonstrate the deliverability of the site. This approach has been agreed with the local planning authority.
- 5.23 The key emerging policies which this proposal is to be assessed against are:
  - **Policy HC1** – Housing Mix

- **Policy HC3** – Affordable Housing Requirements
- **Policy HC4** - Homes for older people and others with special housing requirements
- **Policy HC10** – Design Requirements
- **Policy HC12** – Space About Dwellings and Internal Space
- **Policy HC13** – Parking Standards
- **Policy HC17** – Open Space
- **Policy HC19** – Green Infrastructure
- **Policy NB7** – Managing Flood Risk, SuDS, and Water Quality

## Material considerations

### Supplementary Planning Guidance

#### *Design Guide SPD (2018)*

5.24 This document demonstrates the key concepts for allowing neighbourhood integration, creating a sense of place, streets, and home design. It seeks to promote good design in new development which reflects the diversity of the villages in South Staffordshire and wider rural areas.

#### *Sustainable Development SPD (2018)*

5.25 This document contains many themes including sustainable transport, energy efficiency, biodiversity, sustainable drainage systems and waste management and includes a Householder Guide to Renewable Energy.

### National Planning Policy

5.26 The most important paragraphs of the National Planning Policy Framework (NPPF) (December 2023 as amended) are summarised below:

- **Paragraph 11** sets out the approach to decision making for planning applications.
- **Paragraph 48(a)** describes the situations where relevant policies in emerging plans can be given due weight, according to the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given).
- **Paragraph 60** seeks to support the Government’s objective of **significantly boosting the supply of homes**, it is important that a sufficient amount and variety of land can come forward **where it is needed**, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- **Paragraph 64** requires that where a need for **affordable housing is identified**, this is expected to be **met on site**.

- **Paragraph 96** sets out that to **achieve healthy, inclusive and safe places** and beautiful buildings, planning decisions should ensure that developments, promote social interaction (a), are safe and accessible (b) and enable and support healthy lifestyles, through the provision of accessible green infrastructure and layouts which encourage walking and cycling.
- **Paragraph 114** seeks to ensure that on potential allocated sites and for new applications for development, **appropriate opportunities to promote sustainable transport modes can be – or have been – taken up**, given the type of development and its location (a) and safe and suitable access to the site can be achieved for all users (b).
- **Paragraph 116** goes into further detail that for development applications, should give **priority to pedestrian and cycle road users** (a), address the needs for disabled and reduced mobility in relation to all transport modes (b), prevent conflicts and clutter between various road users (c) and be **designed to enable charging of plug-in and other ultra-low emission vehicles** in safe, accessible and convenient locations (e).
- **Paragraph 131** notes the importance of **good design, as a key aspect of sustainable development**.
- **Paragraph 135** expands on this, noting that developments should, be **functional and add to the overall quality** of an area – for its lifetime (a), visually attractive (b), **sympathetic** to local character (c), establish a **sense of place** (d), **optimise** the potential of the site for development (e), safe, accessible and inclusive – to **promote health and wellbeing** (f).
- **Paragraph 159** states that new development should be planned for in ways to **avoid increased vulnerability to** the range of impacts arising from **climate change** (a) and can **help to reduce greenhouse gas emissions**, such as through its location, orientation and design. Any **local requirements** for the sustainability of buildings **should reflect** the Government’s policy for **national technical standards** (b).
- **Paragraph 180** provides guidance on how planning decisions should contribute to and enhance the natural and local environment by, minimising impacts on and **providing net gains for biodiversity**, including by establishing coherent ecological networks that are more resilient to current and future pressures (d).

## CIL

5.27 South Staffordshire do not have an adopted CIL and therefore all developer contributions will be funded solely via S106 agreements.



## 6. Planning Analysis

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of this full planning application be made in accordance with the development plan, unless material considerations indicate otherwise.
- 6.2 Starting with the principle of the proposed development in the context of local and national planning policy, this section demonstrates that the scheme, as a whole, represents sustainable development and is in direct accordance with the policies contained in both the adopted Core Strategy and SAD, along with the emerging Local Plan Review. Determination of this application is anticipated to coincide with the adoption of the emerging Local Plan. This notwithstanding, the below analysis demonstrates that the proposed development is policy compliant, in line with paragraph 11c of the NPPF, and should therefore be approved without delay.

### Principle of Development

- 6.3 The site is situated directly adjacent to the northern boundary of Wombourne village, identified as a “Main Service Village” at the top of the settlement hierarchy and one of the main locations for housing growth in South Staffordshire, as set out under **Policy 1** of the adopted Core Strategy. Such locations are the focus for additional safeguarded land proposed under **Policy GB2** of the adopted Core Strategy, in order to protect the Green Belt and facilitate site allocations for long term development needs, in a District where 80% of the land falls within the Green Belt Designation.
- 6.4 **Policy SAD3** of the SAD further supports the safeguarded land proposals, specifically including the site (ref: Wombourne [d]) as land to be safeguarded and removed from the Green Belt, for further development needs from 2028 – 2038 or as released through an early Local Plan Review. Applications for development on safeguarded land prior to their allocation in a future Local Plan Review, are regarded as departures from the plan.
- 6.5 As part of the emerging Local Plan Review, Wombourne continues to be an area of focus for growth into the future. Though it is noted that it is now proposed as a “larger village” or Tier 2 settlement in **Policy DS5** of the emerging Local Plan Review. Though this is a reduction from a Tier 1 to Tier 2 settlement, compared to the adopted policy, such settlements are still considered to contain a wide range of services and facilities and are suitable for housing growth.
- 6.6 The site is proposed to be allocated as part of emerging **Policy SA5** of the Local Plan Review, under site reference 416/416a, for a minimum of 79 dwellings. The proposal site represents the southernmost parcel of this proposed allocation. Following pre application discussions and extensive technical work, a proposed development for 32 dwellings has been prepared, with potential for connections to the wider northern part of the allocation included. This will allow for the remaining dwelling numbers to be delivered without prejudice, on the northern part of the allocation, but they cannot be included within this application as the site falls outside of the applicant’s control. **Paragraph 48(a)** of the NPPF describes the situations where relevant policies in emerging

plans can be given due weight, according to the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given).

## Housing Delivery

- 6.7 **Paragraph 60** of the NPPF sets out the government's objective to "significantly boost" the supply of housing, with small and medium sized sites providing an effective contribution to achieving this. The proposal can directly contribute to this, on a safeguarded site, located outside of the Green Belt.

## Housing Mix and Tenure

- 6.8 The proposal is for 32 units the accommodation is split between 2, 3, 4 and 5 bed dwellings. As a whole 75% of the properties are 3 bed or less, to help boost the provision of smaller sized units in the district. This is in line with **Policy H1** of the adopted Core Strategy, which encourages the provision of more 2 and 3 bed homes across all housing market areas. This policy also seeks to ensure the provision of high-quality housing choice within the district, which the proposal accords with, given its mix in unit size, type, and tenure, including bungalows, assisting the need to providing homes for the ageing population.
- 6.9 Emerging **Policy HC1** also focuses on the provision for smaller sized (3 bed or less) homes, it requires 70% of market dwellings on major development sites to fall within this category, in this instance, the proposal broadly aligns with this percentage with 68% of the market unit provision being 3 bed or less.
- 6.10 The proposal includes for 31% affordable housing provision, equalling 10 homes.
- 6.11 The latest SHMA (2022) demonstrates an annual affordable housing need of 67 units, which is 28% of the standard method figure for the district of 241 units, this excludes the additional 4,000 units planned to be delivered in South Staffordshire, to meet the unmet needs of the Greater Birmingham HMA. Paragraph 8.7 of the report states:
- 6.11.1 *"Based on the evidence in this report, it is recommended that the Council sets a target of 30% of all new housing as affordable on all new sites that meet the minimum dwelling threshold. The Council can therefore be confident that the affordable housing need identified in the model will be addressed by the dwelling growth identified by the Standard Method and no adjustment is required to this figure."*
- 6.12 The 31% affordable housing provision onsite, is therefore considered to be compliant with the latest local affordable housing need evidence, and by extension adopted **Policy H2**. This is also supported by **paragraph 64** of the NPPF, which requires that where a need for affordable housing is identified, this is expected to be met on site. It also accords with emerging **Policy HC3** which requires 30% affordable housing provision.
- 6.13 Adopted Core Strategy **Policy H2** proposes a 50% social rent and 50% intermediate tenure mix for affordable housing. A mix which the proposal directly accords with this being for 50% social rent, 30% first homes and 20% shared ownership. Emerging **Policy**

**HC3** requires a similar affordable housing tenure breakdown of 50% social rent, 25% first homes and 25% shared ownership, the proposal broadly aligns with this tenure mix.

- 6.1 The 10 affordable homes included as part of the proposed development have been designed to integrate into the development, to ensure the scheme is “tenure blind”, in line with Core Strategy **Policy H4**, which requires affordable units to be fully integrated into the development and secured in perpetuity. This requirement is also reflected in emerging **Policy HC3**, which requires new development to contribute towards mixed and sustainable communities, therefore requiring affordable housing to be provided on site and fully integrated with market housing.
- 6.2 In recognition of the population’s age profile being older than the national average (SHMA 2022), the proposal includes for 9% of the market (2 units) and 10% affordable dwellings (1 unit) as bungalows. This aligns with adopted Core Strategy **Policy H1** which requires the housing mix to account for the needs of the ageing population and the pre-app comments provided by the LPA. It also accords with emerging **Policy HC4**, which requires all major housing developments to demonstrate how the proposal clearly contributes to meeting the needs of older and disabled people including through the provision of bungalows. **Paragraph 60** of the NPPF also provides further support for this bungalow provision, as it requires that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 6.3 Overall, the proposals broadly align with the policy requirements of both the adopted and emerging local planning policies and the NPPF, which have dictated the size, mix and tenure of the proposed dwellings.

### **Landscape and Visual Impact and Public Open Space**

- 6.4 The LVIA submitted with this application demonstrates that the site is not covered by any statutory or non-statutory landscape designations and does not fall within the viewing corridor of any protected views. The trees and vegetation within the site are considered to be of low/ordinary value and so too is the wider landscape value of the site. The site is not considered to be a “valued landscape” in the context of **paragraph 180 (a)** of the NPPF.
- 6.5 The proposals will therefore have limited harm in terms of landscape and visual impact. Whilst they would result in the loss of open countryside, the impacts would be very localised and the landscape strategy will ensure that once the proposed planting is complete, there will be an increase in tree cover and length of hedgerows on site, in line with **Policy EQ4** of the Core Strategy
- 6.6 A detailed landscaping plan has been submitted with the application. In line with Core Strategy **Policy, EQ4 and EQ12** and emerging **Policy NB4**, the design and location of the proposed development has taken account of the characteristics and sensitivity of the landscape and its surroundings, and not have a detrimental effect on the immediate environment and on any important medium and long-distance views.

All trees and hedgerows have been retained where possible, especially, those of the most value (see Arboricultural Impact Assessment for tree/group/hedgerow



classifications). Any losses have been offset in a manner that complements the habitats within and character of the surrounding area, this has resulted in a net gain of 15.29% hedgerow units, as discussed further in the ecology section below. This aligns with **paragraph 180 (d)** of the NPPF, which requires development to contribute to and enhance the natural and local environment by, minimising impacts on and providing net gains for biodiversity.

- 6.7 Having regard to green infrastructure provision, in line with the detailed landscaping plan, the proposal has sought to maximise the network of accessible green and blue spaces, the site will become publicly accessible and introduce a dual-purpose SuDS and BNG feature, which also provides further visual amenity on the site, this is in accordance with Core Strategy **Policy EQ12** and emerging **Policy HC19**. This is further supported by **paragraph 175** of the NPPF, which requires all major developments to incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate and, where possible, provide multifunctional benefits (d).
- 6.8 In terms of public open space provision, due to the size of the site, in line with **Policy EQ13** of the Core Strategy, financial contributions will be made to the provision of new accessible public open space, play facilities and spaces and sport and recreation facilities to serve new residents or the enhancement of the quality and accessibility existing public open space, and sport and recreation facilities. The figure will be considered as part of discussions during the determination of the application. Such provisions are in accordance with **paragraph 34** of the NPPF, which support development contributions.
- 6.9 Indicatively, in line with emerging **Policy HC17**, as the proposal is for 32 dwellings and is restricted by its site size, financial contributions can be made which are comparable to the 0.006 hectares of multi-functional publicly accessible open space per dwelling as standard, towards existing local facilities. However, as set out above, this contribution is subject to further discussions as part of the application's determination.

## Ecology

- 6.10 There are no statutory ecological designations covering any part of the site.
- 6.11 An Ecological Impact Assessment was undertaken in support of this application, informed by the suite of surveys undertaken.
- 6.12 With the implementation of some straightforward mitigation and precautionary measures, the development is not anticipated to result in any significant residual negative effects on important ecological features on-site or offsite in reference to the nearby designations.
- 6.13 The Site Layout and Detailed Landscaping Strategy demonstrates the proposal has the potential to deliver net benefits for wildlife in the form of additional habitats and hedgerow planting, with the opportunity to provide additional biodiversity enhancement measures alongside the new housing. Opportunities for ecological enhancement may be secured by planning condition. New habitat creation is proposed to include grassland creation and wetland SuDS features, alongside delivery of a range of bird and bat boxes. This is in line with Core Strategy **Policies EQ1 and EQ11** which seek

to ensure development proposals build in biodiversity, incorporating ecologically sensitive design and features for biodiversity within the development scheme.

- 6.14 A Biodiversity Net Gain Calculation has determined that the proposed development could secure a net gain of 15.29% in hedgerow units (0.46 units). A net loss of habitat units has been calculated on-site, resulting in a loss of 3.67 habitat units, a -53.41% net loss. Biodiversity offsetting options are being explored for the Site with South Staffordshire Council, in order to compensate for losses in habitat units, given the small site size and high baseline score. This 10% BNG provision goes beyond the planning policy requirements at the time of writing but, it is now a mandatory requirement for major developments from the 12<sup>th</sup> of February 2024 (as introduced by the Environment Act 2021) as has therefore been included. The proposal is also in accordance with emerging **Policy NB2** and **paragraph 180 (d)** of the NPPF.
- 6.15 These measures are to be secured via appropriately worded planning conditions in relation to the provision of:
- Construction Environmental Management Plan (CEMP)
  - Landscape and Ecology Management Plan (LEMP)
  - Lighting Strategy

### **Arboriculture**

- 6.16 An Arboricultural Report has been prepared. The site survey identified 53 arboricultural features.
- 6.17 Two trees were considered to provide high visual amenity and are categorised as high-quality Category A trees, where retention is most desirable. Eleven trees and one group were considered to be of moderate quality Category B trees, where retention is desirable. Sixteen trees, thirteen groups and four hedgerows were classified as Category C trees, low quality trees which could be retained but should not constrain the proposal. Six trees were considered to be Category U trees, very poor quality, which should be removed unless they have high conservation value.
- 6.18 To facilitate the proposals, three very poor-quality trees are proposed to be removed. One to facilitate the access point on the eastern boundary and the further two due to being in such poor condition they could pose a future risk to the site. Three sections of low-quality group areas are also proposed to be removed, two of which are low quality hedgerow type species along the eastern boundary to further facilitate the pedestrian and vehicle access points. The third is a group of young trees which can be transplanted and may require partial removal to facilitate the infiltration swale to the west of the site, due to the potential change in levels of their Root Protection Areas (RPA).
- 6.19 The majority of the retained trees are located on the periphery of the site and therefore only a small collection of the tree stock will require facilitative pruning.
- 6.20 The loss of the category U dead-standing tree and sections of the tree group located on the eastern boundary are compensated by the indicative proposed planting of

approximately thirty new trees within the open landscaped areas. In arboricultural terms the proposed development has the potential to deliver an enhancement. This is in recognition of **paragraph 136** of the NPPF, which notes the important contribution trees make to the character and quality of urban environments, and can also help mitigate and adapt to climate change

- 6.21 The retained trees can be adequately protected during construction activities to sustain their health and longevity. This is in further accordance with **paragraph 136** of the NPPF, which requires existing trees to be retained wherever possible.
- 6.22 The proposal is feasible from an arboricultural perspective, and if carefully implemented according to an approved arboricultural method statement there would be no or only a low potential negative impact on the retained trees, in accordance with Core Strategy **Policy EQ4**, emerging **Policy NB4** and **paragraph 136** of the NPPF.

## Heritage

- 6.23 As set out in the supporting Heritage and Archaeological Assessment which accompanies this application, the Site does not contain any designated heritage assets, as defined in **Annex 2** of the NPPF and so therefore the implementation of the development proposals would not give rise to any 'direct' impacts in that respect.
- 6.24 The Site also does not form part of the setting of any of the heritage assets which are present and equally it does not contribute in any way to their heritage significance. Furthermore, it is unlikely that the implementation of development proposals for the Site would give rise to 'indirect' impacts on heritage assets beyond the boundaries as a result of changes within their wider setting.
- 6.25 In terms of non-designated heritage assets, the Site does not include any locally listed assets, nor does the Site form any part of the setting which contributes to the significance of any such assets within the wider landscape. No non-designated heritage assets of local interest are likely to be adversely affected by the approval and implementation of the proposed development.
- 6.26 In terms of non-designated archaeology, the Site is identified as having a very low potential to contain significant archaeological remains from the prehistoric and Roman periods. It is also assessed to have a very low potential for the Site to contain significant archaeological remains from the medieval to modern periods, beyond features related to agricultural practices during this period which would be of negligible value.
- 6.27 It is concluded that there is no reason to believe that the Site contains archaeological remains that would be of such significance as to warrant physical preservation in situ. Instead, their conservation, should any be found (comprising preservation by record), could be appropriately addressed through a phased programme of archaeological investigations, the scope of which would be agreed with the archaeological advisor to the LPA, as required. Given the very limited archaeological potential of the Site, it is considered that this is not a determinative matter and could be appropriately and proportionately dealt with through the imposition of an appropriately worded planning condition on any planning permission which is granted.



6.28 The assessment concludes that in terms of designated and non-designated heritage assets, the planning proposals are considered to comply with the relevant paragraphs of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF, and relevant policies within the adopted (**Policy EQ3**) and emerging (**Policy NB8**) South Staffordshire Local Plan.

## Design

6.29 The NPPF explains that good design is a key aspect of sustainable development and that developments should function well and add to the overall character of the area (**paragraph 131**).

6.30 **Paragraph 135** expands on this, noting that developments should, be functional and add to the overall quality of an area – for its lifetime, visually attractive, sympathetic to local character, establish a sense of place, optimise the potential of the site for development, safe, accessible and inclusive – to promote health and wellbeing.

6.31 Adopted **Policy EQ11** looks at the wider design considerations of development, including the protection of residential amenity. Please see the supporting Design and Access Statement prepared by Edge Design in support of the current application. The key design considerations which have been incorporated into the proposal in line with this policy and the wider NPPF considerations are as follows:

- Promoting a density and mix appropriate to the development's setting – all new dwellings are 2 storeys or less in height, with the bungalow units located to the west to create a soft transition to the land beyond and in response to the existing bungalows on Connaught Drive. The density of the development makes efficient use of the site, whilst ensuring appropriate separation distances from existing dwellings to the south and reflecting the more rural nature of the site.
- Ensuring a choice of movement routes to access and within the development site, for all road users – both primary and secondary streets are included, which are tree lined where appropriate, the latter allowing future connections to the northern land parcel which forms part of the proposed allocation in the emerging plan in future.
- Provision of safe and attractive walking and cycling conditions – towards the north of the site a recreational route creates a looped pedestrian/cycle route promoting active travel and connecting to the countryside beyond.
- Amenity considerations and protections for both existing and future residents (in line with Core Strategy **Policy EQ9**) including natural surveillance and appropriate space about dwellings.
- Retention and enhancement of existing landscape features and habitats – tree lined streets are proposed along with supplemental planting to the site's boundaries, offsetting any losses for access etc, a SuDS feature is also proposed strengthening the diversity of landscape typologies within the proposal and contributing to the 10% BNG provision.

- In built sustainability principles, including renewable energy use and the reduction of waste, layout, and orientation to maximise on natural cooling and heating along with the use of SuDs, the proposals are designed to be Net Zero Carbon ready, all dwellings have an EVC included, and the site is sustainably located to ensure access by a range of sustainable transport modes.
- 6.32 Emerging **Policy HC10** also requires a high standard of design and layout in all developments to ensure the creation of safe, inclusive, and attractive schemes.
- 6.33 The proposals demonstrates that the Site can deliver 32 new high-quality homes, including 10 affordable homes, set within green streets and enhanced boundary planting. The inclusion of tree lined primary streets particularly reflects the requirements of emerging **Policy HC10 (c)** and **paragraphs 131 and 96** of the NPPF. The latter of which sets out that to achieve healthy, inclusive and safe places and beautiful buildings, planning decisions should ensure that developments, promote social interaction, are safe and accessible and enable and support healthy lifestyles, through the provision of accessible green infrastructure and layouts which encourage walking and cycling. All of which the proposal can demonstrate, as set out in the paragraphs below.
- 6.34 The dwelling densities, design and materials have drawn direct influence from the surrounding vernacular, whilst creating their own sense of place and utilising the materials composition to add variety and provide wayfinding routes through the development, with key building placement and colours, in line with emerging **Policy HC10 (b)(d) and (e)**.
- 6.35 The Site layout has been sensitively designed to retain existing landscape features including trees and hedgerows to the Site boundaries (where possible) and provide potential future connections to the draft allocated land to the north of the Site.
- 6.36 The homes will be set within an improved and enhanced landscape that will include additional tree planting along the primary access routes to the Site and areas of open space, offering dual benefits of visual amenity and biodiversity net gains.
- 6.37 The access to the Site will be designed to create a landscaped gateway, framed by existing vegetation along Orton Lane. On entering the Site, properties overlook an area of green space and a landscaped SUD which creates an attractive feature. Dual aspect dwellings create a strong frontage on to the primary street and ensure passive surveillance of the public realm in line with emerging **Policy HC10 (o)**.
- 6.38 New homes will be set back from the Site's boundaries with existing neighbours, ensuring the proposals sensitively integrate into the surroundings.
- 6.39 Car and cycle parking does not dominate the street scene and is positioned to the side of dwellings in the majority of cases, cycle parking is included within garages or garden sheds in rear gardens, in line with emerging **Policy HC10 (p)**.
- 6.40 Bespoke house types are proposed which use a mixed palette of complementary materials to ensure there is variety and visual interest within the proposals. This is an approach taken across the site regardless of tenure to ensure a socially inclusive, tenure neutral development in line with **Policy HC10 (e) and (p)**.

- 6.41 The proposals are therefore considered to represent high quality design, in accordance with **adopted Policy EQ11, emerging Policy HC10 and chapter 12 of the NPPF**.

### **Flood Risk and Surface Water Drainage**

- 6.42 The submitted Flood Risk Assessment and Drainage Strategy identifies that the site is located within Flood Zone 1 and is therefore at low risk of flooding. Surface water drainage on site will be via a combination of swales and an attenuation basin, whilst foul drainage will be via a new connection to be agreed with Severn Trent Water.
- 6.43 The surface water drainage strategy and supporting documentation illustrates that sustainable drainage systems will be used, and that with the incorporation of appropriate drainage and attenuation measures, there are no overriding reasons why the development proposals should not be approved on flood risk or drainage grounds, in line with adopted **Policy 3** emerging **Policy NB7** and **paragraphs 173 and 175** of the NPPF.

### **Transport and Access**

- 6.44 **Paragraph 115** of the NPPF states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe or there is an unacceptable impact upon highway safety.
- 6.45 The site benefits from good access to various local amenities. Indeed, there are many local amenities within close walk and cycle distance of the site meaning that residents are less likely to need a car. This is in accordance with **paragraph 114** of the NPPF, which seeks to ensure that on potential allocated sites and for new applications for development, appropriate opportunities to promote sustainable transport modes can be – or have been – taken up. It also seeks to ensure that, priority should be given to pedestrian and cycle road users for new developments, further in line with **paragraph 116 (a)** of the NPPF.
- 6.46 A Transport Statement been prepared to accompany the application which demonstrates that safe and suitable access to the site can be achieved from Orton Lane. The proposed development would be served via a new priority junction from Orton Lane, as shown on Drawing Number 197510-001G including the implementation of a footway along the sites frontage to improve pedestrian accessibility within the area.
- 6.47 To ensure that land to the north can come forwards without prejudice, the access proposals have been designed in line with requirements for a “major residential access road”, sufficient to serve a proposed development of up to 300 dwellings – significantly higher than the minimum 79 dwelling requirement of the proposed allocation and 32 dwellings proposed by this application.
- 6.48 Junction capacity modelling has been undertaken for the proposed access off Orton Lane. It confirms that the junction would operate well within acceptable limits of capacity during peak hours. There would also be minimal delay and queues associated with right turning movements and would not disrupt the free flow nature of Orton Lane.



- 6.49 The internal road layout comprises of a cul-de-sac arrangement which serves dwellings directly or via private drives leading to parking areas. The internal road layout has been designed in accordance with the Manual for Streets
- 6.50 On-site parking provision includes a total of 73 car parking spaces. This is above the recommended car parking standards within the emerging guidance (which is highlighted as a starting point in emerging **Policy HC13**) but generally in line with current guidance. This will assist with discouraging on-street parking from occurring within the site. In addition to the above, each house within the site will have a single fast charge socket installed, located on a parking space within the property's curtilage. This is in accordance with **paragraph 116 (d)** of the NPPF, which requires proposals to be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
- 6.51 Cycle parking is provided in line with the Emerging Local Plan Review **Policy HC13**, at a rate of one space per unit, within garages or a secure garden shed, which also accords with the current guidance.
- 6.52 The assessment work undertaken has shown that there would not be any demonstrable harm arising from the proposed scheme and it will not cause any severe impacts. Therefore, there are no traffic and transport related reasons for not allowing these proposals, which accord with **Policy EV11** and **EV12** of the adopted Core Strategy, emerging **Policy HC13** and **paragraphs 114, 115 and 116** of the NPPF.

## Noise

- 6.53 The submitted Noise Assessment demonstrates that the site is suitable for residential development and that noise need not be a determining factor in the granting of planning permission for the site.
- 6.54 A baseline noise survey was undertaken in June 2023 and the subsequent assessment work has been undertaken in accordance with current standards and guidance.
- 6.55 This assessment considers the impact of road traffic on the Proposed Development and its future residents and where necessary, consideration has been given to mitigation measures.
- 6.56 The key noise source affecting the site is road traffic on Orton Lane. The proposed site layout sets the proposed properties back from this road, with open space and landscaping in between.
- 6.57 This distance buffer reduces the levels of road traffic noise at the proposed properties and therefore reduces the sound reduction performance requirements of their building fabric. This is considered good acoustic design.
- 6.58 The orientation of the front row of properties closest to Orton Lane is such that they screen their gardens from road traffic noise. This use of buildings to provide acoustic screening to sensitive external areas is also considered good acoustic design.

- 6.59 The proposed site layout demonstrates good acoustic design, including a distance buffer. These design measures mean there will be no specific noise constraints, with the following outcomes predicted:
- Noise levels in external amenity areas are predicted to meet the more stringent 50dB LAeq guideline value in British Standard 8233: 2014 without the need for any further mitigation.
  - Standard thermal double-glazing should be sufficient to reduce noise levels inside the proposed properties to achieve the guideline values in BS8233: 2014 and WHO's guidelines.
  - Standard ventilation mechanisms such as trickle vents should be sufficient to achieve whole dwelling ventilation rates, providing they do not compromise the sound reduction performance of the external building fabric.
  - The use of open windows to mitigate overheating is unlikely to lead to any adverse effects on occupants, with internal noise levels predicted to achieve the noise level thresholds in Approved Document O (ADO) of the Building Regulations.
- 6.60 This is in accordance with adopted **Policy EQ9**, emerging **Policy HC11** and **paragraph 191(a)** of the NPPF which seeks to avoid adverse noise impacts giving rise to significant adverse impacts on health and the quality of life for existing and future residents of new development sites.

## **Sustainability**

- 6.61 The supporting Sustainability, Energy and Carbon Statement has been prepared to demonstrate how the proposed dwellings at Orton Lane respond positively to national and local sustainable policy requirements. This includes **paragraph 159 (b)** of the NPPF, which notes that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.
- 6.62 The proposed development at Orton Lane aligns with Bellway's corporate sustainability strategy 'Better with Bellway', in that it aims to deliver an exemplar scheme of low carbon homes which meet the anticipated 2025 Future Homes Standard.
- 6.63 Through a range of design measures, the development aims to protect and enhance the local environment. The following measures align with Local Plan Core **Policy 3** and **EQ5**, and emerging Policies **NB2**, **6**, **7**, and **EC12**, including:
- Provision of biodiversity enhancement measures to provide multi-functional benefits including the creation of wildflower meadow, a species-rich grassland mix, and hedgerow planting to contribute towards a net gain in biodiversity.
  - Provision of new landscaping including additional tree planting and areas of open space.
  - Provision of sustainable transport measures including a new pedestrian/cycle route and a new crossing facility to encourage safe pedestrian access.

- Provision of measures through construction and operation of the site to reduce pollution, minimise waste and encourage recycling.

6.64 In recognition of the climate emergency and local emerging policies relating to climate change (predominantly **Policy NB6**), the development will incorporate a range of measures to reduce carbon emissions, mitigate the effects of climate change, and to ensure the long-term resilience of the development to the effects of climate change. Measures include:

- Use of ASHPs and solar PV to reduce grid energy demand, helping mitigate the effects of climate change and reducing carbon emissions in line with the 2025 FHS, achieving a 75% carbon reduction beyond Part L 2013.
- Provision of EV charging provision in line with local policy requirements, with a charging point per house.
- Reduced emissions associated with private car travel though development in a sustainable location, with access to public transport and amenities, and provision of cycle storage.
- A design which has considered the embodied carbon associated with construction materials and selected sustainable products where possible to reduce environmental impacts of construction.
- A design which reduces the risk of overheating at current and future climate scenarios, in accordance with Part O of the Building Regulations.
- Development in Flood Zone 1, and incorporation of SuDS including a combination of swales and an attenuation basin to ensure that post development surface water-run off is managed up to 1-in-100-year storm events with a 40% allowance for climate change.

6.65 Such measures are also in accordance with **paragraph 159 (a)** of the NPPF, which states that new development should be planned for in ways to avoid increased vulnerability to the range of impacts arising from climate change and can help to reduce greenhouse gas emissions, through its location, orientation and design.

6.66 Overall, the sustainability strategy has been designed to accord with the adopted Core Strategy **Policies 3 and EQ5** and the higher standards incorporated into the emerging **Policy NB6**, and **paragraph 159** of the NPPF. Demonstrating the proposals go above and beyond the current requirements, in recognition of the need to respond to the climate emergency and help future proof the development.



## 7. Conclusions and Planning Balance

7.1 This Planning Statement has been prepared by Turley in support of a Full Planning Application submitted on behalf of Bellway Homes Limited, for the development of 32 homes on land west of Orton Lane, Wombourne.

7.2 The description of development ('the Proposed Development') is as follows:

*"Full planning application for the erection of 32 dwellings, access from Orton Lane, landscaping and other associated works."*

7.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

7.4 The site is sustainably located 1.5km to the immediate north of the village of Wombourne. Orton Lane situated to the east of the site and provides direct access to the village centre and its associated services and facilities, via a variety of sustainable transport modes, including bus, cycle, and pedestrian.

7.5 It has been demonstrated that the proposal is in accordance with the emerging Local Plan. Which in line with paragraph 48 of the NPPF, is at an advanced stage, the more advanced in its preparation, the greater the weight to be given to the relevant policies in these emerging plans.

7.6 Of particular relevance is the proposed emerging allocation at **Policy SA5** of the emerging Local Plan. Which proposes to allocate the site (and land to the north which makes up the wider land parcel) for a minimum of 79 homes across both sites. The proposal has been designed to accord with this emerging policy, the benefits of which are detailed below:

- Provision of 32 new high-quality dwellings in a sustainable location.
- Provision of 31% affordable housing across the site, to assist access to the housing ladder.
- Inclusion of both market and affordable bungalows and a mix of house sizes and types – adding choice and competition to the local housing market whilst meeting housing needs.
- Economic benefits during and beyond the construction period which will boost the local economy
- Enhancing connectivity in the wider area through provision of new pedestrian routes, knitting the site into the wider area and ensuring there is an opportunity for future connectivity with the land to the north which forms part of the wider proposed allocation. Supporting the accessibility of the site to local services and facilities.

- Net Zero ready homes, designed in accordance with the 2025 Future Homes Standard
- Providing enhancements to existing habitats on site, through supplemental planting, landscaping, and tree retention, where possible
- Delivery of a sustainable drainage solution for the site that will manage and mitigate the risk of flooding and climate change.

7.7 It is clear that any harm associated with the proposal is outweighed by its benefits, not least the delivery of new homes in a proven sustainable location within walking and cycling distances of existing services, facilities, and employment. It is therefore respectfully requested that South Staffordshire District Council, approve the application upon the adoption of the emerging Local Plan.

## **Appendix 1: Site Location Plan**





**Do not scale from this drawing.**  
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## PLANNING

— Site boundary (1.76ha)

Rev.	Date	Description
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Land to the west of Orton Lane, WOMBOURNE

### Location Plan

Job ref: 540	Drawing number: L01	Revision: -
Scale: 1:1,250 @ A3	Date: November 2023	



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**Appendix 2: Staffordshire County Council:  
Highways Pre-application advice**

**Staffordshire County Council: Highways Pre-Application Advice; ref;110011  
Orton Lane, Wombourne, WV5 9AP (residential development upto 50 units)**

Highways Officer	Simon Hawe
Level of application	Cat D
Date of site visit	Numerous times to the surrounding highway
Date of Written Pre-Application Advice	22/12/2021
Description of existing use	The site is located on the western side of Orton Lane on the northern outskirts of Wombourne. The site is currently undeveloped and appears to be farmland.
Development description and size	50 residential dwellings
Does it involve the relocation of an existing use	No
Level of assessment required	<p>The proposal will require a transport Statement and potential TP and may require contribution to a school travel plan – this would depend if the proposal subsequently requires extension to local schools.</p> <p>Ardent consulting Engineers have submitted a draft Transport Statement for comment.</p> <p>Comments were made on the Local Plan consultation that a new footway will be required over the site frontage to link to existing.</p> <p>Plan 197510-001 D, does not show this rather a footpath through the site that turns through two 90degrees ends. Whilst this may provide access for pedestrian, a footway over the site frontage would prove more beneficial and also ensure that the area of land required for visibility is unlikely to become overgrown.</p> <p>Consideration will need to be given to the speed over the site frontage (survey will be required). Additional work may be required e.g. gateway feature to ensure speeds are controlled. Please note this is a community speed watch area.</p> <p>Trip rates are acceptable in the draft TS. The use of census data is an industry standard way of calculating</p>



	<p>trip distribution but local observed flows could be used e.g. flows from Strathmore Close given census data is over 10 years old.</p> <p>The TS is generally acceptable but may need some amendments if the application is not forthcoming with a reasonable time from these comments and industry guidance changes.</p> <p>Consideration will be required of the facilities for pedestrians / cyclists between this site and local facilities such as schools and shops etc... access to other facilities such as the South Staffordshire Railway walk needs to be fully investigated.</p>
Layout of the proposal	<p>There have been no plans submitted showing a layout, however principles from MfS 1 and 2 should form the basis of any layout. 5.5metre wide carriageway with two metre footways. However, if there is a requirement for street trees then a footway width of 2 metres should be maintained.</p> <p>Preference is for connected streets with limited cul-de-sacs unless absolutely necessary. Turning heads will need to be supported by track runs of a refuse vehicles(exact size to be agreed)</p> <p>Street trees would require a commuted sum of approx£5,200 per tree. Any adoption process would need to include details of tree species, trees pits etc..</p> <p>Consideration needs to be given if future land is to be developed off this junction and access road to ensure sufficient size of junction.</p>
Parking provision (reserved matters stage)	<p>Car parking provision should be provided in line with South Staffordshire District Council's car parking standards. Consideration will also be required for electric charging points. .</p> <p>Standard car parking spaces should be a minimum of 2.4m x 4.8m, with garages 6.0m x3.0m for a single garage. Ideally parking for units adjacent junctions needs to be conveniently located to an access to the dwelling and parallel rather than tandem.</p>
Construction Management Plan	<p>A construction management plan would be required which includes the following:</p> <ul style="list-style-type: none"> <li>• Construction site access arrangements</li> <li>• Duration of planned works</li> <li>• Arrangements for the parking of site operatives and visitors</li> <li>• Loading and unloading of plant and materials</li> </ul>

- Storage of plant and materials used in constructing the development
- Details of the types and dimensions of construction vehicles accessing the site
- Construction hours
- Delivery routeing and hours
- Recorded daily inspections of the private road/ adopted highway leading to the site access
- Measures to remove mud or debris carried onto the private road/ adopted highway.

The construction management plan can be secured by pre-commencement condition.

## **Appendix 3: South Staffordshire Council Pre-application advice**





## Development Team Meeting – Thursday 20<sup>th</sup> April 2023 – 2-3pm

**Application no:** 23/00016/PREAPP

**Applicant:** Bellway Homes Limited

**Agent:** Turley

**Proposal:** Circa 45 new homes and associated development. This will include a new vehicular and pedestrian access point from Orton Lane, landscaped drainage attenuation and public open space, potentially incorporating a LEAP.

### Site Address:

SAD Site 416  
Land On The West Side Of Orton Lane  
Orton Lane  
Wombourne  
Staffordshire

### Attendees:

#### South Staffordshire Council:

Lead Planning Manager	Kelly Harris (KH)
Development Management Team Manager	Helen Benbow (HB)
Senior Planning Officer	Annabel Cooper (AC)
Senior Planning Officer	Patrick Walker (PW)
Senior Planning Officer (Housing Strategy)	Jen Fox (JF)
Senior Strategic Planning Officer	Ross Parker (RP)
Senior Ecologist	Matt Wall (MW)
Public Health Officer	Phil Edge (PE)
Ward Member – Wombourne North & Lower Penn	CLr Dan Kinsey (DK)
Senior Technical Support Officer	Amanda Willis (AW)

Apologies – Lucy Duffy - Development Management Assistant Team Manager

#### Agent/Applicant

Turley	Tom Armfield (TA)
Turley	Jessica Herritty (JH)
Bellway Homes	Matt Smith (MS)
Bellway Homes	Chris O’Hanlon (COH)
Bellway Homes	Gary Hooper (GH)
Bellway Homes	David Blackadder-Weinstein (DBW)



## **Submitted Documents:**

Covering Letter  
Pre Application Form  
Location Plan – L01  
Coloured Site Layout - 23034-SK01  
Constraints And Opportunities Plan - SK01  
Framework Plan - SK02

## **Proposal Summary / Presentation by Turley and Bellway Homes.**

The site comprises safeguarded land (part of site Ref: 416), as established by the adopted SAD, whilst the emerging Local Plan allocates the site as part of larger site extending to the north (Ref: 416 and 416a) for a minimum of 79 homes. The proposed development of circa 45 homes will not prejudice the delivery of the wider proposed allocation and connections will be facilitated to the land to the north.

The Site extends to 1.76ha, comprising grassed land and is located to the north of Wombourne, off Orton Lane. The site is bound by horse grazed pastures to the north and west with Orton Lane running parallel to the eastern boundary and dwellings on Strathmore Crescent to the south. The wider landscape comprises pasture fields, woodland and housing. Access to the site is taken from an agricultural gate on the north eastern edge of the site off Orton Lane.

The topography of the site has dictated the proposed surface water drainage strategy which includes attenuation being provided in the north western and south eastern corners of the site.

It is not anticipated that the heritage assets will be affected by the proposed development, however this will be the subject of technical assessments as part of the detailed planning application in due course.

Wombourne village centre is located approximately 1.5km to the south of the site offering a number of amenities including schools, shops, a leisure centre and healthcare services.

The site has excellent off-road pedestrian and cycle links to industrial and commercial employment opportunities in south Wombourne, as well as the village centre. The site is in close proximity to the South Staffordshire Railway Walk which provides long distance dedicated pedestrian and cycle connectivity as well as the nearby bus stop at Bull Meadow Lane.

It is proposed to submit a detailed planning application for circa 45 new homes and associated development. This will include a new vehicular and pedestrian access point from Orton Lane, landscaped drainage attenuation and public open space, to potentially incorporate a LEAP, in the south eastern part of the site.

Tree and landscape planting is proposed to frame the primary road, travelling east to west through the centre of the site, in accordance with Policy HC10: Design



Requirements of the emerging plan. Retention of existing trees, wherever possible, and additional planting is proposed throughout the site with enhancement along the northern and eastern boundary of the site in particular.

A pedestrian/cycle route is proposed along the northern edge of the site, with a potential opportunity for this to link with the site to the north, and travel to the primary road at the centre of the site.

The south eastern corner of the site offer a potential opportunity for habitat creation as well as drainage, subject to further assessment. In addition, a pumping station and attenuation tank, with appropriate offsetting, are proposed along the western edge of the site.

The proposals would provide a mix of market housing and policy compliant provision of affordable housing in a sustainable location.

The site would provide 30% affordable housing with a well balanced mix ranging between 2-4 bedroom properties all incorporating and energy efficient design.

The layout of the site and internal roads will be designed to ensure connectivity to land to the north, within the same proposed allocation, is provided

Application timescales.

The applicant would be keen to submit before the Local Plan review examination, however the position of the Local Plan at the moment is appreciated which regards to what is happening with national policy.

Prior to the submission of an application, appropriate community engagement will be carried out in late May/June of this year.

If the Councils 5 Year Housing Land Supply required additional applications to come in this application should be ready.

### **Kelly Harris - Lead Planning Manager**

There is slight confusion regarding times scales as it has been mentioned about submission of an application soon and maybe along with the Local Plan review as well. We will give our feedback on the basis of an application being submitted along side the Local Plan review, making the application policy compliant with the emerging Local Plan as it would be a different criteria if an application was submitted based on the 5 Year Housing Land Supply for a affordable housing and open space requirements for example.

### **Ross Parker - Senior Strategic Planning Officer**

For an application submitted based on the updated Local Plan, the Council are expecting a policy compliant scheme proposal to come forward in combination with the Publication Plan and Examination timescales.

The Council were expecting the allocation site to be submitted as one, as this is the southern part of the site, this should still allow for the delivery of the wider allocation.





I would draw your attention to the Appendix B of the site proforma of the Publication Plan, this details some site specific requirements for the delivery of the allocation.

Key policies to be mindful of:

SA5 – Housing Allocation

HG1 – Housing Mix

HG3 – Affordable housing

HG 10 – Design Requirements

HG-17 Open Space.

TA – We are in communication with St Phillips who are the promoters of the land to the north, both masterplans have been looked at together to ensure they work to deliver the whole allocation site comprehensively.

## **Jen Fox - Senior Planning Officer (Housing Strategy)**

### Affordable Housing

In accordance with the emerging Local Plan, should the site be progressed alongside this and determined after adoption, the requirement would be 30% affordable housing.

To confirm, any application submitted prior to adoption of the new Local Plan would be assessed against the existing Core Strategy, therefore the affordable housing requirement would be 40%.

Tenure split requirements are: 25% First Homes, 50% social rent and 25% shared ownership.

Changes will need to be made for any future submission in order to better integrate the affordable housing on the site. There is currently only one cluster of affordable housing and this should be split into two, to allow some affordable homes to be distributed more towards the East of the site.

Plots 19-25 are particularly poorly integrated because of the design of this area i.e. a private drive cul-de-sac, consisting entirely of affordable homes only, with a concentration of front of property parking and a lack of front of property landscaping to break this up. This area will need to be redesigned to introduce some market homes and improve design so the area cannot be easily read as affordable housing (as is currently the case).

### Housing mix

The emerging plan includes a requirement for 70% of all market properties to have 3 bedrooms or less. The proposed market mix doesn't currently comply with this. Based on need identified in the Housing Market Assessment, the 4 bedroom provision should be reduced to 25% and the 2 and 3 bedroom provisions equally increased to balance this out.

The affordable housing mix is acceptable as proposed.



The emerging plan also requires sites to demonstrate a clear contribution to meeting the needs of older people – there is currently no contribution through this proposal. As a starting point, the Council expects at least 10% of both the market and affordable housing to be provided as bungalows to ensure a sufficient contribution is made.

## Housing standards

As per the emerging plan, all properties will need to meet Part M4(2) of Building Regulations, as well as the Nationally Described Space Standard.

MS – to clarify on the percentage of requirement to meet the needs of older people, is this 5% market and 5% affordable?

JF – this would be 10% of each and not based on one tenure.

## **Patrick Walker - Senior Planning Officer (Urban Design and Landscape)**

Public open space – Needs to show compliance with emerging open space policy standard, which indicates that smaller areas of incidental green infrastructure without a clear recreational purpose and areas without public access will not count towards meeting the quantitative on-site open space standard. whether or not the SuDS pond counts therefore depends on its final form - Would like clarification if the SuDs pond is solely for drainages and fenced off or if it will be part of the POS? If fenced off it will not count towards meeting quantitative standards.

GH – Would be for drainage use and weather dependant.

Public/private space – poor delineation of public and private space around Plots 1/2, 6, 7 & 13; unclear what is within the curtilage of dwellings and what's within the POS; especially with visitor parking on green space. Unlikely to count as POS if not designed to be clearly legible as this use.

The proposed plan shows an overreliance on front of property parking on the primary route – given this is key route into and out of development, side of property parking, a consistent building line and more regular tree planting to create tree-lined street should be delivered.

Plot 38 – interrupts the building line of the primary route into/out of the site and interrupts effect of tree-lined street, sitting around 9m forward of otherwise a consistent building line; should be removed and changed to landscaped area with appropriate tree planting.

Future access road – The proposed road adjacent to the rest of the safeguarded land is currently designed as private drive, how would future access be delivered?

TA – Plans submitted with an application will be more detailed showing landscaping and clearly identifying public land etc.

With regards to parking, currently the proposed layout shows 36 dwellings per hectare



(this is 35 in the emerging plan), to hit these numbers, the amount of front of property parking is a result of trying to hit the density within the plan.

PW – to clarify, the 35 dwellings per hectare policy which is drafted in the 2022 plan, is for tier 1 settlements and urban extensions only. A tier 2 settlement where sites are smaller and more constrained, we would like efficient use of land however, we still want to see good layouts and design. Need to see how future access to the safeguarded land would be deliverable with any application.

MS – In terms of the access road to the safeguarded land, there has been communication between Bellway Homes and St Philips. Draft masterplans have been shared between us making sure the connection to each site works with both layouts and constraints within the sites such as trees. The current illustrative plan, does not really give a clear indication of or proposal for the access road. There is adequate space for a 5.5 metre carriage way and 2 metre footway to be provided.

PW – The Council would also need to see compliance with Policy NB6 – Sustainable construction, low carbon policy. We would be looking for documents to be submitted to include an Energy and Carbon Statement, setting out how the scheme will achieve net zero regulated emissions and energy efficiency improvements in a manner consistent with Policy NB6, including SAP calculations. As it's below 50 dwellings we'd expect this to set out how construction materials, process and design had sought to reduce embodied carbon as part of this and a Proposed Methodology for delivering a recognised quality regime to ensure 'as built' performance matches design performance (e.g. BSRIA Soft Landings) as well as a methodology for post-occupancy monitoring of a sample of the dwellings – see Policy NB6 for details.

### **Matt Wall - Senior Ecologist**

There may be some conflict with habitat creation and the use of areas as public open space, and I would expect this potential conflict to be sufficiently addressed in any proposals intending to use POS for habitat creation purposes. There is clear potential to ensure that the infiltration basin is well designed to maximise biodiversity benefits as well as surface water attenuation. 10% Biodiversity Net Gain will not be mandatory until November 2023, however the applicant should be aware of this forthcoming requirement, depending on the time of their intended submission.

MS – There will be a hybrid approach where we will provide BNG on site as well as off site contributions to reach 10% BNG. As much will be done on site as possible such as enhancing hedgerows, using POS and SUDs as suggested.

MW – it is important to get as much on site as possible for best practice.

MS – We are hoping to submit an application prior to the mandatory policy in November, however we are still looking to deliver 10% BNG.

MW – There is a slight concern of the vegetation along the Northern (north/west) part of the boundary where vegetation is within property boundaries. These areas should be





adjusted to ensure that the hedgerow does not form part of the curtilage of these plots, to ensure its longevity in these areas.

An ecological assessment to provide clarity on the impact of the proposal to habitats and protected and notable species would be required along with associated surveys which must be completed by professionally qualified (and appropriately licensed where necessary) ecologists in accordance with current good practice guidance documents (CIEEM, BCT etc.).

A biodiversity net gain report and metric will be required at the application stage which includes an off-site strategy to demonstrate that 10% net gain can be achieved. A condition can be applied for a biodiversity net gain plan (including 30 year management plan where appropriate) to iron out details at the condition stage.

NOx – South Staffordshire Council are currently progressing a review of the local plan. The Reg 19 Publication Plan currently has an objection from Natural England based on likely effects of nitrogen deposition from development traffic. Whilst SSC are progressing work to resolve this in-line with the local plan review timescales, a solution is not yet in place. Therefore, should the applicant submit an application prior to adoption of the new local plan, they must also include a shadow HRA as part of their application to clearly identify likely significant effects (both alone and in-combination), as well as mitigation measures as necessary.

Full written comments attached.

**Phil Edge - Public Health Officer**

From an environmental health point of view there are no concerns with this site. We would require a Contaminated Land Desktop Study and a BS8223 Noise Report.

**Helen Benbow - Development Management Team Manager**

As it stands, the proposed layout would not be supported from a DM perspective due to the issues raised with regards to plot siting, housing mix, link to the northern site, overreliance on frontage parking and the potential short fall of POS. Work is needed to be done on this proposed layout in order to address these concerns for the Council to support this proposal.

**Written Comments attached**

SSDC Senior Ecologist - Matt Wall

Staffordshire Police – Kully Tanda

Staffordshire County Council Flood Risk Team - Adam Bushnell



**Documents likely to be required should an application be submitted:**

- Arboriculture Constraints Report
- BS5837 Tree Survey and Arboricultural Impact Assessment
- Design and Access Statement
- Ecological Appraisal
- External Lighting Plan
- Flood Risk Assessment and Drainage Strategy
- Landscape and Visual Impact Assessment
- Landscape Scheme
- Planning Statement
- Site Waste Management Plan
- Statement of Consultation
- Transport Statement/Assessment
- Travel Plan
- Contaminated Land Report
- BS8223 Noise Report
- Construction Environmental Management Plan (CEMP)
- Draft 106 – if required

Please note that further information may be requested once a formal application is submitted.

# Flooding Information Request

**Ref: 23/00016/PREAPP**

**Site: Circa 45 new homes and associated development. SAD Site 416. Land on the West Side of Orton Lane, Orton Lane, Wombourne, Staffordshire.**

Grid Reference: 387145, 294355

Document created: 03/04/2023



This response is made by the County Council in its capacity as a Lead Local Flood Authority. The contents should be taken as general comments on flood risk and drainage only and are not suitable for identifying individual properties at risk of flooding.

The information is provided in good faith based on the latest flood risk data and information held by the County Council. The County Council cannot guarantee the information is complete or comment on its accuracy and is not liable for any use of this information by third parties.



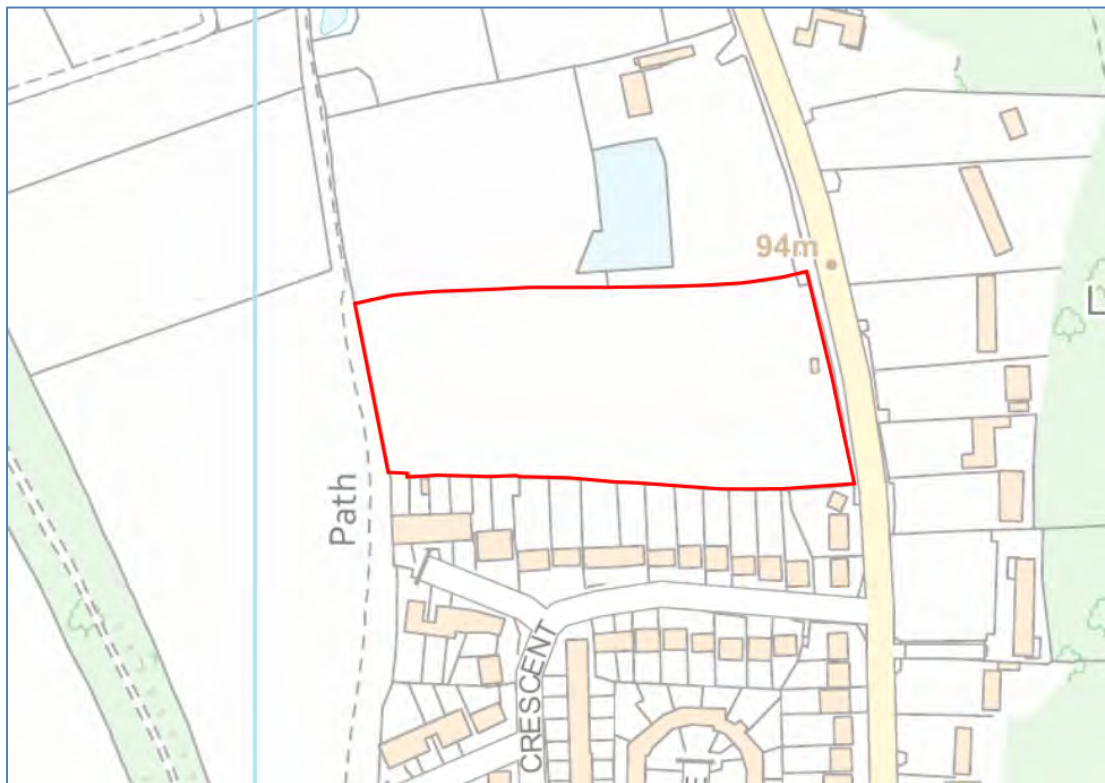


# Flooding Information Request

## Flood Zones

The Environment Agency's Flood Zones show the probability of fluvial flooding, ignoring defences. Flood Zone 2 shows areas with between 0.1% and 1% annual chance of flooding and Flood Zone 3 shows areas with greater than 1% annual chance of flooding.

**The site appears to fall entirely within Flood Zone 1 and as such is not shown to be affected by either the 1 in 100 year (1% AEP) or 1 in 1000 year (0.1% AEP) event. If you are not certain, you should contact the Environment Agency for more information.**



# Flooding Information Request

## Surface Water

The Environment Agency's Flood Map for Surface Water shows areas where surface water would be expected to flow or pond as a result of the following rainfall events:

- 1 in 30 year
- 1 in 100 year
- 1 in 1000 year

If a flow route is shown crossing your site (as opposed to isolated areas of ponding which may be rationalised during development) we expect it to be addressed in any FRA submitted.



**The site is not shown to be at risk from surface water flooding by the Environment Agency's Flood Map for Surface Water. This does not necessarily mean the site is not at flood risk, just that the models do not predict it. Further investigation may be required where you are unsure.**



# Flooding Information Request

## Flooding Hotspots

Staffordshire County Council is provided with records of historic flooding from a range of Risk Management Authorities (RMAs) and other sources. Records come from district councils, the Environment Agency, Severn Trent Water, United Utilities, emergency responders, residents, and other agencies.

The Council cannot verify every record of historic or provide property-specific information, but makes data available where possible, unless restricted by confidentiality agreements.

**We do not have any reported incidents of flooding within 20m of the site in question. This does not necessarily mean that the site has never been affected by flooding in the past. As part of producing a drainage strategy or flood risk assessment for the site, the applicant should always investigate all possible sources of information on past flooding.**

## Groundwater Flooding

We do not hold records for the proposed site and therefore cannot verify the risk of flooding from groundwater.

Further information on groundwater can be obtained from the British Geological Survey at <http://www.bgs.ac.uk> or from the Environment Agency.



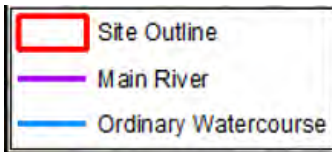
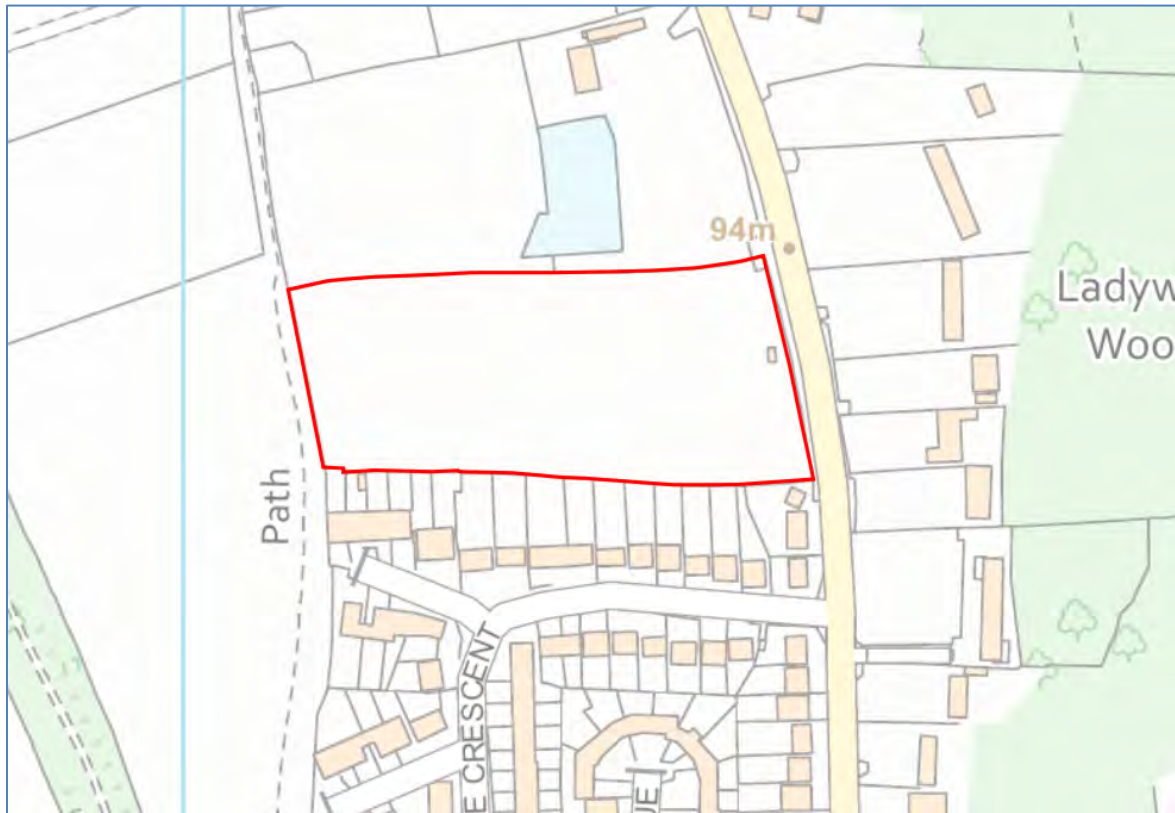


# Flooding Information Request

## Watercourses

Staffordshire County Council has a supervisory duty for ordinary watercourses. Ordinary watercourses include any river, stream, ditch, drain, sewer (other than a public sewer), or passage through which water flows and which is not classed as a main river and does not fall within an Internal Drainage Board (IDB).

The map below shows the location of watercourses that we are aware of:



# Flooding Information Request

## Consents and Regulation of Activities on Watercourses

If you are going to do any work on, or near to, an ordinary watercourse not maintained by an Internal Drainage Board then you may need our consent to do so. Information on consentable activities can be found on our website along with guidance and an application form:

<http://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Watercourse-works>

## Internal Drainage Boards

Internal Drainage Boards have permissive powers under the Land Drainage Act 1991 to undertake maintenance work on any watercourse within its district. Staffordshire has only one Internal Drainage Board and this is the Sow & Penk IDB. If you need consent for an ordinary watercourse within this IDB, you should contact the board directly.

**Our records show that the site in question does not fall within the Sow & Penk IDB. If the site will drain into the IDB, you should contact the board to discuss this.**



## Site-specific Comments

It is noted that the proposed development scheme is to utilise infiltration as a primary means of surface water discharge. Therefore, the LLFA would strongly recommend that the provision of innovative, forward thinking Green/Blue SuDs are utilised to derive maximally holistic benefits from infiltration (soak-away-to-ground).

In order to validate and corroborate the viability of infiltration (soak-away-to-ground), as a primary means of surface water discharge, full and complete testing- in compliance with BRE 365 industry best practice guidance should be completed. A full testing report with all associated data and time-series, in compliance with this BRE 365 best practice procedure should be submitted for LLFA review and approval.

Innovative, forward thinking Blue/Green SuDS, such as tree-pits, raingardens and permeable paving, as well as swales and infiltration basins, should be incorporated into the site drainage design in order to retain surface water as proximally near to the source as possible.

It would also be excellent if rainwater harvesting and re-use, could be incorporated into the site drainage design. This method of surface water discharge is at the top of the drainage hierarchy and so is to be considered first, before infiltration. Therefore the LLFA would strongly recommended that features such as water butts and other reuse and harvesting features are incorporated into the design. The site's drainage network can then be modelled without these feature included. Therefore giving a more conservative analysis for further embedded resilience.

## Lead Local Flood Authority Statutory Consultee Role

Staffordshire County Council, in its capacity as a Lead Local Flood Authority, has a duty to respond to consultations on surface water drainage for all major planning applications as of 15th April, 2015.

If this site will be classed as major development you will need to include a sustainable drainage design with the planning application. This should demonstrate:

- The site has an agreed discharge route for its surface water
- There is room to store attenuated water on the site up to and including the 1:100 year + climate change storm event
- That sustainable drainage techniques (including water treatment) will be used in the design



## Flooding Information Request

- That a responsible party will maintain the system over its lifetime
- That the site will be safe from flooding and will not increase the risk of flooding to any third-party

Guidance on the SuDS design process and local standards and arrangements for adoption and maintenance of SuDS, contents of a drainage strategy, and a proforma to accompany drainage strategies can be found in the Staffordshire SuDS Handbook:

<https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/SuDS-Handbook.pdf>

**End of report**





# Flooding Information Request

## Contact Details

### Environment Agency

#### *Flood Zones*

<https://flood-map-for-planning.service.gov.uk/>

#### *Surface Water*

<https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

#### *Groundwater Information*

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

#### *Sow & Penk IDB*

<https://www.shiregroup-idbs.gov.uk/idbs/sow-penk/>

#### **Staffordshire County Council**

<https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Flood-Risk-Management.aspx>

[flood.team@staffordshire.gov.uk](mailto:flood.team@staffordshire.gov.uk)

0300 111 8000



# Planning Application Response - Ecology

Assessment of submitted application documents and plans in relation to potential impacts and effects on designated wildlife sites, and protected and priority species and habitats.

**To:** Lucy Duffy – Development Management Assistant Team Manager

**From:** Matthew Wall – Senior Planning Ecologist

**Location:** SAD Site 416 Land on The West Side Of Orton Lane Orton Lane  
Wombourne Staffordshire

**Details:** Circa 45 new homes and associated development. This will include a new vehicular and pedestrian access point from Orton Lane, landscaped drainage attenuation and public open space, potentially incorporating a LEAP.

**Planning Ref:** 23/00016/PREAPP

**Date:** 28/04/2023

## Introduction

Thank you for consulting me on this application. I have reviewed all of the submitted documentation for the above application for pre-application advice.

I have not visited the site but have viewed aerial photographs, biological records from Staffordshire Ecological Record, and information on DEFRA's MAGIC map to inform my response.

## Assessment of Submitted Documents and Plans

I welcome the retention of the peripheral vegetation as it appears to be mature and would not be readily replaced like-for-like in a short period of time. The northern hedgerow also appears to include several mature trees, and I welcome the indicative avoidance of their RPAs in the plans, of course I will defer to the Arboricultural Officer for the appropriateness of any future submitted arboricultural measures. Units 14 and 25 appear to have parts of the hedgerow in their rear gardens and I would want to see these areas adjusted to ensure that the hedgerow does not form part of the curtilage of these units, to ensure longevity of the hedgerow in these areas.

The submitted documents provide very little opportunity for habitat enhancement or creation to achieve a measurable biodiversity net gain which the scheme will be required to

demonstrate. Best practice measures for BNG must be followed, by first maximising the habitat creation and enhancement opportunities on site. Biodiversity credits must only be used where all on-site opportunity to deliver BNG have been explored and maximised, using credits as a default option will not be acceptable.

There is likely to be conflict with habitat creation and the use of areas as public open space, and I would expect this potential conflict to be sufficiently addressed in any proposals intending to use POS for habitat creation purposes. There is clear potential to ensure that the infiltration basin is well designed to maximise biodiversity benefits as well as surface water attenuation. 10% BNG will not be mandatory until November 2023, however the applicant should be aware of this forthcoming requirement, depending on the time of their intended submission.

The site may be suitable for a range of protected species, and I would expect any submitted ecological reports to include an assessment of the potential for the site to support protected species as well as the results of any further surveys considered to be necessary. It is not clear from aerial photographs what type of habitats are present at the site; these may be important in their own right and should also be fully considered within any ecological reports. Mature trees on site may be suitable for protected species such as roosting bats and barn owl, and this should be fully assessed within ecological reports.

The site is not subject to any non-statutory wildlife site designation at the time of writing and I do not anticipate that these will form a significant constraint.

#### Nitrogen Impacts to Designated Wildlife Sites

Footprint Ecology's October 2022 Habitats Regulations Assessment (HRA) of the South Staffordshire Local Plan Review 2018-2038 (Publication Plan, Regulation 19) concluded that without additional evidence, and in line with the precautionary principle, the reasonable possibility of the proposed allocations resulting in traffic growth sufficient to have a significant impact upon several European sites via increased deposition of nitrogen (NO<sub>x</sub> and NH<sub>3</sub>) could not be screened out. This resulted in an objection from Natural England to the Publication Plan which has not yet been resolved.

Work is ongoing to establish an evidence base and to develop appropriate mitigation strategies to resolve this objection concurrent with the local plan review process.

Should this application be submitted prior to a strategic solution being in place as part of the new Local Plan, the applicant will need to submit a shadow HRA to demonstrate no likely significant effect on site integrity, and include appropriate mitigation measures where a significant effect to site integrity (either alone or in-combination) is likely to occur.

Relevant guidance<sup>123</sup> and best practice must be followed in relation to the assessment, using the best available scientific evidence.

## Recommendations

- Completion of an ecological assessment (in the form of an Ecological Impact Assessment report (EclA)) to provide clarity on the impact of the proposal to habitats and protected and notable species. The ecological report and associated surveys must be completed by professionally qualified (and appropriately licensed where necessary) ecologists in accordance with current good practice guidance documents (CIEEM, BCT etc.).
- Submission of a completed DEFRA 4.0 (or most recent version at the time of submission) metric including a report which provides sufficient detail on baseline and proposed condition assessments, and information on how the proposal will achieve biodiversity net gain. The Nature Recovery Network mapping document provides a useful basis for assessing the strategic significance of habitats in the district.
- Trees and hedgerows should be retained where possible, and the Council's Tree Officer asked for advice if not already consulted. If any trees are to be removed for this development, they should be fully assessed for potential to support protected species and replaced appropriately in landscape proposals.
- Production of a shadow HRA if the application is submitted prior to adoption of the new South Staffordshire local plan.

## Note on Biodiversity Net Gain

Please note that under the Environment Act 2021, all planning permissions granted in England, with a few exemptions, will have to deliver 10% biodiversity net gain (BNG) from November 2023. BNG will be measured using DEFRA's biodiversity metric and management of habitats will need to be secured for at least 30 years. Prolonged delays to the submission of technical details for this site may therefore require further information to be provided on net gain to deliver the mandatory 10% BNG. Prior to November 2023, the development will only be required to deliver a net gain in accordance with Paragraph 174(d) of the NPPF.

Please note that 10% BNG will be required on determination of applications. Should this application therefore be submitted in September and determined in November, the 10% requirement will apply.

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<sup>1</sup> <sup>1</sup>A guide to the assessment of air quality impacts on designated nature conservation sites [air-quality-impacts-on-nature-sites-2020.pdf \(iaqm.co.uk\)](#)

<sup>2</sup> [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001](#)

<sup>3</sup> [Advisory Note: Ecological Assessment of Air Quality Impacts | CIEEM](#)





STAFFORDSHIRE  
**POLICE**

Lucy Duffy  
Development Control  
South Staffordshire District Council  
Codsall  
South Staffs  
WV8 1PX

Early Intervention & Prevention Unit  
Ground Floor, Block 9  
Staffordshire Police HQ  
Weston Road  
Stafford  
ST18 0YY

Email: [DOCO@staffordshire.police.uk](mailto:DOCO@staffordshire.police.uk)

Date: 3/4/23

Dear Lucy Duffy

Ref No: 23/00016/PREAPP

Location: SAD Site 416 Land On The West Side Of Orton Lane Orton Lane Wombourne  
Staffordshire

Proposal: Circa 45 new homes and associated development. This will include a new  
vehicular and pedestrian access point from Orton Lane, landscaped drainage  
attenuation and public open space, potentially incorporating a LEAP.

The proposal has been reviewed with particular reference to Police CPI's Secured by Design guidance and in accordance with the recognised principles of Crime Prevention Through Environmental Design.

The following comments should be considered in the light of the following:

- Under the heading Promoting Safe and Healthy Communities, Para 91(b) of the NPPF states "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion."
- Under the heading Achieving Well-Designed Places, Para 127(f) of the NPPF states "Planning policies and decisions should ensure that developments create places that are safe ... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."
- Under the heading Planning Should Address Crime Prevention, Design Para 10 of the NPPG states "Designing out crime and designing in community safety should be central to the planning and delivery of new development";
- South Staffordshire District Council LDF Core Policy:
  - Core Policy 13, Community Safety states:  
The design of buildings and spaces can make a significant contribution towards reducing the scope for crime, and create more pleasant and reassuring environments in which to live, work and play. The opportunities for crime to occur can be minimised by designing and planning out crime in new development. The Council supports the national guidance **'Secured by Design'** and will continue to work with Staffordshire Police architectural liaison officer in relation to the design and layout of development proposals.
- Policy CS1: Designing Out Crime:
  - In accordance with Core Policy 13, the design of development must include, means of reducing the opportunities for crime and anti-social behaviour, and must also seek to reduce the potential for fear of crime. This will include support for:
  - Social facilities to be provided in locations which can be adequately controlled and supervised;
  - Development to be designed to increase natural surveillance of public and private spaces, with continuous public surveillance as an alternative;
  - Liaison with the Police to design out crime and fear of crime in specific schemes which also meet other design objectives in Policy EQ11.

Development proposals should be consistent with other local planning policies. Core Policy 13 sets out the strategic policy for community safety that supports the aims and objectives of the Sustainable Community Strategy and the Community Safety Partnership Plan. The above Policy provides further detail on the design of development and 'Secured by Design', and in turn supports Policy EQ11 covering wider design considerations.

- The statutory obligation placed on local authorities to do all they reasonably can to prevent crime and disorder in accordance with Section 17 of the Crime and Disorder Act 1998;

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Whilst I have no objections to this application, it is important that a high level of physical security is incorporated in these proposals and that the following be considered.

### Design Concerns

#### 1. Permeability of the site

SBD Homes 2023 through-roads and cul-de-sacs Section 8.3 & 8.4

A review of available research in this area concluded that:

***"Neighbourhood permeability... is one of the community level design features most reliably linked to crime rates, and the connections operate consistently in the same direction across studies: more permeability, more crime. Several studies across several decades link neighbourhood property crime rates with permeability versus inaccessibility of neighbourhood layout. Neighbourhoods with smaller streets or more one-way streets, or fewer entrance streets or with more turnings have lower property crime rates..."***

*Source: Taylor R B 2002 "Crime Prevention Through Environmental Design (CPTED): Yes, No, Maybe, Unknowable, and all of the above" in Bechtel RB (ed) "Handbook of Environmental Psychology", John Wiley, New York, Pages 413 – 426. Cited by Professor Ted Kitchen Sheffield Hallam University 2007.*

*There are advantages in some road layout patterns over others especially where the pattern frustrates the searching behaviour of the criminal and their need to escape. Whilst it is accepted that through routes will be included within development layouts, the designer must ensure that the security of the development is not compromised by excessive permeability, for instance by allowing the criminal legitimate access to the rear or side boundaries of dwellings, or by providing too many or unnecessary segregated footpaths.*

*Developments that promote intuitive wayfinding and enhance the passive surveillance of the street by residents within their homes and high levels of street activity are desirable as they have both been proven to deter criminal behaviour.*

There are proposed links from this application which will lead to future developments in adjacent SAD sites. Unless the through-road is the primary road to the proposed further development, I do not recommend access roads to connecting neighbouring sites. These through-roads will become 'rat runs or escape routes' after acts of criminal behaviour and/or anti-social behaviour (ASB).

**It should be noted the public footpath 'leaky cul-de-sacs' are considered an undesired feature, and may lead to anti-social behaviour.**

The proposed public footpath should ensure it is natural surveillance and is in view of active rooms. Public footpaths should be well lit, especially in light of the government initiative to provide safe environments and prevent Violence against Women and Girls.

#### 2. Public Right of Way

Public Right of Way, Wombourne 23 runs outside the boundary of the site in the application. But this should be taken into consideration, during the development of the site.

No access should be created linking the new estate to the Staffordshire Railway Walk. Provision of an access point, may lead to ASB, as well as an providing an escape route after committing a criminal act.

#### 3. LEAP

Play areas are vulnerable to crime and being damaged, the result of this abuse is that the investment in a play area, its use, and contribution to the quality of life in the community can be seriously eroded.

An evaluation of the needs of the community should be addressed prior to implementation of this area and it is important when carrying out a post implementation evaluation of crime or ASB of this facility to separate incidents around the play area i.e. roads, parking areas, drinking in the street, dwelling frontages, etc. from those which actually occur within it, part of any ASB evaluation should include how many perceived ASB incidents are attributed to estate families and incidents attributed to non-resident families.

**I use the word “perceived” because when a play area is being used to play or otherwise engage a young person this usually generates a certain amount of noise, this by itself is not anti-social – its noise.**

My following recommendations highlight design and management features which need to be included in the planning of play areas, and their design and construction which will help to block the opportunity for crime and anti-social behaviour.

Community Planning;

- Be able to show clear intended use related to age group, this should be considered relative to other local play facilities or youth clubs for other age groups within the community – it is important in avoiding potential abuse that all age groups are recognised with appropriate facilities included in a positive way.
- Provide adequate space for the proposed activity within the play area complete with a buffer zone between the activity and adjacent dwellings or other occupied buildings.
- Relate intended playing area use to immediate infrastructure e.g. allow adequate road, cycle/footpath access and secure parking or cycle storage nearby.
- Locate the play area for young and very young children within the protection of the built community to ensure good natural surveillance and supervision.
- Ensure that ownership and management of the proposed facility is in place with adequate resource available for maintenance and any improvements should they be required.

Play Area Design;

- Boundaries should be clearly defined with features to prevent unauthorised motor vehicle/cycle access.
- Boundary fences and landscaping should allow natural surveillance across the play area from public areas, roads and footpaths.
- Lighting should be appropriate to facilitate natural surveillance at night and reduce fear of crime.
- Public rights of way through the play area should be discouraged.
- There should be controlled informal access to the play area to prevent dog fouling and littering from public areas.
- No structure or landscape features should compromise boundary security providing points to climb over the perimeter fence.
- **Areas used for “adventure play” should have clear natural surveillance without potential “hiding” places or places for litter to collect.**
- Additional security measures necessary to address particular crime problems in the surrounding area.
- Consider the design of a youth shelter to avoid gathering in adjacent streets rear parking courts etc.

Management

- **Regular maintenance routines should be “designed in” to prevent the facility becoming unusable.**
- The facility should be regularly monitored and the community involved in any potential expansion.
- Crime and anti-social behaviour patterns recorded and any appropriate action considered.
- Any improvements or changes to prevent crime and encourage use should involve community consultation.

4. Visitor parking

There are a number of rows of terraced properties, which have driveways abutting each other. This provides suitable parking allocations for the residents, however there are no suitable parking provisions for visitors i.e. properties on the cul-de-sacs have limited street parking, without blocking access to driveways. There may result in neighbour tensions and ASB.

I recommend a number of visitor parking bays are created throughout the development, in addition to those provided at the entrance to the development.

5. Existing properties – backing onto leap

There are a number of existing properties which will back onto the proposed LEAP area. As previously mentioned LEAPs will generate a certain level of noise when occupied by children. The existing residents may consider this to be ASB. I recommend the boundaries backing onto these properties have acoustic fencing installed, in addition to enhanced landscape planting proposed to absorb any noise. Not only will these measures act as a sound barrier, but this will improve the security for the residents.

### Secured By Design

It is recommended that the development should be built to Secured By Design Standards (SBD), which considers security within the design of any development. Guidance can be found in the Secured By Design Homes 2023 guide [SBD Design Guides \(securedbydesign.com\)](https://www.securedbydesign.com/).

Research shows that adopting SBD can reduce burglary by 50%, car crime and criminal damage by 25%, therefore the carbon costs of replacing door-sets and windows on SBD developments as a result of criminal activity is more than 50% less than on non SBD developments, *the cost of installing SBD approved products equals 0.2% of the total build cost.*

**One of the most revealing elements of research into SBD is how much 'safer' residents feel if they occupy a dwelling on an accredited development, even if they are not aware of the award status.** There are few other initiatives which can deliver a measurable reduction in fear like this.

SBD supports one of the Government's key planning objectives - the creation of safe, secure, quality places where people wish to live and work. SBD applies quality standards to a range of security measures and should be seen as a positive marketing opportunity.

SBD can contribute towards BREEAM assessments.

-----  
Kully Tanda  
Designing Out Crime Officer  
Staffordshire Police

*The recommendations contained within this report are the professional statements of the author. As such, they represent what we believe to be the best advice in terms of 'doing all that is reasonable to prevent crime and disorder' under the terms of Section 17 of the Crime and Disorder Act 1998. All comments and recommendations are 'Site Specific'. Crime prevention advice is given free without the intention of creating a contract. Neither do the Home Office or the police service take any other legal responsibility for the advice given.*



## Appendix 4: List of Planning Application Documents

Application Documents/Plans	Author
Arboricultural Impact Assessment (AIA)	Barton Hyett Associates
Archaeological and Heritage Assessment	EDP
Biodiversity Net Gain Assessment	CSA Environmental
Design and Access Statement (DAS)	Edge Design
Ecological Impact Assessment	CSA Environmental
Flood Risk Assessment and Drainage Strategy	Ardent
Geo-Physical Assessment	GRM
Information to Inform Habitat Regulations Assessment	CSA Environmental
Landscape Assessment	Turley
Noise Assessment	Resound Acoustics
Planning Statement	Turley
Statement of Community Engagement (SCE)	Turley
Sustainability Statement inc Infographic	Turley
Transport Statement	Ardent

## Appendix 5: List of Planning Application Plans

Application Plans	Reference
Site Location Plan	L01
Existing Site Plan	L02
Proposed Site Plan (Layout Plan)	1000 G
Proposed Elevations and Floor Plans	BM-01, BM-01, B0L-01, B0L-02, BU43-01, CS-01, CT-01, DF-01, DF-02, GAR-01, GAR-02, MA-01, RE-01, SUP-01, WA-01, WA-02, WA-03, WE-01, WE-02, W0-01
Boundary Treatment Layout	1002
Detailed Landscaping Plan	GL2220 01D
Drainage Strategy	197510-003 Rev C
Proposed Site Access (within Transport Statement)	197510-D001G
Refuse Vehicle and Fire Tender Swept Path Analysis (Within Transport Statement)	197510-D004A

**Turley Office**  
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**Turley**

**Appendix 9: Representations to Policy NB6A:  
Net Zero New Built Residential  
Development (Operational Energy)  
and Policy NB6C: Embodied Carbon  
and Waste**



# **South Staffordshire Local Plan Regulation 19 Local Plan Representations**

Representations on behalf of Bellway in respect of the Council's sustainability policies.

May 2024

## **Introduction**

These representations have been prepared in response to South Staffordshire Council's Regulation 19 Local Plan consultation on behalf of Bellway with regards to the Council's Sustainability policies.

Bellway recognises the implications of climate change and has a proactive approach to design to ensure development mitigates and adapts to climate change. We support measures to reduce carbon emissions through both construction and operation and recognise the Council's ambition in setting policies which go beyond national requirements.

However, any specific requirements which go beyond the current Local Plan and national guidance need to be supported by an appropriate evidence base, including a viability assessment. In this context we have a number of concerns with regards to a number of requirements set out in the Council's sustainability policies. Our response to these policies is set out below.

### **Draft Policy NB6A: Net Zero New Built Residential Development (Operational Energy)**

While we support the Council's ambition for delivery of net zero homes, we have some concerns over requirements of *Policy NB6A*.

#### **Overarching Carbon Reduction**

It is considered that any feasible and viable policy should be restricted to regulated energy only. As a housebuilder Bellway only has the ability to influence the regulated energy demand of homes through design and specification of materials and systems, and renewable energy technologies. The unregulated energy consumption, (often referred to as 'plug in load') of homes is ultimately the function of the residents' use of the building, which cannot be influenced by the developer and therefore the requirement on the developer to reduce or offset emissions from residents' unregulated energy use is not appropriate.

Post 2025 one of the greatest demands for unregulated energy in new homes will be to charge an electric vehicle. We consider it unreasonable to assume that a housebuilder could influence such demand or should effectively meet the cost of mitigating carbon from a resident charging their electric vehicle.

The FHS and FBS consultation<sup>1</sup> states, *'We consider that metrics which include unregulated loads are not a suitable because designers and housebuilders have little or no control over these end uses of energy.'*

Furthermore, points A2-A4 of the Policy refer to regulated energy only, therefore, in this context and to maintain consistency, any requirements which go beyond national standards should only relate to regulated energy.

## **Energy Efficiency**

We agree with the Council's Policy requirement to achieve regulated carbon emissions reduction through energy efficiency features. However, any emissions reduction targets should be in line with the latest national standards, for example the forthcoming 2025 Future Homes Standards.

It is also important to note that as part of the FHS and FBS consultation from December 2023 the Government has reiterated its strategy to not set any specific energy performance targets at this time, instead focussing on improvements in carbon reduction.

In addition on December 13th the Government released a Written Ministerial Statement (WMS)<sup>2</sup> 'Local Energy Efficiency Standards Update', which sets out clarity on the development and application of local energy efficiency standards in the context of advancing national policy.

The WMS states, *'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:*

- *That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.*

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<sup>1</sup> <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

<sup>2</sup> <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

- *The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).'*

In this context we would recommend that the Policy is updated to only reference alignment with the 2025 Future Homes Standard requirements.

### **Renewable Energy Supply**

We support the Policy's requirement on provision of renewable energy generation to help reduce carbon emissions. We would note that the FHS and FBS consultation includes requirements for the provision of Solar PV on new development from 2025. We are, however, cautious over a requirement to achieve a 100% reduction in TER via onsite generation.

The Options Appraisal to inform Policy NB6 prepared by Bioregional states that *'the prescriptive nature of such policies may not be applicable for all sites and can occasionally lead to the installation of inefficient onsite renewables. Some sites may not be able to meet a very high requirement for renewables, such as if they are overshadowed (meaning solar PV panels would not work well), or if it is a tall building where there is a larger amount of internal floor space demanding energy but a relatively smaller roof space for PV.'*

In addition, maximising the provision of renewable energy could lead to unintended consequences or contradictions in design. For example, where development aims to respond to the character of the local area maximising onsite generation would likely mean covering available roof space with Solar PV, precluding the provision of roof lights, dormer windows etc which would otherwise be part of the design aesthetic of the development.

With regards to the renewable energy target of 120kWh/yr/m<sup>2</sup> of building footprint we do not believe this is an achievable objective. For context below a worked example is included:

Example – 90m<sup>2</sup> three bedroom house  
 Footprint - 45m<sup>2</sup>  
 Energy demand required (based on 120kWh/m<sup>2</sup>/yr) – 5,400kWh/yr  
 Energy generated / kWp of Solar – 850 kWh/kWp  
 System size required– 6.4kWp  
 Area of PV /kWp – 5m<sup>2</sup>/kWp  
 Area of PV required – 32m<sup>2</sup>

As set out above, to meet this target, a typical three bedroom house would require around 32m<sup>2</sup> of PV. A typical three bedroom house has at most c.32m<sup>2</sup> of roof space,



reducing to c.24m<sup>2</sup> of available space when taking into account areas around the edge of the system. This is significantly less than the roof area available.

Other development types may include dormer windows, roof lights etc to provide a mix of design which is keeping with the design and character of the area, therefore, setting this best practice requirement will stifle design and the character of development.

In this context, we would recommend that the Policy wording here is updated to achieve net zero regulated carbon emissions where this is feasible and viable, in line with latest national policy requirements and the reference to the energy generation target is removed as it is technically not achievable.

### **Offsetting**

We broadly support the addition of a mechanism to offset residual carbon emissions provided that the scope and cost of such a policy has been tested. We agree that offsetting payments should be linked to the Government's Green Book carbon pricing and should take account of grid decarbonisation.

However, we do have concerns that the policy refers to both regulated and unregulated emissions for the reasons outlined above, therefore, we suggest that the Policy is amended to offsetting remaining regulated emissions only.

In addition, we do have concerns that a viability assessment for offsetting costs has not been undertaken due to the following reason set out in the Options Appraisal prepared by Bioregional: *'In the context of the South Staffordshire recommended offset approach for new residential development, offsetting does not need to be considered in viability assessments because the price set is equal to the cost of on-site measures and therefore does not represent an additional cost to the developer.'*

As set out above, the on-site measures only are unlikely to achieve net zero development, therefore, we consider Bioregional's conclusion inaccurate and a viability assessment for the cost of offsetting carbon has to be undertaken and included as part of the viability assessment for the Policy to be sound and deliverable.

Furthermore, the Policy needs to include reference to delivering the required carbon offset within a reasonable timeframe. The Council should set out its expectation on a timeframe for spending the funds collection. The National Planning Practice Guidance states, *'[S106] agreements should normally include clauses stating when and how the funds will be used by and allow for their return, after an agreed period of time, where they are not'* and, *'The Centre for Sustainable Energy notes that developers can ask for a refund of carbon offset payments that are unspent within 5 years.'* We would recommend the supporting text includes reference to the provision of a timeframe as above.

## **Post Occupancy Evaluation**

We support the Council's requirement on monitoring and reporting energy use and renewable energy generation post-occupation, however, we are concerned over lack of clarity with regard to a sample size, which could potentially put a disproportionate burden on the housebuilder. As pointed out by the Options appraisal: *'the economy of scale would reduce the cost burden through sample testing only'*. We recommend that post-modelling is carried out on 10% of homes only as per the previous draft policy wording and recognised by the Council as *'a minimum sample size to gain knowledge on the performance of the development, whilst not being overly onerous on developers.'*

## **Viability**

The viability of Policy NB6A is set out in the 'South Staffordshire Council Local Plan Review: Sustainable Construction Policy NB6, Task A, Rev 3.0', which notes that primary evidenced cost uplift data for South Staffordshire wasn't produced provides. Instead, cost uplifts are set based on the national and local government cost sources.

The evidence base includes FHS Impact Assessment 2019 and Currie & Brown (C&B) 2021 report for Cornwall Council's Development Plan Document Evidence Base. In addition, cost evidence bases for recent energy-based local plan policies in Greater Cambridge, Central Lincolnshire, Essex and a collection of London boroughs were utilised to assess cost uplifts for a range of potential South Staffordshire policies.

While evidence has been gathered from a number of sources the cost analysis from the 2023 FHS consultation has not been considered. The cost uplift included in the report noted above and the February Addendum which considers the Government's WMS note uplift costs of 2.6% and 2.9% respectively. However, the Government's FHS consultation notes a cost uplift of 1% for Option 2 and 4% for Option 1. If Option 1 is selected this cost is significantly higher than the 2.9% assumed, and does not include the additional offsetting costs.

Therefore, it is not clear how relevant this assessment is for South Staffordshire Council, as no specific costing exercise for South Staffordshire Council has been undertaken.

For the reasons as set out above, we consider there to be a number of potentially significant omissions from the viability assessment that justifies Policy NB6A and therefore recommend that the Council reviews the assessment to ensure it is sound and meets the requirements of the NPPF and Planning Practice Guidance (PPG).

## **Recommended Policy Updates**

Below we have set out some recommended amendments to Policy NB6A.

### ***A1. Overarching carbon reduction***

New residential development of 1 or more homes shall achieve net zero regulated ~~and unregulated~~ carbon emissions, **where feasible and viable**, through the application of requirements A2 – A4 laid out below.

Regulated carbon emissions should be calculated with SAP10.2 or any more recent replacement methodology.

The regulated carbon reduction should be achieved through on-site measures, unless this is demonstrated to the council's satisfaction that it is unviable or unfeasible with reference to site-specific factors.

## **A2. Energy efficiency**

A **63%** reduction **in regulated carbon emissions in line with the latest national regulations on the Part L 2021 TER (regulated carbon emissions)**, is to be achieved through energy efficiency features.

Alternatively, where Passivhaus certification is proposed (or a space heat demand of  $\leq 20\text{kWh/m}^2/\text{year}$  and a total energy use intensity of  $\leq 45\text{kWh/m}^2/\text{year}$ ) and the proposal is fossil fuel free, the applicant will not need to submit SAP calculations. In that case the applicant's Energy Statement should instead cite their PHPP calculations, and a condition will be set requiring evidence of fulfilment on completion.

## **A3. Renewable energy supply**

Subsequent to point A2, a further reduction **of to net zero** regulated carbon emissions **in line with the latest national regulations** is to be achieved through on-site renewable energy generation and/or connection to a certified renewable or low-carbon (fossil-free) local energy network.

Where it is proven unfeasible or unviable to include enough on-site renewable energy to achieve a 100% reduction in TER in this way, and this can be demonstrated to the council's satisfaction with reference to site-specific factors, the applicant will first demonstrate inclusion of as much renewable energy as feasible and viable, then address the remaining regulated carbon emissions by offsetting as per point A4.

Large-scale development (50 residential units or more) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual dwellings), such as solar PV canopies on car parks, have been explored.

**~~Proposals are encouraged to demonstrate that the amount of on-site renewable energy generation equates to  $\geq 120\text{kWh/m}^2$  projected building footprint/year.~~**

#### **A4. Offsetting**

*Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve the requirements of A3 above, any residual carbon emissions from regulated ~~and unregulated~~ energy are to be offset via a Section 106 financial contribution reflecting 30 years of the building's operation **and linked to decarbonisation.***

**Funds raised through this policy will be ring-fenced and transparently administered by the Council to deliver a range of projects that achieve measurable carbon savings as locally as possible, at the same average cost per tonne. Funds will be spent within 5 years of collection or returned to the developer.**

#### **A5. Reduced performance gap**

*Applicants are encouraged to submit, alongside their SAP figures, a set of total energy performance predictive calculations using Passivhaus Planning Package (PHPP), CIBSE TM54, or other method demonstrably proven to produce accurate predictions of total in-use energy.*

*An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.*

#### **A6. Smart energy systems**

*Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement.*

*Where the on-site renewable energy generation peak is not expected to coincide with sufficient energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for (and where appropriate implemented) energy storage and/or smart distribution systems.*

#### **A7. Post-occupancy evaluation**

*Large-scale development (over 50 homes) should monitor and report total energy use and renewable energy generation values **for 10% of the proposed dwellings** on an annual basis for 5 years from first occupation. An outline plan for the implementation of this should be submitted with the application. Monitored data are to be reported to the local planning authority.*



## **Draft Policy NB6C: Embodied carbon and waste**

We fully support the Council's objective to address embodied carbon and waste. With the introduction of the 2025 FHS and FBS, the operational emissions of development will continue to decrease, increasing the proportion of emissions which relate to construction and the embodied carbon of materials.

At this stage the embodied carbon of new development is not considered as part of the Building Regulations, however, as part of the FHS and FBS consultation the Government has requested information on embodied carbon and it is likely that embodied carbon will be included in the future.

While we support the Council's requirement for new developments to be supported by a Whole Life Cycle Assessment, we are concerned about setting any fixed targets. Currently the Building Regulations do not set a specific requirement for embodied carbon.

A number of guidance documents including the LETI Design Guide and RIBA 2030 Climate Challenge strategy set out potential embodied carbon targets, however the potential deliverability and viability of tackling embodied carbon is largely unknown at this stage. Reducing embodied carbon requires changes to design and specification of materials, often for more expensive materials. The London Plan which typically sets out targets ahead of other Local Authority plans currently only requires developers to assess embodied carbon and does not yet set any specific targets.

In addition, as recognised by LETI Design Guide and RIBA 2030 Climate Challenge strategy, the embodied carbon of residential and non-residential buildings differs significantly, therefore, setting a single target for various development types is not appropriate.

In addition the South Staffordshire Council Local Plan Review: Sustainable Construction Policy NB6, Task A, Rev 3.0 report sets out no costs associated with the requirements of NB6C and no costs are included within the Viability Assessment to take account of potential cost implications of this policy. In this context we do not believe this policy has been adequately tested to meet the requirements of the NPPF and Planning Practice Guidance (PPG).

We therefore recommend that the Policy is updated to reducing embodied carbon where feasible and viable and removing the fixed target to ensure the policy is effective and deliverable.

### **Recommended Policy Updates**

Below we have set out some recommended amendments to Policy NB6C.

#### ***C1. Embodied carbon reporting***

All new residential and non-residential developments are encouraged to complete a whole-life carbon assessment in accordance with RICS Whole Life Carbon Assessment guidance.

### **C2. Limiting embodied carbon**

**Where feasible and viable.** Large-scale new residential (50 and above units) and non-residential (5000m<sup>2</sup> commercial floorspace) development to ~~limit~~ **reduce** embodied carbon (RICS modules A1 – A5) ~~to 550 kgCO<sub>2</sub>/m<sup>2</sup> GIA.~~

### **C3. Building end-of-life**

All new buildings are to be designed to enable easy material re-use and disassembly, subsequently reducing the need for end-of-life demolition.

### **C4. Demolition audits**

All major development that contains existing buildings/structures to carry out a pre-redevelopment and/or pre-demolition audit, following a well-established industry best practice method (e.g. BRE).

Development proposals should be consistent with other Local Plan policies.