

	<h2 style="margin: 0;">Local Plan</h2> <h3 style="margin: 0;">Publication Stage</h3> <h3 style="margin: 0;">Representation Form</h3>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

**South Staffordshire Council
Local Plan 2023 - 2041**

Please return to South Staffordshire Council by 12 noon Friday 31 May 2024

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Ms	Title	Ms
First Name	Sarah	First Name	Sarah
Last Name	Day	Last Name	Butterfield
Job Title (where relevant)		Job Title (where relevant)	
Organisation (where relevant)	Clowes Developments Ltd	Organisation (where relevant)	Pegasus Group
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Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	Objective 1,2 & 6	Policy	DS1, DS2, DS4, EC1,	Policies Map	
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4. Do you consider the Local Plan is:

(1) Legally compliant

Yes

No

(2) Sound

Yes

No

(3) Complies with the
Duty to co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached representations.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if



you are able to put forward your suggested revised wording of any policy or text.
Please be as precise as possible.

See attached representations

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

 YES

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

In order to present oral evidence in support of the representations.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Data Protection

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

Please return the form via email to localplans@sstaffs.gov.uk or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX

**SOUTH STAFFORDSHIRE LOCAL PLAN
PUBLICATION PLAN REGULATION 19
CONSULTATION APRIL–MAY 2024**

Land off B4176 and A449, Wall Heath

On behalf of Clowes Development

Date: May 2024 | Pegasus Ref: P24-1247



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
Draft	22/05/2024	HT/SB	SB	Client Issue
Final	30/05/2024	HT/SB	SB	Final Issue



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1. Executive Summary

- 1.1. There is a clear need to allocate further land for employment purposes to meet both the needs of South Staffordshire and the Black Country. Such an allocation should take place as close as possible to the Black Country boundary in order to help support the expansion of existing businesses in that area and land off A491/Wolverhampton Road Wall Heath is well placed to fulfil the needs of local businesses for future floorspace. As the Masterplan at Appendix 1 demonstrates, a very attractive scheme can be produced with a range of units set in an attractive landscape led setting, providing significant opportunities for biodiversity net gain and ensuring that local residential amenity is protected. A Vision Document is also attached to these representations at Appendix 3.
- 1.2. A failure to allocate such land will mean that the economic objectives of the Framework, particularly those set out at paragraphs 8a and 85 will not be met and there will then be consequences for the social aspects of the Framework with a lack of employment opportunities for the local population.
- 1.3. Although it is noted that the site is within the Green Belt, it is of course the case that all significant development in South Staffordshire, both to meet its own needs and those of the Black Country, are going to take place in Green Belt locations where they are best placed to meet the needs of employers and the population.
- 1.4. Indeed, if one is going to allocate land to meet the Black Country's employment overspill needs it makes sense for the site to be allocated as close as possible to the boundary of the Black Country to minimise journey to work distances and to provide ease of expansion for those businesses seeking new floorspace. Owing to the need to allocate more land to meet employment requirements in a location which is best able to provide sustainable patterns of growth, the release of the site is considered to constitute exceptional circumstances justifying a review of the Green Belt boundary through the Local Plan process. It will meet objectively assessed employment needs for both South Staffordshire and the Black Country.
- 1.5. A comprehensive review of the Green Belt considerations, in terms of purposes of Green Belt designation and review of boundaries in respect of Green Belt policy and the proposals map which seeks to remove the site from the Green Belt which will be consistent with the proposal to allocate the site for employment development as per this representation.



2. Introduction

- 2.1. This representation responds to the South Staffordshire District Council ('SSDC') Local Plan Review 'Publication Plan' ('the Plan') consultation held during 2024 and under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Representations are made with regard to the Plan itself and to the accompanying published evidence, having regard to the National Planning Policy Framework ('NPPF') December 2023.
- 2.2. This representation is made by Pegasus Group on behalf of Clowes Development (henceforth 'Clowes') who have a specific land interests at land off B4176 and A449, Wall Heath for employment development. A Site Location Plan is attached as Appendix 1.
- 2.3. Clowes has previously submitted details of the Site through the Regulation 18 Preferred Options Plan, as well as the earlier iteration of the Regulation 19 Publication Plan document consulted upon in 2022.
- 2.4. Amendments to the National Planning Policy Framework (NPPF) in December 2023 led to a review of the District's proposed spatial strategy across the Plan Period, resulting in the current version of the Publication Plan (2024). These representations respond to the Council's spatial strategy in accommodating growth across the Plan period up to 2041 including the release of Green Belt land, as well as other specific development management policies relevant to the delivery of employment land. Alongside representations to policies of the proposed Publication Plan.
- 2.5. The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The latest iteration of the NPPF (December 2023) sets out at paragraph 230 guidance on implementation and interim arrangements in relation to national policy. This sets out that where emerging local plans reach pre-submission consultation prior to 19th March 2024, plans will continue to be examined in the context of the previous September 2023 iteration of the Framework. Due to the publication of this round of consultation in April 2024, SSDC have prepared the Plan under the provisions of the latest NPPF December 2023 and these representations have been prepared accordingly having regard to this national policy context. To ensure the policies of the Plan are fully justified it is important that Plan policies are therefore consistent throughout with this new national policy framework.

2.6. The tests of soundness are set out in the NPPF (December 2023), paragraph 35. For a Plan to be sound, it must be:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

2.7. These tests of soundness, along with other legal and procedural requirements associated with the Plan-making process provide a contextual framework for these representations.

2.8. The representations are submitted via the Council’s online consultation portal and are intended to inform any further work the Council is yet to undertake.

Land off A491/Wolverhampton Road Wall Heath

2.9. Clowes’ land interests extend to 71.2 hectares and the indicative masterplan at Appendix 2 demonstrates how a range of, B2 and B8 could be delivered on the site with a combined floor area of 84,844 square metres.

2.10. The Site is deliverable, on a principal commuting route on the edge of a conurbation and it could help deliver improvements to the A449/B4176 road junction. It has the potential to deliver a meaningful contribution to new employment provision within South Staffordshire and assist in contributing to the unmet employment needs of neighbouring authorities.

2.11. The site is located on the boundary of South Staffordshire District With Dudley Metropolitan Borough Council (MBC). Land to the south of the site is within Dudley MBC’s area. The Site abuts the northern edge of the settlement of Wall Heath (Dudley MBC) with the southern



edge of the village of Himley (SSDC) to the north. The site is very well related to the Black Country and is capable of being served by public transport, a point accepted by the Council. Clowes also have land interests to the east of the A449 as identified in Appendix 1 which provides the potential opportunity for further employment development within Dudley MBC that would locationally relate well to the adjacent land parcels at Wall Heath.

- 2.12. The site is well defined by existing, physical boundaries meaning that, in Green Belt terms, its release from the Green Belt can be done so with identifiable boundaries containing the site. The site is also very well defined by its existing boundaries. A former railway line, now well wooded, provides an identifiable landscape feature and has been used to help contain the developed area which is shown on the Masterplan at Appendix 2, the settlement of Wall Heath to the south provides a physical southern boundary and the A449 trunk road provides an eastern boundary.
- 2.13. We note that the Council's assessment of the site has not identified any overriding terms why the site should not be developed in technical or environmental reasons. Although some minor work will be needed to the wooded area along the former railway line to accommodate access, this would have limited impact and would be fully mitigated with replacement planting. Indeed, as is shown on the illustrative Masterplan ample land is retained for biodiversity net gain purposes and, overall there will be an increase in tree planting across the site and is a key pedestrian link.
- 2.14. Clowes consider this Site would provide an ideal location to assist with meeting the needs of South Staffordshire and its neighbouring authorities in assisting in the delivery of employment development within the plan period. Clowes would welcome the opportunity to work with the Council to assist in delivering much needed jobs for local people as well as potential improvements to the road network in the immediate area.

3. Planning Policy Context

- 3.1. Clowes supports SSDC's review of the adopted South Staffordshire District Development Plan as required by Policy SAD1 of the Site Allocations Document ('SAD') 2018. This provides the opportunity for the Council to comprehensively review the Vision, Strategic Objectives, development requirements, spatial development strategy, and policies shaping detailed development proposals.

National Requirements for Plan-Making

- 3.2. The existing Core Strategy for South Staffordshire was adopted in 2012, and as such a holistic review of the Plan is overdue. A Local Plan review is also committed to within the Site Allocations Document 2018. This Local Plan Review will therefore ensure that an up-to-date Local Plan for South Staffordshire will be in place to support growth and meet future development needs across the Plan period.
- 3.3. The Publication Plan consultation follows previous consultations on the Local Plan review. This included in 2019 consultations on the Spatial Housing Strategy & Infrastructure Delivery document, along with consultation on the Preferred Options Regulation 18 Plan in 2021 and the previous Publication Plan in 2022.
- 3.4. Amendments to the National Planning Policy Framework (NPPF) in December 2023 led to a review of the District's proposed spatial strategy across the Plan Period, resulting in the current version of the Publication Plan (2024). Clowes have engaged at each stage of the plan making process. The current consultation document represents SSDC's final version of the Plan and is in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), having considered representations previously made to the Plan, as well as further evidence.
- 3.5. NPPF para 24 confirms that local planning authorities '*...are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.*' In the context of South Staffordshire, strategic matters include housing, employment, infrastructure, and the Green Belt.
- 3.6. Clowes supports SSDC's proactive approach in continuing with a review of the Local Plan, to ensure that an up-to-date policy framework exists within the District to guide growth to 2041



and to ensure that development is genuinely plan-led but would like to make some representations on the soundness of some parts of the Plan.

4. Vision, Strategic Objectives and Priorities

- 4.1. The Publication Plan (Regulation 19) identifies a number of 'Issues and Challenges' surrounding homes and communities, economic prosperity, and the natural and built environment. The Document goes on to present a 'Vision' based upon these issues and challenges, and a number of 'Strategic Objectives' by which the Vision can be achieved.
- 4.2. It is noted that the Vision remains broadly the same as that presented in the adopted Core Strategy with regard to the aspirations to protect and enhance the District's rural character, communities, and landscape.
- 4.3. The Plan's Vision and objectives should be amended to reflect the need to meet both the present and future which included the creation of thriving new places for people to work in, creating jobs within the District.
- 4.4. Strategic Objective 1 lacks clarity and does not define the exceptional circumstances for the release of Green Belt land as part of its strategy. It should be made clear that the need to identify land for growth and development over the Plan period, and beyond, means that there are exceptional circumstances arising which have required a full and detailed Green Belt boundary review, with a view to identifying land that it is proposed to be released from the Green Belt to meet the District's growth requirements.
- 4.1. In relation to Strategic Objective 2, reference is made to meeting the housing and employment needs of the District and a 'proportionate' contribution towards the unmet needs of the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') and wider Functional Economic Market Area. It is considered this could be strengthened in meeting the needs of both existing and new residents of the District and the GBBCHMA. SSDC must ensure specific consideration has been given to the District's ability to make a substantially larger contribution to unmet needs given it has a contiguous border with the West Midlands Conurbation. This will ensure the economic and social prosperity of communities throughout the District is supported. Greater recognition should be given to Tier 2 and 3 settlements as well as sites which relate well to the urban areas of adjoining authorities and can benefit from the sustainability of these locations including access to jobs, services, education, and public transport provision.

4.2. The 'Issues and Challenges for South Staffordshire' as identified through community engagement are identified at Table 2 (page 13) of the Plan. Most notably this highlights the District's 'weaknesses' as

- demographic imbalance with a higher-than-average proportion of residents aged 65+, and a projected decline in families and working age residents, with resultant threat to some service provision;
- reliance on neighbouring areas for higher order services and a dependency on their economic health for access to employment; and
- poor public transport connectivity in parts of the district.

4.3. Alongside this, other 'threats' to the District include the increasing pressure for development on land within the Green Belt to meet District's economic needs, housing needs, and the needs of adjoining areas, which if not properly managed, could threaten the quality and character of the district, along with the lack of available brownfield land.

4.4. With regard to Strategic Objective 6, the objective fails to embrace the need to accommodate the overspill employment requirements from adjoining local authorities in the Black Country. This essentially affects the Duty to Cooperate and is a fundamental element for the test of soundness. The failure to embrace this point means that the plan will fail on a fundamental point and will not be able to be found sound. We suggest that strategic objective 6 is amended by the addition of the following wording, which must then be carried through to relevant policies and land allocations:

*"Development and economic strategy that seeks to retain existing employment and fosters sustainable economic growth **including appropriate allocations to accommodate overspill employment land requirements from the Black Country**, encouraging inward investment and job creation and key sectors such as advanced manufacturing and providing the skills to enable residents to access these jobs."*

4.5. The emerging Plan provides the opportunity to support sustainable growth and positive change for the future of the District. Whilst the importance of brownfield sites is recognised, this has to be balanced alongside strategic growth within open countryside and through Green Belt release, which is necessary to overcome those weaknesses identified by SSDC,



ensuring the social and economic challenges of the District across the Plan period can be addressed in order to strengthen its future through the Plan period and beyond.

- 4.6. SSDC have acknowledged that public transport in parts of the District is poor however the District benefits hugely from its proximity to the adjoining West Midlands conurbation. Delivering a range of employment sites across the District, particularly those that encourage the use of and are located on or within close proximity to key transport infrastructure networks that benefit from access to cross-boundary bus and rail services should be promoted. This should be reflected within the Vision and strategic objectives for delivering development across the Plan period.

5. Development Strategy

Policy DS1 – Green Belt

- 5.1. Draft Policy DS1 is broadly in line with the relevant paragraphs of the NPPF relating to development within the Green Belt and is therefore supported. However, it should be noted that Clowes do not accept the Council's proposition that the Green Belt '*contributes towards rural character*'. Green Belt is a development restraint policy set out at Chapter 13 of the NPPF and is not a landscape or character policy. The NPPF outlines '*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*'. Therefore, the Council should amend the text within Policy DS1 and its supporting text to represent national policy.
- 5.2. In accordance with the Duty to Cooperate, which still remains, the Council must do its utmost to assist in meeting unmet needs across the employment and housing market area, particularly given SSDCs proximity to the West Midlands conurbation.
- 5.3. It is abundantly clear that South Staffordshire, being on the edge of the Black Country conurbation, will have to accept a significant amount of overspill development, for both housing and employment, both in this plan period and beyond.
- 5.4. The allocation of land at Wall Heath off the B1476 and A449 for employment is considered by Clowes to make a positive contribution to the local economy and can be delivered within the plan period going up to 2041. This is intended primarily to meet the overspill needs of the Black Country although will, of course, be able to accommodate needs of businesses in the South Staffordshire area seeking new floorspace.
- 5.5. In terms of Green Belt considerations, Clowes notes the content of paragraphs 5.1 to 5.3 of the Local Plan Review. It is pertinent to note that some 80% of the district is Green Belt and that all of the district adjoining the Black Country urban area is within the Green Belt. Further, as is explained in paragraph 5.3, the plan area has very limited amounts of previously developed land within the Green Belt which, in terms of both availability and location, could be released to meet employment needs of both the plan area itself and also any overspill needs from the Black Country.



- 5.6. It is inevitable, therefore, that any land identified for employment land overspill will have to take place on greenfield sites within the Green Belt where they are in a sustainable location to meet the reasonable overspill needs and to create sustainable patterns of development. We contend that any decision to allocate overspill land beyond the Green Belt i.e. in the small portion of South Staffordshire, which is not within Green Belt, would not be in a sustainable location and would lead to unsustainable patterns of transport and commuting and would not meet the needs of the businesses seeking new development opportunities which are best accommodated on the edge of the urban area.
- 5.7. There are locational benefits of the land at Wall Heath in terms of its size, containment, and ability to meet employment floorspace needs for local businesses. Insufficient land has been made available for overspill requirements and Clowes consider that further land needs to be released from the Green Belt. Given the locational relationship of the site to existing employment units at Pensnett Trading Estate and the Heathmill Road Trading Estate, which have seen businesses relocate due to the age of the units, not adequate for modern business operations and no further room to expand. If an alternative location in close proximity is not provided loss of jobs with businesses relocating, land at Wall Heath provides the opportunity for high quality, modern employment units within the local area. Additionally, the proposed landscape buffer incorporating publicly accessible open space to the north of the employment land parcel, as identified at Appendix 2, will retain the physical separation between the settlements of Himley and Wall Heath.
- 5.8. These arguments form the basis of an exceptional circumstances case for redrawing the Green Belt boundary to exclude the omission site from the Green Belt and to allow its allocation for employment development. In this representation it is considered that the implications of the release of land from the Green Belt in terms of the Green Belt objectives identified at paragraph 143 of the Framework (further commentary provided below) and also the approach which should be taken when identifying new boundaries as per paragraph 148 of the Framework

Green Belt Purposes

- a) *To check the unrestricted sprawl of large built up areas;* By allocating the site through the Local Plan process, the release of the site would form part of a planned review of the Green Belt as per the advice in paragraphs 5.1 to 5.3 of the LPR. The site benefits from having readily identifiable boundaries which ensure that, once released, formal boundaries will be identified

and this will again help to ensure the site is contained and there is no “unrestricted” sprawl of a large built up area

- b) *To prevent neighbouring towns merging into one another*; The site lies to the north of Wall Heath and to the south of the settlement of Himley. Neither settlements are classed as towns, so there is no conflict with this objective of Green Belt purposes.
- c) *To assist in safeguarding the countryside from encroachment*; As is explained at paragraphs 5.1 to 5.3 of the LPR, the Local Plan area does not benefit from large areas of non-Green Belt land adjoining the conurbation nor does it have large areas of previously developed sites which could be reallocated for employment purposes. It is inevitable, therefore, that to accommodate both the housing and employment needs of both South Staffordshire and the overspill requirements of the conurbation, that open countryside will need to be released for development. This cannot, therefore, be a factor which counts against the release of the Clowes site.
- d) *To preserve the setting and special character of historic towns*; The site does not form part of the setting or special character of a historic town and, therefore, no conflict arises in respect of this purpose.
- e) *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land*; Again, we refer to paragraph 5.3 of the LPR. It is clearly acknowledged by the Council that the plan area does not have significant parcels of derelict and other urban land which could be used for development.

5.9. Similarly, the adjoining Black Country conurbation is deficient in land supply to meet its housing and employment needs with the consequence that land outside of the urban area will have to be released for development. There is, therefore, no reasonable prospect of the development needs of the plan area or the overspill needs of the Black Country conurbation being met on recycled derelict or other urban land and, therefore, the release of the site would not have an implication for urban regeneration. Indeed the benefits are likely to be in the positive as, by releasing land to create new floorspace, there will be an opportunity for existing businesses in the area, including the Black Country, to grow and expand thereby freeing up existing floorspace for other businesses to start up and grow. Therefore it is likely that there will be a positive benefit in terms of urban regeneration.



- 5.10. We have had regard to the Council's assessment of the site in Green Belt terms and note that it is stated that the site performs an important Green Belt function. That, of course, must, in effect, be a truism since if the site did not form such a function it should not have been included in the Green Belt in the first place. However, an objective assessment of Green Belt purposes, as has been carried out above, demonstrates that there is no significant impact caused by the release of the site in terms of Green Belt objectives and it is clear that Green Belt land has to be released to meet development needs for both South Staffordshire and the Black Country conurbation.
- 5.11. The eastern edge of South Staffordshire's local authority boundary adjoins the local authority areas of Dudley and Wolverhampton with key transport infrastructure links running through South Staffordshire. The direct relationship between these adjoining urban authorities and South Staffordshire provides further support for the release of Green Belt land within the District to deliver the sites necessary to meet the clear unmet employment and housing need across the wider employment and housing market area. Proximity to these urban areas also enables sites, particularly those located on or close to key transport infrastructure networks to benefit from sustainable transport links including access to cross boundary bus and rail services consistent with the Plan's spatial strategy.
- 5.12. Paragraph 145 of the NPPF states that "*strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the Plan period.*" The 2024 Publication Plan is proposing some limited Green Belt amendments to meet proposed housing requirements. However, in order to address, the issues arising from the shortfall in housing and employment land in the conurbation, it is essential that Green Belt boundaries are defined now which will endure. The currently adopted Local Plan at Policy GB2 included safeguarded land in order to accommodate the longer term needs of the District. The Core Strategy was adopted in 2012 and so is now 12 years old. The NPPF highlights that Local Plans should be reviewed every 5 years so in effect the Core Strategy has endured two Local Plan cycles.
- 5.13. Turning to the requirements of paragraph 148 of the Framework, we note that the Green Belt boundary, once redrawn to accommodate the omission site, would help to meet requirements for sustainable development. It provides an opportunity for close links with the Black Country and the Council has previously acknowledges that the site is "*in close proximity to Dudley urban area there is a strong employment population catchment, whilst*

public transport networks operate around the site". Clearly, the sustainability credentials of the site have been established by the Council itself; it makes sense to release land which has close links to the conurbation rather than land which is further away and which will increase length of journeys.

- 5.14. In line with paragraph 148e of the Framework, the Green Belt boundaries will not need to be altered at the end of the plan period and, in accordance with 148f, the boundaries use physical features that are readily recognisable and will be permanent. To confirm, these comprise, on the eastern boundary the A449, on the northern boundary the B4176, on the north western boundary a strong buffer area and the curtilages of other land uses to the north, to the south west again the curtilages of other properties and a strong buffer area whilst to the south east the site is bordered by residential properties of Wall Heath which will be separated from the site and built development by a strong boundary and amenity buffer. These boundaries will be identifiable and enduring. These features are readily evident on the site plan attached at Appendix 2.
- 5.15. Clowes considers that the failure of the Council to allocate the site for employment development is not in accordance with the principles of the Duty to Cooperate process and also renders the plan unsound. In the context of the Duty to Cooperate, whilst it is acknowledged that the Council has been in discussions with neighbouring authorities, the extent of the employment land overspill has not been finalised and based on representations made by Clowers in respect of overall employment land requirements it is clear that South Staffordshire should be making a much greater contribution to the Black Country overspill and should be placing lesser reliance on contributions for the West Midlands Interchange, a development which is not geared to provide for the needs of local businesses.

Policy DS2 – Green Belt Compensatory Improvements

- 5.16. Policy DS2 provides additional detail on expected compensatory improvements for Green Belt released sites. Clowes supports the inclusion of a policy setting out the need for Green Belt compensation in relation to sites being removed from the Green Belt. However, despite representations set out as part of the earlier 2022 Publication Local Plan consultation, the policy still leaves elements of ambiguity and its practical application is unclear. Whilst it is appreciated that the SSDC have outlined that *'applicants must demonstrate proportionate compensatory improvements'*, this does not provide a clear requirement for Green Belt compensation, and a revised policy approach is preferred as outlined below.

- 5.17. Policy DS2 also sets out the following hierarchy for Green Belt compensation.
- a) *Compensatory improvements to remaining Green Belt land adjacent to, or in close proximity to the development site;*
 - b) *Compensatory improvements to remaining Green Belt land within the wider locality accommodating the development;*
 - c) *Compensatory improvements to remaining Green Belt land in an area identified through the council's latest Nature Recovery Network mapping or Open Space Strategy.*

In the event that it is robustly demonstrated that none of the above options can be satisfied (e.g., as land is demonstrably not available) then the council will accept a commuted sum that it will use to undertake compensatory improvements.

- 5.18. The hierarchical approach to the Green Belt compensation policy as drafted is not supported. Neither the NPPF nor the PPG refer to a hierarchy of preferred methods of Green Belt compensation. Furthermore, when assessing the policy, it is not at all clear that the preferred methods of Green Belt compensation would deliver a greater benefit than the approaches lower down the hierarchy.

- 5.19. In the first instance, it would appear that all of the potential methods (items a-c plus the penultimate paragraph) require some method of actually delivering the compensation. In practical terms, this is likely to be via a S106 agreement associated with a planning permission to develop the allocation (former Green Belt) site and which either delivers contributions towards compensatory improvements or requires the delivery of the identified improvements.

- 5.20. Whilst it is accepted that having the Green Belt compensation located close to the allocation could be advantageous and should be pursued, ultimately it is the overall value of that Green Belt improvement that is of greatest significance. There is also a suggestion within criterions a) and b) of the proposed policy that the preferred approach is reliant on the developer of the allocation owning additional land in the vicinity. This may not always be the case therefore, care must be taken to ensure that the application of the policy does not result in ransom type scenario. Similarly, a further issue relates to the potential for the lowest ranked element of the compensation hierarchy (the penultimate paragraph involving paying a

commuted sum) resulting in the same, or greater, benefit than compensation associated with the highest element in the hierarchy; especially if it results in significant improvements to an existing resource. This could be as a result of the contributions secured in a commuted sum being spent on public land next to the development site.

5.21. Therefore, other benefits associated with particular Green Belt compensation schemes which may be more significant than just proximity to the development site need to be explored further. For instance, the compensation could deliver enhancements to give greater public access to a recreation route such as a Canalside walk, or deliver improvements to a degraded nature conservation site. Such Green Belt compensation may deliver wider benefits than merely enhancing land in the immediate vicinity of the site. This has not been fully explored within the supporting evidence base when considering the release of Green Belt land, with the conclusions of the Green Belt Exceptional Circumstances Topic Paper 2024 only referring to the compensatory measures offered to the south of the larger Strategic Allocation of Land east of Billbrook.

5.22. In view of the above, it is suggested that the policy is amended to delete reference to the hierarchy and instead state that Green Belt compensation is required in conjunction with development of sites removed from the Green Belt which could include improvements to green infrastructure, woodland planting, landscape and visual enhancements, biodiversity improvements, new or enhanced cycle or walking routes and improved access to new, enhanced, or existing recreational and outdoor sports provision. The policy should also indicate that this can be delivered through direct improvements to land or via S106 contributions and the Council will seek the optimum public benefits in proportion to the scale of the site being removed from the Green Belt.

Policy DS4 – Development Needs

5.23. The employment figure set out in policy DS4 is not sound and the amount of land which needs to be found for development needs to be increased significantly. The policy should be amended by removal of references to contributions from WMI (which would otherwise be regarded as windfalls if they do meet the requirements for local businesses); this would mean that the amount of land to be developed to meet local needs should be increased by 18.8 hectares, the figure of 1.2 hectares to be discounted from surplus office floorspace should be removed from the figures and the contribution which will meet the Black Country overspill



should be reduced to 16.6 hectares in terms of the surplus element in the South Staffordshire supply.

- 5.24. Given the strong economic connections between South Staffordshire and the Black Country area, it is submitted that a further 84.6 hectares of land should be allocated under DS4 on top of the 107.45 ha identified and with an appropriate amendment made to the proposals map. This gives a total of 192.05 ha to be allocated (these would make up the 18.8 hectares lost from WMI for South Staffordshire and would also contribute to Black Country overspill for employment).
- 5.25. Land to the north of Wall Heath should be allocated for 80 hectares of mixed employment.
- 5.26. The EDNA update 2024 updates the earlier EDNA prepared by DLP Planning on behalf of SDDC to identify future employment needs across the South Staffordshire area for the period through to 2041. The updated Growth Forecast within the EDNA shows a growth of 5,326 net additional jobs in South Staffordshire over the period 2020-41, this takes into account a further increase in employment of +387 jobs versus the EDNA 2022, mainly concentrated in the Transport & Storage, Wholesale & Retail and Professional Services sectors which land at Wall Heath could assist in delivering.
- 5.27. Clowes considers that policy DS4 with regards to employment provision should align with the NPPF at para 86d which makes it clear the importance of policies being flexible to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances. The currently proposed approach is considered too restrictive and will put the District at a disadvantage in attracting good quality employment provision.

6. Development Management Policies

Policy EC1 – Sustainable Economic Growth

- 6.1. Policy EC1 identifies 6 strategic employment sites. However, of these, Hilton Cross is now largely developed and the West Midlands interchange is designed for regional/national requirements and is unlikely to meet the needs of local businesses.
- 6.2. Land at I54 is also largely taken up with only 2.4ha remaining. The proposed allocations for employment appear to largely be based around Wolverhampton. Clowes considers that SSDC, due to its locational relationship to a number of Black Country authorities need to allocate a balanced amount of employment sites in the Local Plan with regards to the variety of locations. In this context, further land needs to be developed and the policy should be amended to make it clear that other development opportunities are being brought forward to meet the needs of the Black Country overspill which have not been met. In this context, it is noteworthy that the policy does not make reference to meeting the wider needs of the adjacent authorities, specifically within the Black Country which the plan acknowledges is a key cross boundary issue.
- 6.3. Clowes considers that the Regulation 19 plan has failed to make proper provision for the employment needs of both South Staffordshire and the Black Country with an over-reliance upon the contribution which shall be made to employment supply from the West Midlands Interchange (“WMI”). That development is intended to serve regional/national companies with rail related aspirations. Such provision, whilst welcome in the overall economy, will not meet the needs of local businesses seeking new floorspace and development sites in South Staffordshire and the wider locality of the Black Country. Indeed, it is noteworthy that an element of the calculation for new land in the plan area has been based on past take up rates which would, of course, have been derived from local businesses and would not reflect any contribution made by WMI. Since WMI will meet the needs of a different category of employer, it is not appropriate to include it in the employment supply for the plan nor to suggest that it will accommodate elements of overspill of the Black Country employment land requirement.

- 6.4. In this context, the plan does not meet the Duty to Cooperate by failing to meet the needs of other authorities who have a functional and economic relationship with South Staffordshire.
- 6.5. Land off A491/Wolverhampton Road, Wall Heath would provide the Council with the opportunity to provide high quality employment with modern, flexible high-specification space near a large labour force on the edge of the Black Country Urban Area and within close proximity to the strategic road network.

Policy EC11- Infrastructure

- 6.6. We note that the policy commits the Council to work with and support infrastructure providers and also offers policy support for this. Any assessment of cumulative impact and mitigation requested must be proportionate and CIL Regulation 122 compliant. The policy should be explicit that this is the case.
- 6.7. In particular, the policy ought to make clear that infrastructure contributions can take a number of forms, individually attributing a proportion of the cost of an element of infrastructure.
- 6.8. The policy as currently drafted is considered unsound, as it is neither justified nor consistent with national policy for the reasons set out above.

EC12 – Sustainable Transport

- 6.9. The Policy sets out a number of criteria that all new developments will be required to follow. Point b) requires 'safe access and an acceptable degree of impact on the local highway network' to be demonstrated. The wording of the policy should, however, be revisited to ensure consistency with the NPPF Paragraph 115 which sets out that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe'.
- 6.10. As currently written the wording of point e) is unclear and lacks clarity in the context of the policy which relates to transport and the delivery of sustainable travel and is currently open to interpretation. In particular, it is unclear why a policy relating to sustainable transport is seeking to minimise the impact of noise. The policy should focus on the transport related element. A more appropriate form of wording is suggested as follows:

- 6.11. 'Where required, appropriate mitigation to address the impacts of any increased traffic (including cumulative impacts) associated with the proposed development shall be provided, either through direct improvements or Section 106 contributions where proportionate and CIL Regulation 122 compliant'
- 6.12. As currently written the policy is therefore considered unsound as it is not consistent with national policy for the reasons set out above.

NB1 – Protecting, enhancing, and expanding natural assets

- 6.13. The policy sets out that 'The developer must demonstrate through submission of documents that where a protected species mitigation licence is required from Natural England, that Natural England would be reasonably likely to grant this, and that the three tests under Regulation 55 sub-paragraphs (2)(e-g), and (9)(a-b) of the Conservation of Habitats and Species Regulations 2017 (as amended) would be met'.
- 6.14. Whilst important that consideration is given to the potential requirement for a species mitigation licence, this should be identified within the supporting policy text or the Natural Environment and Biodiversity SPD for information purposes only rather than under the provisions of planning policy. The requirement should therefore be deleted from Policy NB1.
- 6.15. The provisions of the policy, as currently written are reliant upon Natural England (NE) responding in relation to an initial licence application in advance of a formal application being submitted which is considered to be onerous and unnecessary given NE are not required to grant at this stage. It is likely that the details of the layout and associated mitigation may well evolve through the planning application process. Where appropriate, Natural England will have the opportunity to comment on a proposed development through the statutory application consultation process, whilst developers have the opportunity to seek advice in relation to the licence simultaneously alongside the planning application. To require this input 'upfront', has the potential to unnecessarily slow up the submission of applications and in turn planning permissions.
- 6.16. In referring to the best and most versatile agricultural land the policy sets out that it will be protected and enhanced. The NPPF (at paragraph 180) however recognises the economic and other benefits of agricultural land which should be considered in the overall planning balance alongside the provision of much needed homes to meet the District and the wider

GBBCHMA. The policy as currently drafted should be amended to accurately reflect the provisions of national policy.

- 6.17. The policy is considered unsound, as it is neither justified nor consistent with national policy for the reasons set out above.

Policy NB2 – Biodiversity

- 6.18. Clowes are supportive of the need to address net losses to Biodiversity, through the provision of enhancement to deliver an overall net gain. The Council’s policy requirement to deliver 10% Biodiversity Net Gain, reflects that of the Environment Act and is not objected to. However, given the 10% BNG is a mandatory requirement for all developments (subject to some exemptions) the detailed provisions included in Policy NB2 in relation to BNG are considered unnecessary and a duplication of national policy requirements (Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021)).
- 6.19. The Policy should therefore be simplified with clauses a)-c) deleted so as to avoid the potential for misinterpretation within the wording of the policy and confusion when read alongside the requirements of the Act and any associated guidance. Clause a) requires existing habitats on site to be maintained and enhanced as a priority. However, the Act requires the provision of 10% net gain having regard to the pre development biodiversity value of the site. This may involve the loss of existing habitats and replacing with new having regard to outputs of the statutory biodiversity Metric. At clause c) the policy also sets out a requirement to secure the habitat in perpetuity and where it is demonstrated this is not possible to secure the habitat for 30 years. This however exceeds the mandatory requirements set out at Schedule 7A of the T&C Planning Act 1990, which specifies that a habitat is to be secured for ‘at least 30 years after the development is completed’.
- 6.20. The Natural Environment and Biodiversity SPD provides the opportunity to expand upon the requirements of BNG at a national level where considered necessary and of assistance to the reader at a local level, including biodiversity enhancement projects where offsite net gains could be delivered in lieu of on site provision. The SPD should not seek any additional policy provisions to that identified under Policy NB2.

Policy NB4 – Landscape Character

6.21. Policy NB4 would benefit to an amendment in the text, which reflects the comments made on Policy NB2 above. As drafted, the second paragraph states:

"All trees, woodland, and hedgerows should be protected and retained"

6.22. Whilst it is appreciated that the following sentence identified that should a loss be required, appropriate mitigation measure must be delivered by the developer, the above sentence should be amended to the following:

"All trees, woodland and hedgerows should be protected and retained wherever possible"

6.23. It should also be noted within the policy however that despite the protection of trees and hedgerow wherever possible, in particular trees which contribute positively/are particularly important to the character and amenity value of the site, some loss of trees and hedgerows is likely to be inevitable as it almost always necessary to remove hedgerows to accommodate a vehicular access into the site or example.

NB6B - New build non-residential development (operational energy) Sustainable Construction

6.24. Clowes supports the Council's aspiration for major non-residential development to demonstrate compliance with the most recently applicable BREEAM Excellent standard. BREEAM Outstanding should be targeted and the proposal will be afforded weight in favour where this is achieved.

6.25. Notwithstanding the support, once again it should be noted that at the outline application stage for industrial and warehousing units, they will not necessarily be on a pre-let basis and therefore the occupier will not be known. In addition, there will be instances, whereby proposals will be providing flexibility to the partition units, etc, which will all have a bearing on the final specification of the building therefore the BREEAM calculator, or equivalent best practice standard, cannot be submitted as part of a planning application and therefore should be required prior to occupation.

NB6C - Embodied carbon and waste

6.26. Clowes fully appreciate the value of Whole Life-Cycle Carbon assessments and the need for some form of post construction, pre-occupation assessment. Whilst it is noted that the requirements in relation to embodied carbon have been revisited since the earlier 2022

iteration of the Publication Plan document, which now 'encourages' (at Clause C1) rather than requires all new residential development to complete a whole life carbon assessment there remains concern over the inclusion of the policy, in particular when read alongside paragraph 13.15 which sets out that the submission of information will be required at the post-completion stage via condition 'to verify that as built embodied carbon quantities remain compliant'.

- 6.27. Policy NB6C Clause C2 is considered unnecessary with Building Regulations instead providing the requirements that the construction of buildings should adhere to. There should be no expectation placed on builders to exceed national standards which have already been through vigorous viability testing and provide certainty for both housebuilders and developers.
- 6.28. Clause 3 in relation to 'easy material re-use and disassembly' and 'end of life demolition' is ambiguous and lacks clarity, placing reliance on further detail within an SPD. The SPD should do no more than clarify the Local Plan policy, and it is suggested that if the requirements for implementing the policy require explanation now, then these should either be included within the Plan Policy or set out within the explanatory text.
- 6.29. The requirement for an Energy Statement to accompany applications is referenced only within the supporting text at Paragraph 13.15. To ensure clarity to the reader reference to the provision of an Energy Statement if deemed necessary to deliver the requirements of Policy NB6C should be explicitly set out within the Policy itself rather than an afterthought. The purpose of an Energy Statement at the planning stages is however questioned given the requirements under Building Regulations to meet specific standards of construction in relation to energy efficiency for commercial development designed to address these requirements.
- 6.30. As currently drafted the policy is not considered to be adequately justified or consistent with national policy for the reasons set out above.

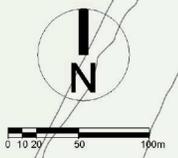


Appendix 1 – Site Location Plan and Clowes Land Interests





Appendix 2 – Site Masterplan



bhb
architects

3533 - Wall Heath, Staffordshire
Drawing SK04
Indicative Site Plan
Scale 1:2500 @ A1
13 / 12 / 2022



Appendix 3 – Vision Document

VISION DOCUMENT

LAND AT WALL HEATH

DECEMBER 2019





This Vision Document has been prepared on behalf of CWC Group by Harris Lamb Property Consultancy.

It has been informed by work undertaken by the wider consultant team which includes:

- > **HARRIS LAMB**
Planning
- > **BHB ARCHITECTS**
Masterplanning
- > **BWB CONSULTING LIMITED**
Flood Risk, Drainage and Highways
- > **HARRIS LAMB**
Environmental / Ecology
- > **TYLER GRANGE**
Landscape and Visual

The Vision Document and Masterplan contained within it is an evolving document and is subject to change as further information and supporting evidence is produced and/or comes to light. The current proposals are a first draft intended to stimulate discussion and will, therefore, evolve over time and should be read and considered in this context.

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P. 2	SECTION 1 THE VISION
P. 3 - 4	SECTION 2 INTRODUCTION
P. 5 - 12	SECTION 3 SITE AND SURROUNDINGS
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P. 41 - 43	SECTION 5 CONCEPT MASTERPLAN
P. 44	SECTION 6 CONCLUSIONS

PREFACE

This Vision Document has prepared on behalf of CWC Group to support the promotion of land at Wall Heath as a strategic employment site, which could deliver in the region of 84,844 m² of employment floorspace and new areas of open space and enhanced pedestrian and cycling routes to the benefit of the wider community.

The site is located within the administrative area of South Staffordshire District Council albeit that it is located immediately adjacent to the built-up edge of Dudley Metropolitan Borough Council, which forms part of the four Black Country councils (Dudley, Wolverhampton, Sandwell and Walsall).

This Vision Document is intended to assist the Council with its consideration of the land at Wall Heath and its suitability for removal from the Green Belt and allocation as a strategic employment site. To inform the Vision Document, an initial high-level assessment of baseline conditions at the site has been undertaken, which has identified any known constraints, but also highlighted opportunities for its future development. It confirms there are no technical or environmental constraints that would prevent the delivery of the site and that the development of the site could contribute to meeting the future employment land requirements of both South Staffordshire and the Black Country over the Plan Period.

A draft concept masterplan is included in the Vision Document, which sets out a number of principles to help guide the future development of the site to create a sustainable, high quality new employment development at Wall Heath.

SECTION 1 THE VISION

OUR VISION FOR THE LAND AT WALL HEATH

- › To create a high-quality strategic employment site.
- › Deliver in the region of approximately 84,844 m2 of employment floorspace.
- › To provide an appropriate mix of B1, B2 and B8 employment uses.
- › Create a sustainable and attractive environment where people would like to work.
- › Create new accessible and usable public open space to the north which would act as a strategic gap between the site and the village of Himley.
- › Implement a sustainable movement strategy where walking and cycling opportunities are integrated into the heart of the development.
- › To provide a substantial green buffer around the site which would protect the amenity of local residents in addition to wildlife habitats.
- › Protecting and enhancing existing wildlife habitats on site and providing a net gain in biodiversity.
- › Utilising Sustainable Urban Drainage Systems to manage flood risk and surface run-off.
- › To provide enhanced pedestrian and cycling links between the urban area of Wall Heath to the South to Himley to the north via the existing Himley 6 bridleway.
- › To provide a suitable access solution linking the site to the wider highway network.
- › To link the site to potential future residential development opportunities to the north of the site in the village of Himley.

The accompanying masterplan identifies how these principal matters can be incorporated in the development; it is intended to inform future discussions and studies regarding the potential of the site.

SECTION 2 INTRODUCTION

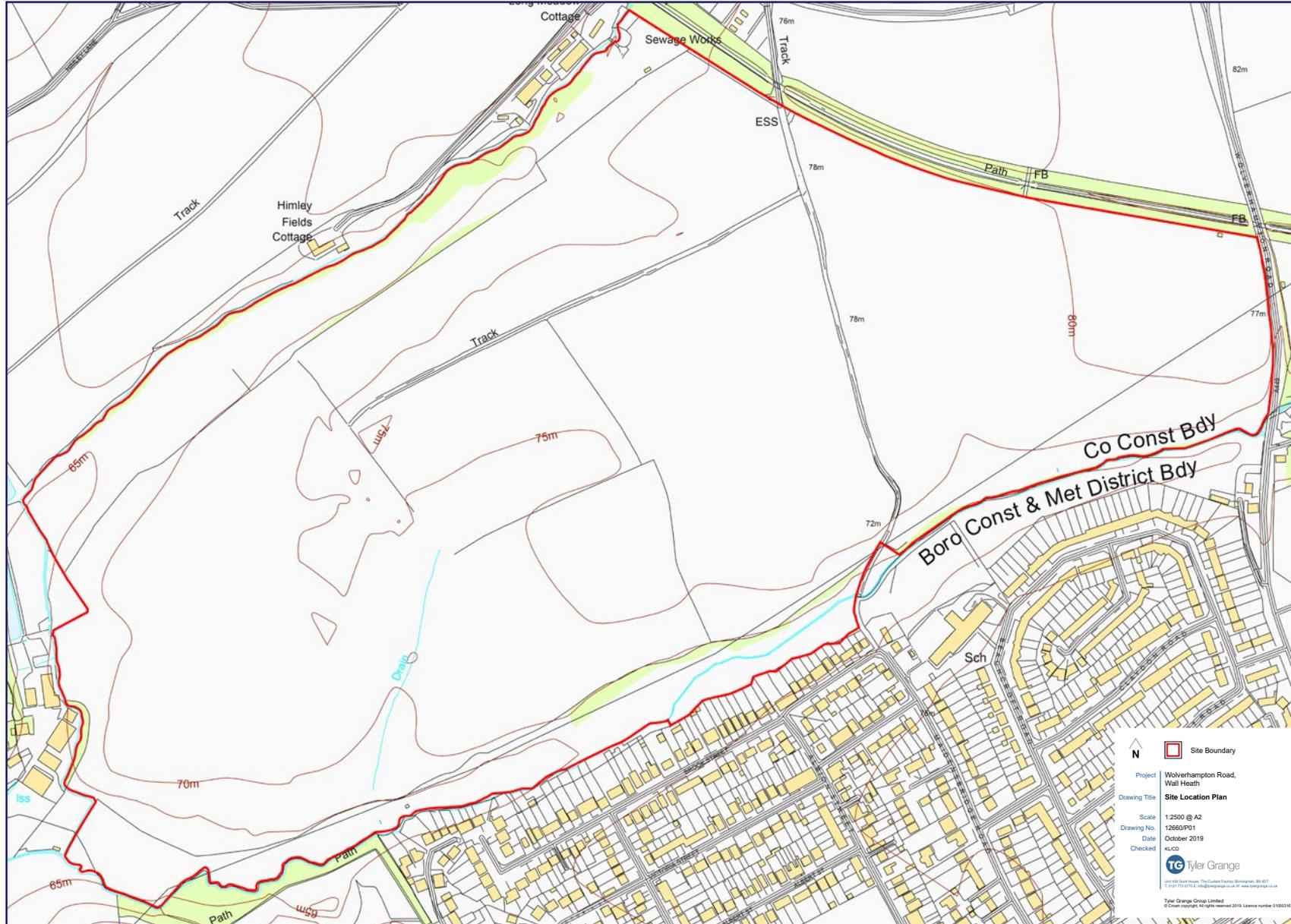
This Vision Document has been prepared by CWC Group to support the promotion of land at Wall Heath as a strategic employment site. The area of land being promoted extends to 71.2 hectares and is located within South Staffordshire albeit that it is located immediately adjacent to the built-up edge of Dudley Metropolitan Borough, which is within the Black Country. It is anticipated that the site will deliver in the region of 84,844 m² of employment floorspace and new areas of open space and enhanced pedestrian routes to the benefit of the wider community.

The site is being promoted for development within South Staffordshire's administrative area, who are currently reviewing their Development Plan and are, therefore, considering the potential of a range of sites within the District to meet its own employment requirements.

The land at Wall Heath is considered suitable to help meet the demand for employment land arising in South Staffordshire and the Black Country. The site is located within the administrative area of South Staffordshire, however, is directly adjacent to the urban edge of Wall Heath, which is within the administrative area of Dudley MBC, in the Black Country. Due to the site's proximity to Dudley, it is being promoted principally to meet the unmet employment needs of the Black Country, however, it will be down to South Staffordshire to allocate the land for development within the South Staffordshire Development Plan that is currently being reviewed.

The Vision Document, therefore, highlights the overarching need to meet the employment needs of South Staffordshire and the Black Country as a whole, by delivering a significant sized strategic employment site in a sustainable location, on the edge of Wall Heath. In doing so, it can help accommodate a significant proportion of the Black Country's unmet employment needs in a location that is well related to the main urban area and, therefore, well located to where the need is arising. The Vision Document also confirms that, following an assessment of initial baseline conditions, it is free from significant technical, physical or environmental constraints that would prevent its development.

PLAN 1 SITE LOCATION PLAN



 Site Boundary

N  Site Boundary

Project: Wolverhampton Road, Wall Heath
Drawing Title: **Site Location Plan**
Scale: 1:2500 @ A2
Drawing No: 12660/P01
Date: October 2019
Checked: KLCC

 **Tyler Grange**
Site: 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000

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SECTION 3 SITE AND SURROUNDINGS

SITE DESCRIPTION

The site is located on the northern periphery of Wall Heath, Kingswinford, a village which lies approximately 6 kilometres west of Dudley town centre. The site is approximately 71.2 hectares (see Site Location Plan).

The site comprises a number of irregular-shaped arable fields separated by mature hedgerows. The raised South Staffordshire Railway Walk with associated tree belt forms part of the site's northern boundary adding containment to the site. The Railway Walk is used as a cycle path and commuter route from Wolverhampton's Aldersley Stadium to Himley. Beyond the railway line to the north are agricultural fields and the B1476, which separates the site from the village of Himley. The eastern site boundary consists of the Wolverhampton Road and associated vegetation, whilst to the south lies the existing residential edge of Wall Heath (see Site Context Plan).

The site is shown to be generally raised above the surrounding area to the south and west, giving the appearance of an elevated plateau of land descending relatively steeply towards watercourses which are located along the northern, southern and western site boundaries. The topography within the site undulates, falling towards the northern, western and southern boundaries. The ground levels fall from approximately 82.0m Above Ordnance Datum (AOD) in the north-east to 62.5m AOD in the south.

A public right of way, known as the Himley 6 bridleway, dissects the site vertically, connecting Himley to the existing urban edge of Wall Heath to the south. A number of additional footpaths are shown on the Opportunities and Constraints Plan.

The site is strategically located near a number of settlements and employment sites within South Staffordshire District and the Black Country:

- > Himley Village 250m to the north
- > Wall Heath Village Centre 600m to the south
- > Swindon Village 700m to the west
- > Pensnett Trading Estate is approximately 1km east of the site at its nearest point. The Pensnett Estate is one of the largest secure industrial estates in Europe, comprising of 185 acres and home to almost 200 companies.
- > Wombourne Village 1.5km to the north
- > Brierley Hill Town Centre and Merry Hill shopping centre 5 kilometres to the south east
- > Stourbridge Town Centre is 6km to the south
- > Wolverhampton City Centre 8km to the north

PLAN 2 SITE CONTEXT PLAN



 Site Boundary

SOUTH STAFFORDSHIRE LOCAL PLAN

The South Staffordshire Local Plan consists of a number of statutory and non-statutory documents that together set out the planning policies and proposals to guide the development of the District. The Local Plan comprises the Core Strategy which was adopted in December 2012 and the Site Allocations Document, which was adopted in September 2018.

The Core Strategy

The Core Strategy is at the heart of the Local Plan and sets out the long-term vision, objectives and planning policies to deliver the vision and secure a sustainable future for the District. It has been informed by a number of strategies and assessments such as the Sustainable Community Strategy, Green Belt Assessment and Employment Studies.

The Core Strategy outlines that currently, 80% of South Staffordshire is designated Green Belt and the remaining area to the north is defined as Open Countryside. As such, Green Belt release is necessary to accommodate housing and employment growth.

South Staffordshire occupies a unique position on the edge of the West Midlands conurbation. There are around 30,000 jobs provided in South Staffordshire but many residents commute out of the District and into the conurbation and surrounding areas. Local residents rely heavily on nearby towns and cities such as Stafford, Cannock, Walsall, Wolverhampton, Dudley and Stourbridge for employment opportunities.

South Staffordshire has an important role to play in achieving economic growth within the West Midlands. The District Council has ambitions to harness the benefits that South Staffordshire has to offer by increasing employment opportunities and improving the sustainability of communities. Some Policies of note within the Core Strategy include:

Core Policy 1 – The Spatial Strategy for South Staffordshire

The general extent of the Green Belt and the area defined as Open Countryside will be protected and maintained for the Plan period, but some land will need to be released from the Green Belt and Open Countryside in some locations at the Main and Local Service Villages to deliver the proposed development strategy and enable the sustainable growth of these villages.

Core Policy 7: Employment and Economic Development

The Council, working in partnership with businesses and local communities, will support measures to sustain and develop the local economy of South Staffordshire and encourage opportunities for inward investment and further economic development of the District. The Council will support the development of creative and high technology industries at strategic employment sites in suitable locations within South Staffordshire. Measures to sustain the development of key economic sectors in the District, particularly manufacturing, storage and distribution, the service and tourism sectors will be encouraged and supported.

The Core Strategy also has a number of Strategic Objectives aiming to promote Economic Vibrancy in the District:

‘Strategic Objective 9

To meet local housing and employment needs, having regard to the Spatial Strategy for South Staffordshire, in a way that enables the existing villages within South Staffordshire to develop in a sustainable way that secures their future viability and prosperity, and supports the regeneration of rural communities and communities in neighbouring urban areas.

Strategic Objective 10

To support the urban regeneration of the Black Country Major Urban Area by distributing new housing and employment growth within South Staffordshire in a way that supports existing local communities and in particular discourages out-migration from the Black Country Major Urban Area.

Strategic Objective 11

To support the growth of a vibrant, prosperous and sustainable local economy; sustain, improve and enhance the vitality and viability of village centres and promote South Staffordshire as a tourist destination.

Strategic Objective 12

To support thriving and sustainable communities by ensuring that local people enjoy access to jobs and key services such as social, health care, education, open space and recreation, cultural and other facilities.

Strategic Objective 13

To reduce the need to travel, to secure improvements to public transport infrastructure and services and make it safer and easier for the community to travel to jobs and key services by sustainable forms of transport, such as public transport, walking and cycling.’

SOUTH STAFFORDSHIRE DISTRICT PLAN REVIEW

A new Local Plan is being prepared which will replace the existing Local Plan and will set out the spatial planning strategy for the District up to 2037.

The SAD commits South Staffordshire to carrying out an early review of the Local Plan in order to respond to the increasing need for development, both within South Staffordshire, and in neighbouring authorities, such as the Black Country. Agreeing to an early review of the Local Plan was an essential requirement of the Government's Planning Inspector who examined the SAD and was largely in response to unmet housing needs in both South Staffordshire and the wider region. This means that South Staffordshire must submit a reviewed Local Plan by 2021, which is earlier than previously anticipated (because the current Local Plan runs until 2028).

South Staffordshire Council has no choice but to undertake a review of the Local Plan to review the existing planning policy documents and determine the new Local Plan for South Staffordshire, which will identify the development needed within the district up until 2037. This will include residential, retail and employment uses. The Local Plan will allocate the sites required to deliver the identified level of development needed.

Local Planning Authorities have a duty to cooperate with neighbouring authorities and other prescribed bodies on strategic matters that cross administrative boundaries. Strategic matters can include housing, employment, infrastructure and the Green Belt.

The Council has been working collaboratively with neighbouring authorities on cross boundary issues for a number of years. A clear example of this is the role employment allocations in the Site Allocations Document (SAD) play in meeting some of the Black Country employment needs.

- › The Issues and Options consultation was the first stage of the Local Plan review. The consultation ran from Monday 8 October until 5pm Friday 30 November 2018.
- › South Staffordshire are consulting on the second stage of the Local Plan which is focused on broad locations for housing growth and the infrastructure required to deliver the growth. The consultation runs for 8 weeks from Thursday 17 October until 5pm Thursday 12 December 2019.
- › Issues regarding employment growth will be consulted on in at the Preferred Options stage, which is scheduled for summer 2020.

SITE ALLOCATIONS DOCUMENT

The SAD was adopted on 11 September 2018 and provides updated policy maps and policies in addition to changes to Green Belt and village development boundaries for housing, safeguarded land and employment sites.

The SAD identified land to meet development and growth needs, established new development boundaries and removed two previous 'Major Developed Sites (MDS)' from the Green Belt in line with 'Policy SAD6: Green Belt, Open Countryside and Development Boundary Amendments'. Given 80% of South Staffordshire is Green Belt, further land will need to be released to accommodate future growth requirements, through the local plan review.

LOCAL PLAN SPATIAL HOUSING STRATEGY AND INFRASTRUCTURE DELIVERY OCTOBER 2019

The second stage of consultation for the South Staffordshire Local Plan Review is regarding Spatial Housing Strategy and Infrastructure Delivery. Its focus is on housing growth in the district, looking at broad locations for growth and the infrastructure benefits that will be delivered as a consequence.

This consultation is not site specific but looks at broad locations for growth through the different options. Some development will be at villages, but to lessen the impact on these villages, urban extensions along the western and northern edge of the Black Country have been proposed which offer the opportunity to provide self-contained development that is located close to high level services and facilities in the conurbation. The six options are as follows:

- › Scoping Option A: Rural housing growth focused on the district's larger and better-connected villages
- › Scoping Option B: Rural Housing growth dispersed across all settlements with a basic level of service provision within the district
- › Scoping Option C: Small-scale urban extensions on the fringe of neighbouring urban
- › Scoping Option D: Larger urban extensions on the fringe of neighbouring urban areas
- › Scoping Option E: New freestanding settlements away from the existing villages/urban areas
- › Scoping Option F: Introduce minimum housing densities on all housing sites and intensify development within the existing village development boundaries
- › Scoping option G: Infrastructure-led development with a garden village area of search beyond the plan period

The Council's preferred approach, is Option G which is expected to meet the districts housing requirement, as well making a contribution (under the Duty to Cooperate) to the wider unmet housing need and also take account of the impact of development on current infrastructure and what opportunities there are for new and improved infrastructure. Option G proposes that 60% of housing is focused in Tier 1 to 4 Villages (60%), with 40% of development directed towards urban extensions and rural villages. This approach will lead to Green Belt release; however, this seems inevitable in light of South Staffordshire's highly limited urban capacity.

Whilst this Vision Document has been created primarily for the promotion of land at Wall Heath as a strategic employment site, it is also CWC Group's intention to promote their land interests to the south of Himley for residential development. The land in CWC Group's control is highlighted as a 'Potential Future Housing Development' on the masterplan and could form a well contained extension to the village of Himley that could assist in meeting the housing requirement of South Staffordshire and the Greater Birmingham and Black Country Housing Market Area. As it is located directly adjacent to the existing urban boundary, the land at Wall Heath and land to the south of Himley falls within the 'Proposed Area of Search for Urban Extension' as outlined by the consultation document.

STRATEGIC HOUSING & ECONOMIC LAND AVAILABILITY ASSESSMENT

The South Staffordshire Council Strategic Housing & Economic Land Availability Assessment (SHELAA) contains sites that have been suggested for housing or employment development.

The proposed development site has been identified as Site Ref.368, Land off Enville Road, Wall Heath. The site is considered 'Potentially suitable but subject to policy constraints - Green Belt & Core Policy 1.'

The Site Assessment text states: Site also suggested for employment, open space and community facilities. Part of site also suggested below. Currently quarry site for sand and gravel extraction. Larger part of site is cut off from access onto Enville Road to the south-west by Flood Zone 3, which cuts off this part of the site. The site is directly adjacent to the A449 to the east, which contains a lit footway leading to the Black Country urban area (Wall Heath) to the south. Therefore, on balance, the site is not considered to be disassociated from the urban edge. A PRoW runs through the site, and part of the site is within Flood Zone 3 and an SBI - these have been excluded from the gross site area, leaving approximately 62.26ha of land. Urban edge site modelled at 35 dwellings per hectare.'

SOUTH STAFFORDSHIRE ECONOMIC DEVELOPMENT NEEDS ASSESSMENT (EDNA)

In line with the national guidance requirements, South Staffordshire's EDNA (stage 1) has undertaken an analysis of South Staffordshire's Functional Economic Market Area (FEMA) and has identified South Staffordshire as being in the same FEMA as Cannock Chase district, Dudley, Walsall and Wolverhampton. The Black Country authorities acknowledge that they have a significant unmet need for employment land for their forthcoming plan period. They are undertaking further evidence gathering to see if they can reduce this gap (including further assessment of their urban capacity and a Green Belt Review), however it is acknowledged that three of the Black Country authorities are in the same FEMA as South Staffordshire, and therefore South Staffordshire may have a role in meeting some of their unmet employment land needs.

In order to accommodate the level of growth associated with the most likely scenario, the Black Country EDNA 2017 recommends that the review should plan for up to 800 ha of additional land to meet the needs of the Black Country for the period 2014-36 within the B1(b), B1(c), B2, B8 use classes and other ancillary uses normally located within employment areas.

A significant proportion of South Staffordshire's working population travels to work outside the district. The Black Country economy, and those of other adjoining authorities, is an important source of jobs for the residents of South Staffordshire and is an important factor in the prosperity of the district. Over recent years, South Staffordshire has aspired to provide more jobs locally, reduce levels of out commuting, and provide employment for residents of neighbouring areas, such as at i54 South Staffordshire. The economic inter-relationship between South Staffordshire and the Black Country is particularly strong with a key challenge to ensure that future cross boundary employment provision is mutually beneficial.

The Council's latest evidence on employment land requirements (EDNA stage 1, 2018) has found that the district has sufficient supply of available employment land to meet its own employment requirements over the plan period to 2037, with around a 20ha surplus. Notwithstanding this surplus, it is acknowledged that South Staffordshire may have a role in meeting cross boundary employment needs, particularly for the Black Country.

SECTION 4 ASSESSMENT OF BASELINE CONDITIONS

INTRODUCTION

To assist with the promotion of the site, CWC Group have instructed an initial high-level assessment of baseline conditions in order to understand if there are any potential 'in principle' constraints to the development of the site, but also to identify opportunities within which to bring forward new development. As such, a high-level assessment of existing highway conditions has been undertaken in order to inform an outline access strategy for the development. In addition, landscape character and visual impact of the proposed development has been considered in order to assess the ability of the landscape to accommodate development in this location. A Flood Risk and Drainage Appraisal has been undertaken to establish the existing conditions on site and inform the developable area. Finally, an ecological walkover survey has also been undertaken in order to understand the potential of the site to accommodate any protected species and if so, the likely mitigation that may be required in order to mitigate for these.

These investigations have informed our initial thoughts on how the site could be developed, and that will be needed to be implemented in order to bring the site forward. Similarly, they have also fed into the preparation of an initial concept masterplan for the site, that seeks to identify development principles at the outset that will guide the future development of the site.

As the site is currently located in the Green Belt, we have also assessed the contribution that it makes to the five purposes of including land in the Green Belt.

GREEN BELT

The site is currently located in the Green Belt, where there is a general presumption against inappropriate development. The Core Strategy is clear that protecting the Green Belt is a high priority for the Council, together with maintaining the distinctive local character and landscape of South Staffordshire. However, the Core Strategy is also clear that Green Belt release will be necessary to meet the growth requirements of the District.

The Policy of most relevance to landscape within the adopted Core Strategy, is Policy EQ4: Protecting and Enhancing the Character and Appearance of the Landscape which states that, 'The intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced.' It goes on to state that, 'Proposals should retain and strengthen the components of landscape character and local distinctiveness, with particular attention to the detailing of any proposal and its relationship with existing buildings, features and vegetation.'

Whilst the site is not covered by any landscape designations, it does currently lie within the Green Belt. Relevant SPD documents of note include the Staffordshire Landscape Character Assessment document. The key characteristics and landscape features of the area within which the site is located as identified by the landscape character assessment are considered in the Landscape and Visual Impacts section of this Document.

South Staffordshire undertook a Green Belt Study which was published in July 2019 to consider the potential of a number of sites to be released from the Green Belt in order to meet the future development needs of the District.

Within the study, the site falls within assessment parcel S71A, which is considered to make the following contribution to the five purposes of the Green Belt:

- › **Purpose 1: Checking unrestricted sprawl** – Strong contribution
- › **Purpose 2: Preventing merging towns** – Weak / No contribution
- › **Purpose 3: Safeguarding countryside from encroachment** – Strong contribution
- › **Purpose 4: Preserving setting and special character of historic towns** – Weak / No contribution
- › **Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land** – All of the parcels are considered to perform equally against purpose 5. It is acknowledged that Green Belt land needs to be released to meet the Councils housing and employment land requirements.

Notwithstanding the assessment of the site in the Green Belt Study, we have also assessed the site's performance against the five purposes of including land in the Green Belt (as set out in paragraph 134 of the Framework 2019).



View facing south east from the Himley 6 bridleway which dissects the site from north to south.



View facing south west from the Himley 6 bridleway which dissects the site from north to south.

The Sites Contribution to the Green Belt and suitability for release.

A review of the site's performance and suitability for release is summarised below in relation to the principal Green Belt objectives as set out within the National Planning Policy Framework (NPPF) (illustrated on the Opportunities and Constraints Plan).

The assessment does not include consideration of the fifth Green Belt purpose (to assist in urban regeneration through the recycling of derelict and other urban land), as all green field land is considered to contribute equally to this purpose, with the site making an equal contribution as the other greenfield land within the Green Belt around Wall Heath making an equal contribution in this regard.

This section sets out how the site performs in relation to the first four Green Belt purposes as well as opportunities for release of Green Belt land including a new, permanent, defensible Green Belt boundary (as shown on Opportunities and Constraints Plan). Consideration is also given to the potential for enhancements of land removed from the Green Belt for improved access and recreation, as well as biodiversity and landscape enhancements.

Purpose 1 – To check the unrestricted sprawl of large built up areas

The site is well contained; the South Staffordshire Railway Walk that forms part of the northern boundary is raised and is lined with tree belts and hedgerow, assisting towards the screening of views to the site from the north. To the northwest, mature tree belts assist to further screen the site with limited views possible beyond the boundary. The site sits adjacent to the existing urban extents of Wall Heath to the south adding further containment.

Considering the above, the site does not contribute to the preventing the unrestricted sprawl of Wall Heath, situated adjacent to the existing settlement edge, with development present to the west, east and north of the site and mature vegetation surrounding the site. Any sprawl would be contained by these existing surrounding features, with the South Staffordshire Railway Walk preventing the opportunity for sprawl and ensuring only a limited and localised impact. Furthermore, land to the north of the site is within the control of CWC Group, who intend on using the land as public open space, acting as a strategic green gap between the development site and Himley.



View facing south west from the Himley 7 footpath to the north of the site.



View facing east from the Swindon 2 footpath near Hinksford Farm.

Purpose 2 – To prevent neighbouring towns merging into one another

The physical and visual containment of the site and the raised South Staffordshire Railway Walk to the north provides separation with adjacent towns. The site does form part of the separation of Wall Heath and Himley, a small settlement to the north, however, the South Staffordshire Railway walk ensures no connection either visually or physically is made and therefore the separation remains.

There are development opportunities for the strengthening of the boundary along the eastern edge adjacent to Wolverhampton Road. Although the site is at a higher level, enhancement of the boundary could be ensured to avoid views of the development, although building heights are to be limited towards the western, northern and eastern boundaries to help limit visibility of rooftops. The enhancement of the already mature boundary to the west would form the new, permanent Green Belt boundary, assisting to prevent visual encroachment on local settlements.

Purpose 3 - To assist in safeguarding the countryside from encroachment

The site is located adjacent to the existing settlement edge of Wall Heath to the south, bound by a Road network and scattered farms and businesses with the South Staffordshire Railway Walk to the north. This places the site within an urban fringe context of existing development, limiting the contribution the site makes to safeguarding the countryside from encroachment.

Although trees and hedgerows surround the site, they are gappy in places and the opportunity exists to bolster them with new strategic tree planting, adding to the containment.

It is inevitable that some land will need to be released from the Green Belt to meet the needs of Birmingham and Black Country HMA and so some loss of open countryside will be required

Purpose 4 - To preserve the setting and special character of historic towns.

There are no features of historic significance in the parcel or visible from within it. Wall Heath is not identified as a historic town of importance. Considering the above, the site does not contribute to the preservation of the setting and special character of historic towns.



View facing north from Enville Road.



View facing north from Blaze Hill Road.

Opportunities for the Release of Green Belt

As considered above, the site makes a limited contribution to Green Belt purposes and the function of the Green Belt within the wider surrounding area. The site is contained by recognisable boundaries in the form of the raised South Staffordshire Railway Walk to the north and the mature tree belts and historic field boundaries to the west.

Although development of the site would lead to the loss of a number of arable fields, the function of the wider Green Belt in checking unrestricted sprawl and preventing coalescence of settlements would be retained. Any loss of land to development would be limited and localised.

As set out at paragraph 139 of the 2019 NPPF, when defining Green Belt boundaries, plans should 'define boundaries clearly using physical features that are readily recognisable and likely to be permanent'. The existing boundary vegetation, hedgerows and hedgerow trees, assist with enhancing the boundaries that could comfortably accommodate permanent, defensible new Green Belt boundaries and enhance those formed by the former Railway line to the north, Wolverhampton Road to the east and the farm buildings and businesses to the west.

The proposed new Green Belt boundary is shown on the Opportunities and Constraints Plan.

In addition to requiring the release of Green belt land to be clearly defined by robust new Green Belt boundaries, the NPPF also considers at paragraph 138 that plans should, '...set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

Although the site does not offer the opportunity for enhancement of land retained in the Green Belt, it does offer the opportunities for enhancements through the provision of accessible open space within the proposed development. As illustrated on the Opportunities and Constraints Plan, there are further opportunities for this space to be enhanced with characteristic new structure planting to assist with filtering views of the proposed commercial development, as well as being managed for wildlife and biodiversity benefits.

The July 2019 update to the Planning Practice Guidance (PPG) provides additional information on the role of the Green Belt in the planning system to supplement Section 13 of the NPPF.

It identifies three changes; firstly identifying 'what factors can be taken into account when considering the potential impact of development on the openness of the Green Belt'. It further states how 'plans might set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements'. It finally identifies how the 'strategic policy-making authority ensure that compensatory improvements to the environmental quality and accessibility of the Green Belt can be secured'.



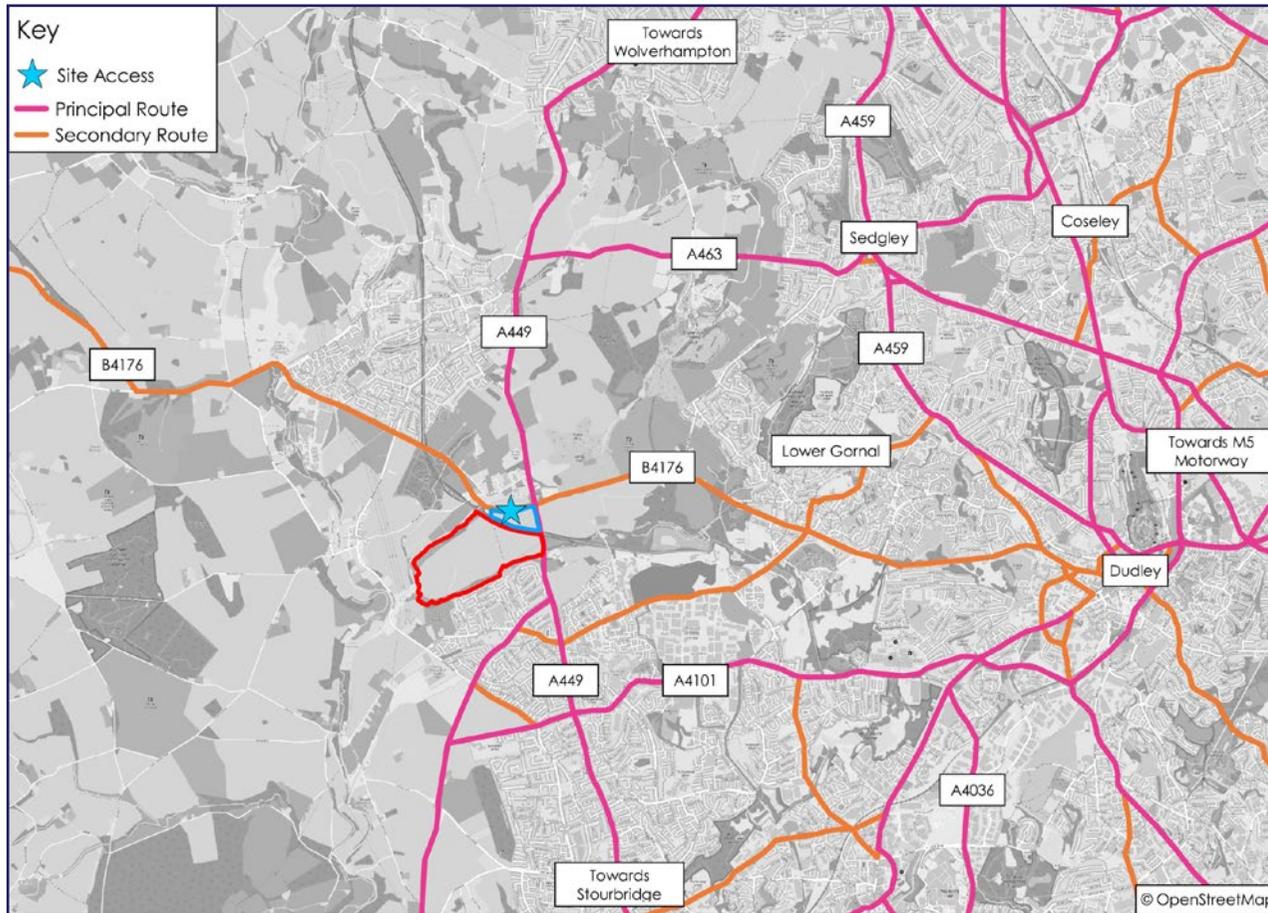
View facing east from the Himley 6 bridleway which dissects the site from north to south.



View facing west from the Himley 6 bridleway which dissects the site from north to south.

HIGHWAYS AND TRANSPORTATION

An Access and Highway Impact Appraisal was completed to examine the transport implications of developing the Wall Heath site to provide an employment development (B1/B2/B8 use) of circa 86,701 m².



Existing Conditions

The proposed site is located to the south of the B4176 and to the west of the A449 Wolverhampton Road. The A449 provides a link between Wolverhampton Centre to the north east and Kidderminster to the south west. The A449 continues past Wolverhampton and provides a link to the M54 motorway at junction 2 and subsequently provides access to the strategic highway network.

The B4176 provides a link between Dudley centre to the east of the proposed development and Telford to the northwest. The junction between the B4176 and A449 comprises a four-arm signalised cross roads to the east of the proposed development site.

PLAN 4 WIDER HIGHWAY (FIGURE 1)

Access

Primary vehicle access will be taken from the B4176 in the form of a three-arm signalised junction. A HGV vehicle tracking assessment has also been undertaken of the proposed access determining that it can accommodate the potential HGV movements.

Emergency accesses could potentially be achieved to the west of the proposed access on B4176 using the existing track, as well as via a left in/ left out arrangement on the A449 Wolverhampton Road to the east of the site if necessary, which could also form a secondary/bus only access.

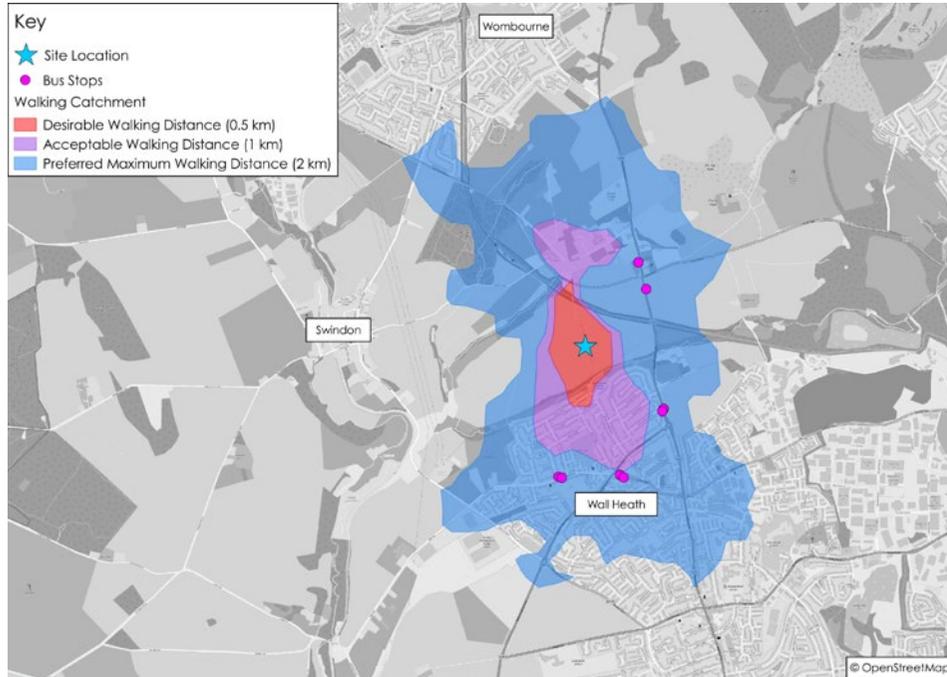


View from B4176 to the north of the site, showing the South Staffordshire Railway Walk.

Sustainable Transport

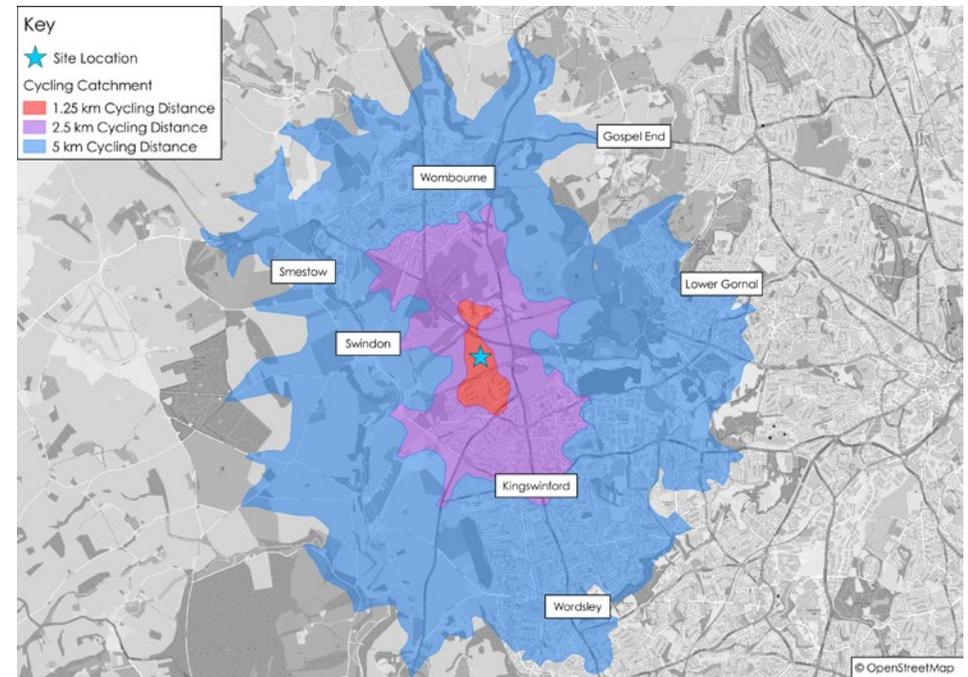
A pedestrian footway is present on the northern side of the B4176 and the eastern side of Wolverhampton Road. The South Staffordshire Railway Walk intersects the site and routes towards Wombourne to the north and Gornal Wood to the east.

Bridleway 'Himley CP 6' routes north/south through the site between the B4176 to the north and the residential estate to the south in Wall Heath.



PLAN 7 WALKING CATCHMENT (FIGURE 2)

Figure 2 shows a 2km walking catchment from the proposed development site that encompasses parts of Wall Heath to the south of the development site and extends towards Wombourne to the north.



PLAN 8 CYCLE CATCHMENT (FIGURE 3)

Figure 3 shows a 5km cycle catchment from the proposed development site that encompasses Wombourne to the north, Lower Gornal to the east, Kingswinford to the south and Swindon and Smestow to the west of the proposed development.

The nearest bus stops to the site are located on The A449 Wolverhampton Road that are served by the service number 16 Wolverhampton to Stourbridge which is operated by National Express West Midlands (**NXWM**). This service operates on a half hourly frequency Monday to Saturday. In addition, the number 15 is located to the south of the site and operates between Wolverhampton and Merry Hill Shopping Centre. This service operates with a 15-minute frequency thought the day Monday to Saturday. An hourly service runs for both the 15 and 16 on a Sunday.

Both bus services route to Wolverhampton bus station which is within convenient walking distance of Wolverhampton Railway Station. The station provides regular services to and from Birmingham.

Footway and cycleway links will be provided throughout the site to encourage active travel by the employees. These routes will also connect to the existing off-site infrastructure to allow pedestrian and cycle travel to off-site destinations. A detailed review of the walking and cycling infrastructure will be undertaken and improvements will be identified where required.

The existing bus services are located outside of convenient walking distance of some of the development parcels, and therefore a new or improved existing bus service may be required to ensure that all employees have the opportunity to travel by bus. A public transport strategy will be developed in consultation with the local bus companies and the local highway authority to identify the preferred option for serving the site. Options could include the extension of one of the existing services to loop through the site, either via an internal loop or by using two access points. Alternatively, a new service could be introduced which would route between the site and bus/railway stations at Stourbridge.

Both vehicle and cycle parking provision on site would be provided in accordance with the local parking standards.



Trip Generation and Distribution

To quantify the impact of the proposed development on the local transport system, the number of vehicle trips for all modes of transport that are likely to be generated by the development should be calculated. As such, BWB forecasted the likely trips generated by all modes for the proposed development during the morning peak hour and in the evening peak hour (08:00 – 09:00 and 17:00 – 18:00).

The trip generation assessment forecast a total of:

- > 41 two-way trips for pedestrians and cyclists in the morning peak hour and 35 in the evening peak hour.
- > 371 two-way trips for car drivers in the morning peak period and 312 two-way trips in the evening peak period.
- > 75 two-way trips for HGVs in the morning peak period and 34 two-way trips for HGV's in the evening peak period.
- > 31 two-way bus trips are forecast in the morning peak period and 26 two- way trips in the evening peak period
- > 2 two-way rail trips in the morning peak period and 1 in the evening peak period.

Modal Split

To provide a more accurate representation of the forecast modal split anticipated at the proposed development, the journey to work data for the daytime population has been based on the 2011 census 'location of usual residence and place of work by method of travel to work' data MSOA 'Dudley 012' that contains the Pensnett Estate that is located approximately 2.4km by road to the southeast of the proposed development and provides a similar setting to the proposed development.

The data indicates that currently approximately 83.2% of trips are made by private car with 6.7% made by public transport and 8.4% are walking / cycling trips.

Distribution

Trip distribution patterns have been based on the 2011 census 'location of usual residence and place of work by method of travel to work' data MSOA 'Dudley 012'. The origins for all vehicle trips to the area were separated from the data and a percentage demand was derived for all of the destination for light vehicle driver trips using the most appropriate routes from each zone.

It is expected that 8% of trips will travel north on the A449 Stourbridge Road, 45% will use the B4176 to the east of the proposed development, 35% travel south on the A449 Wolverhampton Road and 12% travel west on the B4176.

It is expected that 36 two-way trips will travel to/from the north on the A449 Stourbridge Road in the AM peak with 28 in the PM peak, 201 trips will use the B4176 to/from the east of the proposed development in the AM with 156 trips in the PM, 156 trips will travel to/from the south on the A449 Wolverhampton Road in the AM peak with 121 trips in the PM peak and 53 trips travel to/from the west on the B4176 in the AM peak and 41 trips in the PM peak.

Conclusion

In conclusion, we have considered the existing and potential future conditions and impacts of the proposed development. Consequently, there are no transport reasons as to why the site should not be allocated for employment use.

It should be noted that at this stage, this assessment has been produced to address the feasibility of the development site to inform the Local Plan. However, a Transport Assessment would also be produced as part of any future planning application.

LANDSCAPE AND VISUAL

A Landscape Technical Note and Opportunities and Constraints Plan were undertaken following desktop analysis and preliminary fieldwork undertaken in September 2019. The note provides advice on the feasibility of future employment development in terms of landscape character and visual context. Consideration is also given to the contribution that the site makes to the Green Belt, as well as opportunities for release of the site, new Green Belt boundaries and any associated mitigation and enhancement.

Landscape Character Context

The site is situated within the Sandstone Estatelands Character Area, described within the Staffordshire County Council's Planning for Landscape Change SPG 1996-2011.

The key characteristics of the Sandstone Estatelands include:

- > "A gently rolling, featureless landscape;
- > Remnants of silver birch woodland and heathland species present in the hedgerows;
- > Sparsely settled pattern of expanded hamlets and isolated large farms and estate buildings;
- > Straight minor roads;
- > Silver birch woodlands;
- > Well-treed stream corridors; and
- > Intensive arable agriculture in an open remnant field pattern."

Incongruous features in the area identified by the SPD include the following:

- > "Hedgerow removal along roadsides;
- > Field trees;
- > Badly designed farm reservoirs;
- > Large modern farm buildings and improved commuter properties; and
- > Power lines."

The SPD also states that there is very high potential value of new woodland planting “to restore the landscape structure of this open featureless arable farmland, to screen or direct views away from inappropriate development.”

Field observations confirm the site and surrounding locality is representative of the Sandstone Estatelands character area, although there are opportunities for enhancements within the site that would assist in providing a sympathetic characteristic settlement edge to Wall Heath.

The site itself comprises a number of irregular-shaped arable fields separated by mature hedgerows, located adjacent to the north of the existing settlement edge of Wall Heath. The mature trees associated with the watercourse along the southern boundary provide containment whilst still retaining a connection with the built residential edge. The Site Context Plan shows that to the east, Wolverhampton Road provides a strong boundary although is at a lower level than the site, surrounded by undulating topography. To the north, the raised South Staffordshire Railway Walk completes the boundary, with mature tree planting along the steep sides.

To the west, the existing farm buildings and associated businesses provide a further built-form/commercial influence to the site. Mature vegetation to the north west assists with the contained nature of the site in addition to the topography.

Hedgerows provide structure to the site, defining the open parcels of arable land, although historic maps identify the loss of historic hedgerows resulting in the larger field parcels. This provides an opportunity for the reinstatement of hedgerows to define developable parcels (as shown on the Opportunities and Constraints Plan).

Visual Context

The visual envelope of the site is limited to the local surroundings due to the boundaries and surrounding mature tree and hedgerow vegetation. The topography is undulating both within the site and surrounding it, although within the area it generally stays consistent, limiting the possibility of distant views.

Local views into the site are obtained from the raised South Staffordshire Railway Walk (a long distant route which borders the site to the north) when facing south/southwest; trees and boundary hedgerows assist to filter views directly into the site at certain points, although gaps provide clear views of both the site and of the existing residential edge to the south. Although the former railway route allows for views for recreational users of the footpath, due to it being raised with planted sides, visibility towards the site from the north are screened.

The Himley 6 bridleway dissects the site from north to south, facing south east and south west. The site is generally flat but expansive in these locations. The mature tree belt on the north, east and southern site peripheries, for the most part screens the site from views inwards.

The closest conservation area lies to the north east of the site at Himley although due to intervening vegetation and the road network, the site is not intervisible with the conservation area. However, roofs of proposed development could potentially be visible, although the Himley Conservation Area document identifies no key views that need to be retained or protected; simply the buildings and features within the area that must be protected.

Recommendations and Summary Conclusion

A series of recommendations are set out on the Opportunities and Constraints Plan relating to the desktop study and field observations undertaken to date.

In summary:

- › Development of the site presents an opportunity to restore lost field boundary vegetation with characteristic hedgerow planting. This could be used to influence the development layout whilst improving biodiversity benefits;
- › Development set-back with areas of additional tree and hedgerow planting required at the site's eastern, northern and western boundaries to assist with the filtering of development above existing boundary trees from Wolverhampton Road and public areas/routes to the west and north;
- › Large area of public open space, with the potential for additional soft landscaping and new Green Infrastructure links through the site;
- › Opportunity to incorporate footpath links to the wider footpath network (South Staffordshire Railway Walk);
- › Building heights/zones to be sympathetic of the surrounding landscape, with heights limited to the northern, western and eastern edges to limit visibility above boundary vegetation etc;
- › Opportunity incorporating SuDS and biodiversity benefits and form part of an open space through the development linking with other spaces across the site; and
- › Retained mature tree planting/hedgerows will continue to provide biodiversity benefits and improve the visual appearance of the commercial additions within the site.

PLAN 9 OPPORTUNITIES AND CONSTRAINTS PLAN



-  Site Boundary
-  Potential Developable Area
-  Potential Area for Public Open Space/
Green Infrastructure/RPA Off-sets
-  Existing Public Right of Way
-  South Staffordshire Railway Walk
-  Existing Internal and Boundary Hedgerows/
Trees to be Retained Where Possible
-  Proposed Tree Planting
-  Indicative Proposed Open Space Tree
Planting
-  Grade II Listed Building
-  Existing Retained and Enhanced
Hedgerows
-  Proposed Hedgerows
-  New Permanent Green Belt Boundary
-  Potential Location for Access



View facing south west from the South Staffordshire Railway Walk.



View facing south from the South Staffordshire Railway Walk.

ECOLOGY

A Preliminary Ecological Appraisal (PEA) has been undertaken, which included an Extended Phase 1 Habitat Survey of the site in October 2019 by a suitably experienced ecologist. Desk-based consultation was also undertaken with Staffordshire Ecological Record Centre and EcoRecord for records of protected species and habitats within 2km of the site. The purpose of the PEA is to identify the potential ecological constraints within, or near the site, that should be considered within the future scheme design. It also seeks to identify the likely requirement for further surveys required to inform an ecological assessment accompanying a future planning application.

Methodology

The desktop study was undertaken in October 2019 and included:

- › EcoRecord and Staffordshire Ecological Record Centre (SERC),
- › Multi Agency Geographic Information for the Countryside (MAGIC) website,
- › Ordnance Survey (OS), and
- › Aerial imagery.

The geographical extent of the search area for biodiversity information was related to the significance of sites and species and potential zones of influence which might arise from development within the site. For this site the following search areas were considered to be appropriate:

- › 10km around the site boundary for sites of International Importance (e.g. Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site));
- › 2km around the site boundary for sites of National or Regional Importance (e.g. Sites of Special Scientific Interest (SSSI)), protected or otherwise notable species and non-statutory designated sites of County Importance (e.g. Local Wildlife Sites (LWS));
- › 1km for ancient woodland, and
- › 2km for biological records (post-2000).

On 11th October 2019, HLPC carried out an Extended Phase 1 Habitat Survey of the site. The survey was carried out by HLPC Principal Ecologist and was undertaken in accordance with 'Extended Phase 1' methodology Joint Nature Conservation Committee (2010) Handbook for Phase 1 Habitat Survey. A Technique for Environmental Audit. Specific habitat features were mapped using Target Notes (TN) to record ecological features of particular note.

Ecological designations

Internationally designated sites for nature conservation

Fens Pool SAC, located approximately 3.5 km south-east of the site, supports a variety of terrestrial and aquatic/semi-aquatic habitats and is primarily designated for supporting a large population of great crested newts.

Fens Pool SAC is considered to be of international importance to nature conservation.

Nationally designated sites for nature conservation designation

South Staffordshire Railway Walk, a site nationally designated as a Local Nature Reserve (LNR), is located adjacent to the north-east of the site. The LNR comprises woodland with small areas of scrub, tall herb and fen and grassland which support a variety of bird species.

Wom Brook Walk LNR is located 1.9km to the north of the site. The LNR consists of a brook, woodland and open spaces which support a range of bird species and water vole.

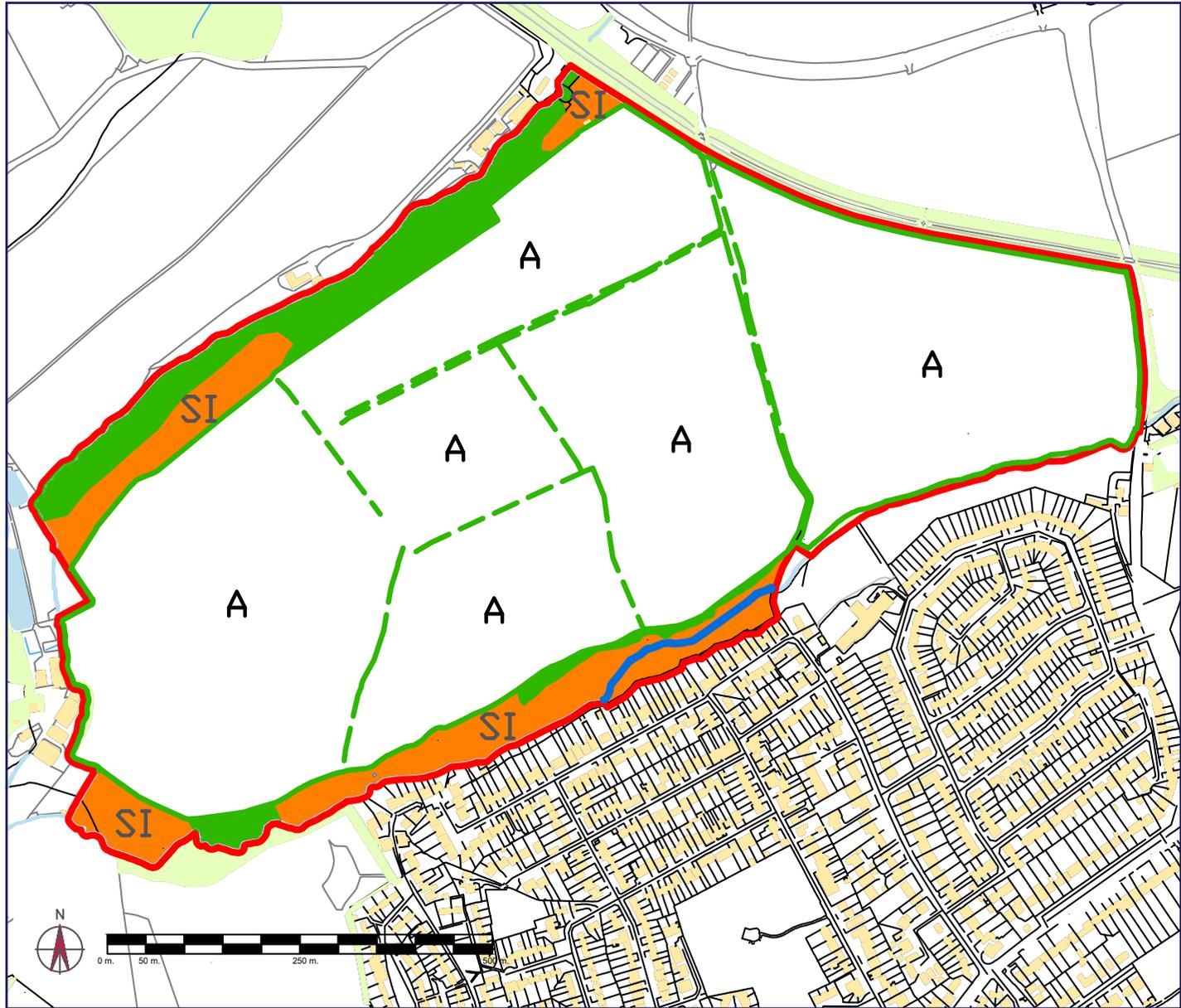
These sites are considered to be important for nature conservation at a district-national level.

Non-statutorily designated sites for nature conservation designation

32 non-statutorily designated sites for nature conservation (Local Wildlife Sites (LWS), Biodiversity Alert Sites (BAS), Sites of Importance for Nature Conservation (SINC), Sites of Local Importance for Nature Conservation (SLINC) and Potential Sites of Importance (PSI)) were identified within 2km of the site. The closest sites are:

- › Himley Fields (land at), Hinksford Farm LWS which is located on site, along the northern boundary and is designated for woodland, scrub, tall herb and fen, grassland, swamp, open water.
- › Kingswinford Railway Walk, a retained BAS, which is located adjacent to the north-east of the site and is designated for woodland, scrub, tall herb and fen, grassland.
- › Holbeache Brook Valley SLINC, which is located adjacent south-east of the site and is known for wooded stream valley and adjacent grassland forming a habitat corridor link with the Staffordshire Countryside.

PLAN 10 PHASE 1 HABITAT MAP



NOTATION:

-  Application boundary
-  Arable
-  Semi-improved grassland
-  Broad-leaved woodland
-  Hedgerow defunct
-  Hedgerow intact
-  Watercourse

Summary of Assessment

Depending on the location and extent of the works, Staffordshire Railway Walk LNR (which forms the sites north-eastern boundary), Himley Fields LWS (which is on site along the northern boundary) and Holbeache Brooke Valley SLINC (which is adjacent to the south-east of the site) could be affected by future development of the site. No other statutory designated sites, non-statutory designated sites or ancient woodlands are anticipated to be negatively affected by the proposed scheme.

The site has potential to support great crested newt, reptiles, bats, badger, water vole, otter, white-clawed crayfish and nesting birds. Depending on the location, timings and extent of the works, recommendations have been made for great crested newt, reptile, bat, badger otter and water vole surveys ahead of site preparatory works. Vegetation removal should avoid the nesting bird season which runs from March to August inclusive, or alternatively be preceded by a nesting bird check from an experienced ecologist. The invasive non-native species Himalayan balsam is also present at the boundaries of the site. Biosecurity and management of this species will need to be considered.

This suite of ecology surveys would be required to inform the design of a proposed development at this site. Whilst any exact mitigation requirements would be determined by the outcome of these surveys, a proposed scheme could be designed to mitigate impacts and provide ecological enhancements at a local level. It is, therefore, anticipated that a development could be planned for this site that would be compliant with current local and national planning policy.

Conclusions

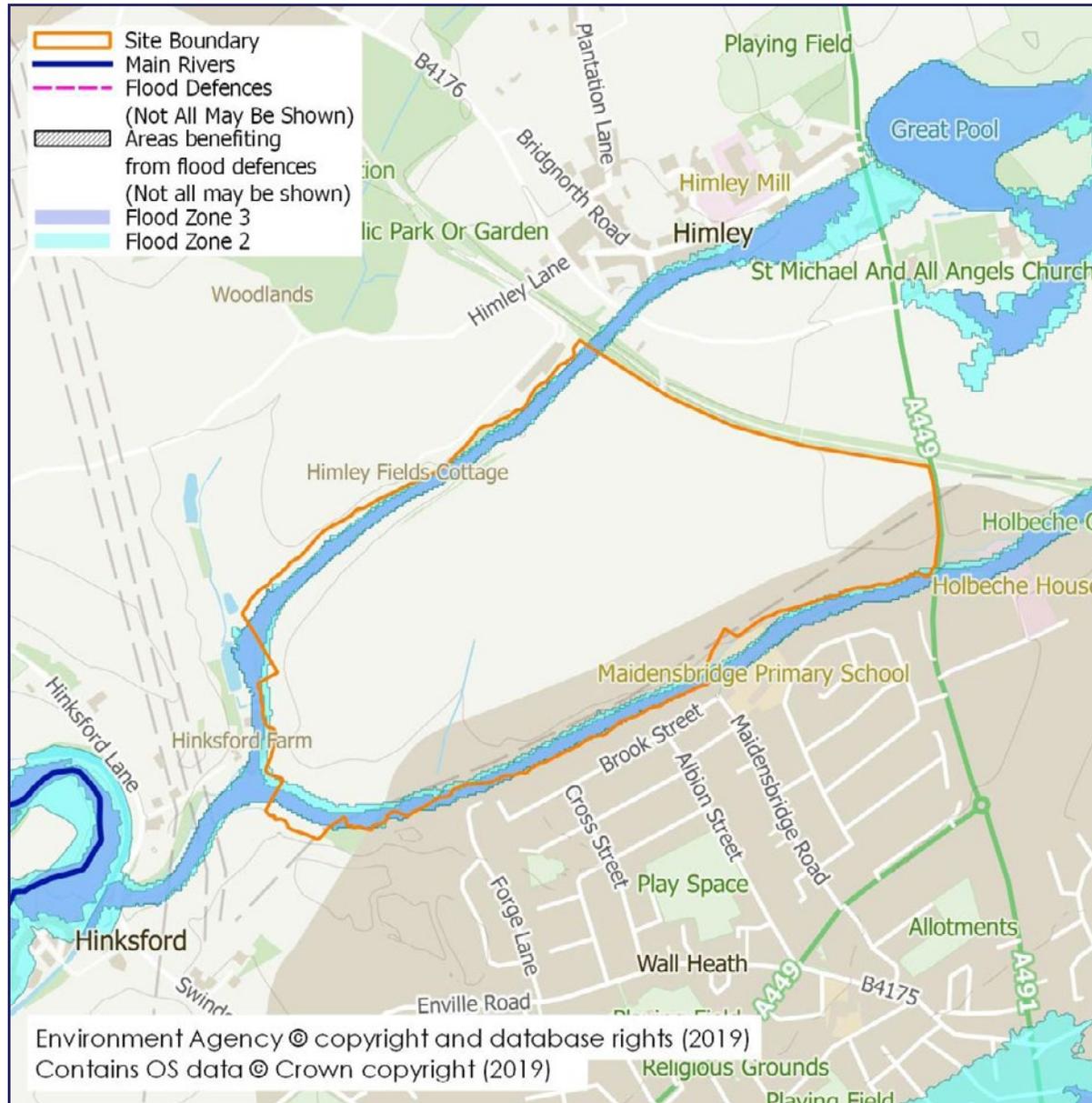
Any development scheme proposed in the future is not anticipated to have a significant impact on any site designated for its nature conservation interest, either at international, national or local level. The proposed scheme could be designed to mitigate impacts to protected species and habitats and provide ecological enhancements at a local level. It is, therefore, anticipated that a masterplan could be brought forward for this site that would be compliant with current local and national biodiversity planning policy.

FLOOD RISK AND DRAINAGE

A Flood Risk and Drainage Technical Note (TN) was created to provide a high-level review of readily available desktop information relating to flood risk and drainage for a proposed employment development at Wall Heath.

- › Environment Agency mapping indicates that the site is located predominantly within Flood Zone 1. There are two unnamed ordinary watercourses which run along the northern, western and southern site boundaries. There are Flood Zones 2 (Medium Probability) and 3 (High Probability) associated with these minor watercourses which extend into the peripheries of the site only. The vast majority of the site is elevated and not at flood risk. The Smestow Brook is an EA Main River which flows in a south-easterly direction approximately 260m from the southern site boundary and is elevated circa 5m lower than the site.
- › Other sources of flood risk; pluvial, reservoir, groundwater and sewer flooding have been assessed and are considered to pose a low flood risk to the site.
- › The site is sloping and undulating in nature. Open source EA DTM LiDAR height data indicates that there is a fall across the site from approximately 82.0m AOD in the northeast to 62.5m AOD along the southern site boundary. It is considered that a strategic earthworks exercise will be required as part of the proposals to establish the formation levels for the development plateaus and highlight areas that are not developable, this will in-turn help to inform the drainage from a levels perspective when this is carried out at a later stage in the consultation process.
- › The site is indicated to be underlain by a permeable bedrock geology and there is the potential for runoff to infiltrate into the ground particularly within the upper layer of superficial deposits across the central portion of the site. However, infiltration potential within the bedrock geology is indicated to be less favourable within the Wildmoor Sandstone Member. A high-level review of surface water drainage has been undertaken assuming that infiltration is not viable. Site specific testing will need to be undertaken in-line with the latest guidance to confirm if there is potential use for Soakaways at the site and as the site is underlain by a Principal Aquifer. Site Investigations will be required to determine potential Groundwater levels and associated flood risk.
- › It is considered a gravity connection could be established to the nearby watercourses to intercept the proposed surface water flows from the development. The LLFA would expect discharge from the site to be restricted to the equivalent greenfield rate where practicable although ensuring that a minimum rate is met to avoid risk of blockage scenario. Surface water storage will be required and in consideration of national guidance and classification of use, this would need to be afforded up to the 1 in 100yr plus 20% climate change event. Outline calculations have been undertaken and indicative basin locations and rates have been shown on the constraints mapping provided.

PLAN 11 ENVIRONMENT AGENCY FLOOD MAP FOR PLANNING (FIGURE 2.1)



- > It is recommended that other SuDS features are incorporated into the masterplan, in addition to the main storage features and as part of a Drainage Strategy, to provide multiple levels to the treatment train and control surface water runoff as close to source as possible. These could include, but are not limited to, oil separators and channel drains for service yard areas, gravel trenches and permeable paving within the site access and landscaping as well as additional above ground treatment in the form of linear swale features or bio-retention areas.
- > Utilities plans obtained from Western Power Distribution and Cadent Gas indicate that there are both overhead power lines and high-pressure gas mains crossing the site. These will require suitable standoff in accordance with the appropriate regulatory bodies and will inform both the final layout of the masterplan and the location of above ground attenuation features. Suitable safety precautions should be in-place before any works take place on-site.
- > Given the greenfield nature of the existing site, a new foul connection to the public sewer network will be required. Based upon the LiDAR and the distance to the nearest available public foul sewer it is likely that a pumped solution will be necessary. There is known to be a sewerage treatment works approximately 30m to the north of the site just north of the Staffordshire Railway Walk, however further details will be required to understand if a foul connection is viable. It is understood due to the scale of the development that sewer modelling will be required to ensure the proposed development can be accommodated, which may result in the requirement for downstream improvement to the sewer network in order to make a connection viable.

PLAN 12 FLOODING AND DRAINAGE CONSTRAINTS PLAN



SECTION 5 CONCEPT MASTERPLAN

The Concept Masterplan has been informed by the initial high-level review of baseline conditions and sets out the broad design principles and parameters to guide future development at the site.

Development Proposals

- › Deliver in the region of approximately 84,844 m² of employment floorspace providing an appropriate mix of B1, B2 and B8 employment uses.
- › Integrated access and movement strategy facilitating new accesses into the site and through it, and linking in to the existing highway network.
- › Establishment of new comprehensive footway and cycleways, including the creation of greenways through the development.
- › Retain, reinstate and enhance internal boundary hedgerows.
- › Retain trees and implement new planting where possible.
- › Provision of an area of accessible public open space to the north, forming a strategic gap between the site and the village of Himley.
- › Link the proposed employment site at Wall Heath to a potential future residential development site to the south of Himley.
- › Maximise connectivity between site and existing residential communities to the north and south.
- › To provide a substantial green buffer around the site which would protect the amenity of local residents in addition to wildlife habitats.
- › Protecting existing wildlife habitats on site and providing a net gain in biodiversity.
- › Enhancing access to the village of Himley and a potential future residential development.
- › Delivery of comprehensive sustainable urban drainage scheme incorporating attenuation features to accommodate surface water runoff and discharges into existing watercourse at greenfield runoff rates.

PLAN 13 CONCEPT MASTERPLAN



bhb
architects

3533 - Wall Heath, Staffordshire
Drawing SK03
Indicative Site Plan
Scale 1:2500 @ A1
07 / 11 / 2019

APPROXIMATE AREA SCHEDULE - NOVEMBER 2019

UNIT	TYPE	GROSS OFFICES GIA		NIA OFFICES APPROX		GROSS W'HOUSE GIA		BUILDING TOTAL GIA		LEVELS	1 PER 1250FT	1 per 30m2 Offices
		m ²	ft ²	m ²	ft ²	m ²	ft ²	m ²	ft ²			
A1	Offices	2,787	30,000	2,230	24,000	0	0	2,787	30,000	3		93
A2	Offices	1,858	20,000	1,486	16,000	0	0	1,858	20,000	3		62
A3	Offices	1,858	20,000	1,486	16,000	0	0	1,858	20,000	3		62
A4	Offices	836	9,000	669	7,200	0	0	836	9,000	2		28
A5	Offices	836	9,000	669	7,200	0	0	836	9,000	2		28
A6	Offices	975	10,500	780	8,400	0	0	975	10,500	2		33
A7	Offices	1,115	12,000	892	9,600	0	0	1,115	12,000	2		37
A8	Offices	836	9,000	669	7,200	0	0	836	9,000	2		28
A9	Offices	836	9,000	669	7,200	0	0	836	9,000	2		28
A10	Offices	1,115	12,000	892	9,600	0	0	1,115	12,000	2		37
B1	Warehouse	232	2,500	0	0	4,413	47,500	4,645	50,000	2	40	
B2	Warehouse	186	2,000	0	0	3,530	38,000	3,716	40,000	2	32	
B3	Warehouse	139	1,500	0	0	2,648	28,500	2,787	30,000	2	24	
B4	Warehouse	186	2,000	0	0	3,530	38,000	3,716	40,000	2	32	
B5	Warehouse	279	3,000	0	0	5,295	57,000	5,574	60,000	2	48	
B6	Warehouse	139	1,500	0	0	2,648	28,500	2,787	30,000	2	24	
B7	Warehouse	244	2,625	0	0	4,634	49,875	4,877	52,500	2	42	
B8	Warehouse	441	4,750			8,385	90,250	8,826	95,000	2	76	
B9	Warehouse	186	2,000			3,530	38,000	3,716	40,000	2	32	
B10	Warehouse	139	1,500			2,648	28,500	2,787	30,000	2	24	
B11	Warehouse	139	1,500			2,648	28,500	2,787	30,000	2	24	
B12	Warehouse	279	3,000			5,295	57,000	5,574	60,000	2	48	
B13	Warehouse	279	3,000			5,295	57,000	5,574	60,000	2	48	
B14	Warehouse	546	5,875			10,370	111,625	10,916	117,500	2	94	
B15	Warehouse	175	1,888			3,332	35,863	3,507	37,750	2	30	
Total		16,642.4	179,137.5	10,442.3	112,400.0	68,201.3	734,112.5	84,844	913,250.0		618	435

Gross Development Total Ft² = **913,250.0**
 Gross Development Total M² = **84,843.8**

Note schedule relates to drawing SK03

SECTION 6 CONCLUSIONS

This Vision Document has been prepared on behalf of CWC Group to support the promotion of land at Wall Heath for a new strategic employment site extending to approximately 84,844 m² of employment floorspace providing an appropriate mix of B1, B2 and B8 employment uses with new public open space and landscaping. The site is located within the administrative area of South Staffordshire District although physically it is related to the built-up edge of Wall Heath, Dudley, within the Black Country, which lies immediately to the south of the site.

The need for the development stems from the inability of neighbouring authorities, such as the Black Country to be able to meet in full its own employment land needs within its own administrative area. In order to accommodate the level of growth associated with the most likely scenario, the EDNA recommends that the review should plan for up to 800 ha of additional land to meet the needs of the Black Country for the period 2014-36 within the B1, B2, B8 use classes and other ancillary uses normally located within employment areas. South Staffordshire has a close functional relationship with the Black Country and is well placed to accommodate their unmet employment requirement through the duty to co-operate.

South Staffordshire Council is currently reviewing its Development Plan in order to identify additional housing and employment sites to meet its own growth requirements, that were not available at the time that the Plan was adopted. As part of the review, the Council are also looking at how it could also meet the wider unmet housing needs of the Black Country. To facilitate the review, the Council are considering amendments to the Green Belt in the District in order to release land for housing and employment.

The land at Wall Heath is, therefore, being promoted at this time to ostensibly contribute to meeting the unmet employment needs arising in the Black Country, albeit that the site is in South Staffordshire. The location of the site on the edge of the built-up edge of Dudley, within the Black Country makes it wholly suited to meeting Black Country's needs by directing new employment land to where it is needed.

Whilst this Vision Document has been created primarily for the promotion of land at Wall Heath as a strategic employment site, it is also CWC Group's intention to promote their land interests to the south of Himley for residential development. The land in CWC Group's control is highlighted as a 'Potential Future Housing Development' on the masterplan and could form a well contained extension to the village of Himley that could assist in meeting the housing requirement of South Staffordshire and the Greater Birmingham and Black Country Housing Market Area.

To assist the promotion of the site, initial high-level assessments of baseline conditions have been undertaken which indicate that there are no technical, physical or environmental constraints that would prevent the development of the site. These assessments have also helped identify opportunities and constraints to guide the masterplanning of the site and to inform evolving transportation, landscaping, biodiversity and drainage strategies for the site.

The site will deliver a significant amount of employment floorspace over a number of years that will make an important contribution to meeting the employment needs of the HEMA. Whilst this is a significant benefit that weighs in favour of the site, a number of other benefits will also be delivered through its development including the provision of new public open space and pedestrian routes. Similarly, a development of this size and scale will deliver a number of economic benefits in terms of the development itself, in addition to construction jobs.

The proposed development will, therefore, make a significant contribution to the delivery of sustainable development. CWC Group are committed to its ongoing promotion and welcome the opportunity to continue engaging in a meaningful manner with the respective Council's through the preparation of their Local Plans.

VISION DOCUMENT PREPARED BY

harrislamb
PROPERTY CONSULTANCY

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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