

SOUTH STAFFORDSHIRE LOCAL PLAN PREFERRED OPTIONS NOVEMBER 2021

LAND OFF LANGLEY ROAD, WOLVERHAMPTON

**REPRESENTATION PREPARED ON BEHALF OF
RICHBOROUGH ESTATES**



**TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012**



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APPENDICES:

Appendix 1: Illustrative Masterplan

1.0 Introduction

1.1 This representation is made by Pegasus Group on behalf of Richborough Estates to the South Staffordshire Local Plan Review ('LPR') Preferred Options Consultation ('the Consultation'). The consultation is progressed under 'Regulation 18' of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 This representation relates to land off Langley Road, Wolverhampton, which Richborough Estates is promoting for residential-led development.

1.3 These representations respond to the following documents, including addressing the questions set out within the LPR Consultation Document:

- Sustainability Appraisal of the South Staffordshire Local Plan Review – Preferred Options Plan, Regulation 18 (III) SA Report, August 2021
- Infrastructure Delivery Plan (South Staffordshire District Council) 2021
- South Staffordshire Green Belt Study – Stage 1 and 2 Report (LUC), July 2019
- South Staffordshire Landscape Sensitivity Assessment (LUC) 2019
- Rural Services and Facilities Audit (South Staffordshire Council) 2021
- Preferred Options Housing Site Selection Topic Paper (South Staffordshire Council) 2021
- Viability Assessment – Local Plan and Community Infrastructure

Levy (Dixon Searle Partnership) October 2021.

1.4 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), 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.

1.5 The representations also give consideration to the legal and procedural requirements associated with the plan-making process.

2.0 What Does the Local Plan Need to Consider?

- 2.1 Richborough Estates supports South Staffordshire District Council ('SSDC') in progressing with a 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 SSDC to comprehensively review the adopted Development Plan, including not only its own objectively assessed housing need, but also the role of the District in meeting unmet cross boundary needs from the wider Greater Birmingham Housing Market Area ('GBHMA'), including from the Black Country.

National Requirements for Plan-Making

- 2.2 Paragraph 33 of the National Planning Policy Framework 2021 ('NPPF') requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years.
- 2.3 Paragraph 24 of the NPPF also 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 can include housing, employment, infrastructure and the Green Belt.
- 2.4 Richborough Estates supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists with the District to guide growth to 2038 and to ensure that development is genuinely plan-led.

Evidence Base

- 2.5 Appendix A of the LPR Consultation Document sets out the range of studies which will be, or have been prepared, to evidence and justify the policies and allocations contained within the LPR.

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to.

- 2.6 Generally, the documents listed in Appendix A are considered to represent comprehensive evidence base necessary to support a local plan. It is also noted that a number of the documents have been updated in 2021, which is also supported.
- 2.7 However, concern is raised that the *Greater Birmingham HMA Strategic Growth Study*, *SSDC's Self Build & Custom Build Register* and the *Strategic Housing & Employment Land Availability Assessment ('SHELAA')* are not included, although it is noted that an updated SHELAA (2021) is available on SSDC's website. It is therefore assumed that its omission from Appendix A is a typographical error.
- 2.8 Nevertheless, the GBHMA Strategic Growth Study is a key aspect of the LPR evidence base and is a crucial piece of evidence in the context of South Staffordshire District.
- 2.9 The GBHMA Strategic Growth Study remains the latest comprehensive consideration of housing needs across the Greater Birmingham and Black Country HMA and provides a range of recommended options for meeting these needs, to be tested through individual LPA Local Plan reviews. This evidence has been subject to scrutiny as supporting evidence at the North Warwickshire Local Plan examination and provides justification for SSDC's intended contribution of 4,000 homes to assist in meeting the identified housing shortfall, as set out in draft Policy DS3.
- 2.10 Similarly, it is considered the Self Build & Custom Build Register should be identified as part of the evidence base to inform emerging policies in respect of housing needs and mix, including the level of self-build and custom-build housing that is expected to be provided on applications for residential

development.

2.11 Whilst the consultation document raises specific questions in relation to some evidence base documents, such as the Infrastructure Delivery Plan ('IDP'), it fails to ask questions in respect of others. Comment on these specific evidence base documents is accordingly contained within the following Chapters of this Representation.

Evidence Base Document	Comment within Representation
Sustainability Appraisal of the South Staffordshire Local Plan Review – Preferred Options Plan, Regulation 18 (III) SA Report, August 2021	Chapter 6
South Staffordshire Green Belt Study – Stage 1 and 2 Report (LUC), July 2019	Chapter 7
South Staffordshire Landscape Sensitivity Assessment (LUC) 2019	Chapter 7
Rural Services and Facilities Audit (South Staffordshire Council) 2021	Chapter 7
Viability Assessment – Local Plan and Community Infrastructure Levy (Dixon Searle Partnership) October 2021.	Chapter 5

Infrastructure Delivery Plan

2.12 An IDP (2021) has been prepared to support the LPR to ensure the required infrastructure and investment needed to deliver the plan effectively is identified. The IDP should include the specific infrastructure projects needed to deliver planned growth and will be updated as the plan progresses

Question 2:

(a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP?

Yes/No

(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?

Yes/No

2.13 Richborough Estates supports SSDC's proposed infrastructure-led strategy

which seeks to focus development towards larger settlements supplemented with some smaller settlement sites and, where appropriate, deliver new infrastructure benefits.

2.14 Development of Land off Langley Road, Wolverhampton, can facilitate significant infrastructure provision, including the following infrastructure opportunities identified within the IDP:

- Improvements to sports and leisure facilities within the District.
- Opportunities to develop new primary education facilities
- Enhancements to the Green Infrastructure Network, including the provision of new publicly accessible open space and measures to ensure achievement of biodiversity net gain.
- Obligations towards health provision

2.15 Overall, it is considered that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP. Richborough Estates is committed to engaging with SSDC, the Parish Council and service providers to explore infrastructure requirements to inform future iterations of the Infrastructure Delivery Plan and the emerging proposal for Land off Langley Road.

Vision and Strategic Objectives

2.16 The LPR Consultation Document identifies a number of 'Issues and Challenges' surrounding homes and communities, economic vibrancy 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.

Question 3:

a) Have the correct vision and strategic objectives been identified?

Yes/No

b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No

- 2.17 Whilst the Vision is succinct, it is not considered to be locally relevant and contains no spatially specific elements. It also seeks to 'protect and enhance' the District as it currently exists, rather than thinking forward and considering how the growth proposed within the LPR can better the District as a whole.
- 2.18 The strategic objectives identified are also broadly supported, particularly the recognition of the requirement to make a proportionate contribution towards the unmet needs of GBHMA contained within Objective 2.
- 2.19 Overall, it is considered that the draft emerging policies will assist in delivering these objectives.

3.0 Development Strategy

Green Belt and Open Countryside

Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside? Yes/No If no, please explain how these policies should be amended?

- 3.1 Policy DS1 is broadly in line with the relevant paragraphs of the NPPF relating to development within the Green Belt and is therefore supported.
- 3.2 The recognition within the supporting text that exceptional circumstances exist for Green Belt release within the District to allow for sustainable development within the plan period is also supported. However, this recognition should also be included within Policy DS1, with cross reference made to the relevant sites where Green Belt release is proposed.
- 3.3 Richborough Estates has no comment to make in respect of Policy DS2.

Housing

- 3.4 Richborough Estates supports the recognition at Paragraph 4.6 of the LPR that:

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

Spatial Strategy to 2038

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? Yes/No If no, please explain how this policy should be amended?

- 3.5 Policy DS3 sets out that SSDC will deliver a minimum of 8,881 dwellings, comprising 4,131 dwellings to meet South Staffordshire’s own housing need using the Government’s standard method across the 17-year plan period 2021-2038, 750 dwellings which have already been completed in the District in the period 2018-2021 and a further 4,000 dwellings to contribute towards the unmet needs of the GBHMA.
- 3.6 The Policy also defines a settlement hierarchy across five 'tiers', across which the housing target will be distributed.
- 3.7 In respect of residential development, Richborough Estates broadly supports the policy approach of Policy DS3. However, it remains a concern that the 8,881 dwellings proposed through the LPR may be insufficient, as set out below. In addition, it is submitted that the Spatial Housing Delivery Table (Table 8), should be woven into the Policy, as the settlement hierarchy currently doesn't consider locations adjacent to the Black Country Urban Area, such as Land at Langley Road, as sustainable locations for growth.

Housing Requirement for South Staffordshire District

- 3.8 This is based upon the Government's Standard Method for Calculating Housing Need, which currently requires the district to deliver a minimum annual average of 243 dwellings per annum ('dpa'), based upon a baseline figure of 195 dpa and the 2020 affordability ratio of 7.88 (released March 2021)¹.
- 3.9 Nonetheless, Planning Practice Guidance ('PPG') is clear that the figure

¹ Whilst the Strategic Housing Market Assessment ('SHMA') identifies a minimum housing requirement of 254 dpa, it is acknowledged that this is based upon the 2018 affordability ratio of 7.39 and is therefore out of date.

produced by the Standard Method represents a minimum figure, rather than a requirement².

3.10 PPG provides a non-exhaustive list of examples whereby additional growth beyond the minimum requirement may be appropriate, including relevant growth strategies for the area, strategic infrastructure improvements or accommodating unmet need from neighbouring authorities³.

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

3.12 These circumstances are considered in further detail below.

Unmet Housing Needs from the Wider Housing Market Area

3.13 The recognition of the significant housing shortfall arising from Birmingham City and the Black Country at paragraphs 4.8-4.9 of the Consultation Document is supported.

3.14 The 37,900-home shortfall arising from within Birmingham has been tested and confirmed at examination, whilst the Black Country Authorities have produced the Draft Black Country Plan 2018-2039, which has been subject to consultation in 2021, and which concluded that the amount of housing need which cannot be accommodated in the Black Country amounts to around 28,239 homes to 2039.

3.15 It is important to stress that these shortfall figures do not take into consideration the 35% uplift applied to Birmingham introduced in December 2020, as the adopted Birmingham Development Plan pre-dated this. The overall unmet housing need figure arising from the GBBCHMA is therefore well in excess of 66,000 homes.

² Paragraph: 002 Reference ID: 2a-002-20190220

³ Paragraph: 010 Reference ID: 2a-010-20201216

3.16 The LPR Consultation Document sets out that, in order to contribute towards meeting this shortfall, SSDC will "test" for the delivery of an additional contribution of 4,000 dwellings through the LPR, based on the scale of growth implied in the district by the strategic locations identified in the GBHMA Strategic Growth Study⁴ ('SGS').

3.17 The principle of this contribution is supported by Richborough Estates, although SSDC should continue to co-operate with other authorities within the GBBCHMA to ensure that the level of the contribution made by each Authority is sufficient to collectively meet the significant shortfall discussed above.

Economic Uplift

3.18 The SHMA sets out the broad economic consequences of the projected growth in Chapter 5. However, the SHMA fails to consider the impact of committed development at the West Midlands Interchange ('WMI'), which is projected to create around 8,500 new jobs, well in excess of the increased in the working age population between 2018 and 2038 identified by the SHMA (3,489 people).

3.19 In addition, significant jobs growth will be provided through committed strategic employment developments planned at i54 and ROF Featherstone.

3.20 At present, the SHMA fails to consider whether the minimum local housing need figure derived from the standard method (243 dpa equating to 4,131 dwellings) would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth, even taking into consideration the 4,000 additional homes to meet unmet needs in the wider GBHMA.

3.21 Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand.

⁴ Greater Birmingham HMA Strategic Growth Study (GL Hearn) 2018

This may require an uplift in local housing needs identified.

Spatial Strategy

- 3.22 SSDC previously consulted on a Spatial Housing Strategy and Infrastructure Delivery (SHSID) document in October 2019. This looked at how the proposed housing target could be distributed between different settlements and other broad locations within the District.
- 3.23 Richborough Estates does not support the limiting of new allocations at Perton to only the land safeguarded through the adopted SAD. Further comment on this matter is provided within a further Representation relevant to Perton, prepared by Pegasus Group on behalf of Richborough Estates.
- 3.24 Furthermore, whilst Featherstone is identified as a Tier 3 Settlement within the Settlement Hierarchy, it is located less than a mile away from the strategic mixed-use allocation at Cross Green (ref:646a and 646b). It is submitted that Featherstone can play a similar role in supporting the existing and planned employment opportunities in the area, whilst also supporting the creation of additional services and facilities, to the betterment of the overall sustainability of the settlement. Further comment on this matter is provided within a further Representation relevant to Featherstone, prepared by Pegasus Group on behalf of Richborough Estates.

Longer Term Growth Aspirations for a New Settlement

- 3.25 Policy DS4 sets out an aspiration for SSDC to deliver a new settlement beyond the plan period. A broad location comprising the transport corridor formed by the A449 and West Coast Mainline between Wolverhampton and Stafford has been identified as a potential area of search for such proposals.

Question 6: Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement? Yes/No If no, please explain how this policy should be amended?

-
- 3.26 Richborough Estates supports Policy DS4 and recognises the importance and suitability of the identified potential growth corridor, as first suggested by the SGS. Richborough Estates also supports the objectives for the new settlement as set out within the Policy.
- 3.27 To this end, Richborough Estates is promoting Land North of the A5, Gailey, which falls within this corridor. A separate representation has been prepared by Pegasus Group on behalf of Richborough Estates which further promotes this land for allocation in a future Local Plan.

4.0 Site Allocations

Strategic Masterplanning Locations

- 4.1 Richborough Estates has a number of land interests within South Staffordshire District. This Representation relates to Land off Langley Road, Wolverhampton and should be read in conjunction with other representations submitted on behalf of Richborough Estates.

Question 7:

a) Do you support the proposed strategic housing allocations in policies SA1-SA4? Yes/No If no, please explain your reasons for this.

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code? Yes/No

- 4.2 Richborough Estates has no specific comments to make in respect of the Strategic Allocations SA1-SA4.

Housing Allocations

Question 8: Do you support the proposed housing allocations in Policy SA5? Yes/No Please reference the site reference number (e.g site 582) for the site you are commenting on in your response.

- 4.3 Richborough Estates supports the allocation of their land interests identified through Policy SA5 – Land adjacent to 44 Station Road, Codsall (ref:224), Land off Marston Road/ Fenton House Lane (ref: 610), and Land North of Langley Road (adjoining City of Wolverhampton boundary) (ref: 582).

5.0 Development Management Policies

5.1 Chapter 6 of the LPR sets out a number of preferred approaches to policies against which planning applications will be determined. At this stage, these preferred approaches do not reflect the final policy wording that will be included in the Local Plan Review that will be submitted to the Secretary of State. Instead, they are intended to highlight key requirements, aims and measures that the final submitted policies will deliver, focusing on the most important parts of the future policies to seek views on these.

Question 11: Do you agree with the proposed policy approaches set out in Chapter 6? Yes/No. If no, then please provide details setting out what changes are needed, referencing the Policy Reference number (e.g HC1 - Housing Mix).

Policy HC1 – Housing Mix

5.2 Whilst it is recognised that the Policy contained within the LPR Consultation Document is not a 'final' version of the intended Policy, it is nevertheless submitted that the final wording should be flexibly worded to allow for appropriate application across the differing settlements and locations across the District, as appropriate.

5.3 At present, the Policy requires 'major development' to provide:

- 75% of market homes to have 3 bedrooms or less, with specific breakdown to be determined with reference to latest Housing Market Assessment; and
- Specific breakdown of affordable housing to be determined with reference to latest Housing Market Assessment and other affordable housing needs evidence

- 5.4 This wording is not sufficiently clear or flexible. It is not clear whether applications will be expected to strictly accord with the evidence presented in the SHMA, or simply have 'reference' to that evidence.
- 5.5 Much can change over the 17 years of the Plan. It is submitted that it is most appropriate for housing mix to be guided by market signals as reflected in the most up-to-date assessment of needs. Such assessments will need to be updated over the course of the Plan period. The requirement that 75% of properties comprise of three-bedrooms or less is restrictive and does not afford the flexibility required for the reasons set out above.
- 5.6 The policy should also comment that it is subject to viability assessment, thus allowing for flexibility in its application.
- 5.7 Lastly, 'Major development' is defined by footnote 11 of the LPR which states that:

"Major residential development is defined in the 2019 National Planning Policy Framework as "development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more" [NB this definition is carried through to the 2021 version of the NPPF].

- 5.8 Whilst a definition of major development is contained within the NPPF, the statutory definition is actually contained within the Town and Country Planning Development Management Procedure Order, which defines major development as where:

(Ci) the number of dwellinghouses to be provided is 10 or more; or

*(Cii) the development is to be carried out on a site having an area of 0.5 hectares or more **and it is not known whether the development falls within sub-paragraph (c)(i)** [Pegasus Emphasis].*

- 5.9 The text emphasised above is an important qualifier when considering whether or not a proposal constitutes major development. This qualifying text has not been carried through into the definition contained within the NPPF. It is submitted that the definition in the DMPO should be referred to within the LPR for the avoidance of doubt.

Policy HC2 – Housing Density

- 5.10 Policy HC2 currently sets out an aim to achieve a minimum net density of 35 dwellings per net developable hectare in developments "*within or adjoining Tier 1 settlements, in infill locations within the development boundaries of other settlements in the district or in urban extensions to neighbouring towns and cities*".
- 5.11 The objective of achieving an efficient use of land on development sites is supported. However, the policy should be drafted to recognise that a blanket approach to density is unlikely to be effective as this will vary between individual sites depending on specific site constraints and opportunities. Furthermore, it is considered that this wording does not provide direction as to what is expected of developments adjacent to settlements within Tiers 2-5 of the Settlement Hierarchy, which should be corrected.

Policy HC3 – Affordable Housing

- 5.12 Policy HC3 requires proposals for major residential development to provide 30% of all dwellings to be affordable housing, broken down using the following ratio:
- 50% social rent,
 - 25% shared ownership, and
 - 25% first homes
- 5.13 The requirement for 30% affordable housing appears to be broadly supported

by the Viability Study⁵ which confirms that affordable housing within the range of 20-30% is potentially relevant to strategic housing sites overall, assuming a maximum of £9,200/dwelling S106 costs and no additional CIL contributions. However, the LPR and evidence base should justify why social rent is the preferred rented tenure, rather than affordable rent.

5.14 It is recognised that a Stage 2 Viability Assessment will be undertaken once more refined and bespoke assumptions regarding infrastructure and development costs are known. It also is understood that the Infrastructure Delivery Plan will continue to be evolved and refined as the Local Plan review progresses.

5.15 Richborough Estates would welcome the opportunity to engage with the Council and the appointed viability consultants prior to the publication of the Stage 2 Assessment.

5.16 The requirement to ‘peppercot’ affordable housing in clusters across the development is generally supported. However, the policy should recognise that for management purposes, Registered Providers do require a degree of clustering of affordable housing within a development and this will inform site layouts.

5.17 Policy HC3 also suggests it would not support grant funding for homes to be provided under the requirements of the Policy. It is submitted that the funding mechanisms for the delivery of affordable housing is not a planning matter and is therefore beyond the remits of a Policy to control. This text should accordingly be removed.

Policy HC4 – Homes for Older People

5.18 Policy HC4 requires major development to:

⁵ Viability Assessment – Local Plan and Community Infrastructure Levy (Dixon Searle Partnership) October 2021.

"...make a clear contribution to meeting the needs of the district's ageing population, through the provision of either: general needs properties for older people e.g. bungalows, other ground floor accommodation with appropriate age restrictions on occupation; or specialist housing e.g. sheltered, extra care homes.

30% of all market and affordable homes to meet Building Regulations Standard Part M4(2) – Accessible and adaptable dwellings."

5.19 The above policy wording does not define 'older people', so it is unclear as to exactly who this Policy is targeting or who would be eligible to occupy such dwellings.

5.20 It also is also unclear as to the level of bungalows or other ground floor accommodation that development is expected to provide. This should be quantified to ensure less scope for unnecessary discussions between developers and SSDC at a later stage in the application process. It is not clear if this policy intends to continue to SSDC's current approach of requiring 10% of all homes to be delivered as bungalows or other ground floor accommodation. This clarification is particularly important now that affordable compact domestic lifts are increasingly becoming an alternative to ground floor accommodation. New builds can be designed so that these can be fitted to a property when required.

5.21 The policy also sets out that 30% of all market and affordable homes should meet Building Regulations Standard Part M4(2) Accessible and adaptable dwellings. These requirements are optional within Building Regulations and are described as making *"reasonable provision for most people to access the dwelling and incorporate features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users."* It is recognised that the older person population is likely to increase over the plan period, however an ageing population affects the whole country and is not an issue specific to South Staffordshire. If the Government had intended that evidence of an ageing population alone

justified adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case.

- 5.22 Furthermore, the SHMA identifies a need for 1,783 accessible and adaptable general homes for those over 65 years and 1,235 for those under 65 years, across the Plan Period. This equates to less than 30% of the overall housing requirement to be delivered by this Plan (Table 8 of the LPR identifies a supply of 10,034 dwellings). It is therefore not clear how the 30% requirement within the Policy has been arrived at or how this is justified. The requirement to provide a proportion of dwellings to meet Part M4(2) may be justified but it would not be appropriate to include both this requirement and a requirement to provide bungalows or other ground floor accommodation.

Policy HC7 – Self & Custom Build Housing

- 5.23 Policy HC7 requires sites for major residential development to "*...have regard to any need identified on the self-build and custom housebuilding register, with provision to be agreed on a site-by-site basis.*"
- 5.24 The imposition of a District-wide percentage requirement would not be supported, as it would likely result in the over-provision of self-build and custom-build housing within the District. Whilst Richborough generally support the concept of self-build/custom housing, they do not consider providing them as part of a larger housing development is the most appropriate solution because self/custom builders are more likely to want a more bespoke location/setting. Smaller dedicated self/custom sites are therefore a more appropriate answer.
- 5.25 However, if there is a policy requiring self/custom build on major sites then it is nevertheless submitted that it should include a mechanism to allow for such plots to come forward for market housing if demand is subsequently found to be absent. For example, if serviced plots for self-build and custom housebuilding have been made available and marketed for a set period of

time and have not sold, plots can be used for delivery of general market housing.

Policy HC9 – Design Requirements

- 5.26 Richborough Estates supports the introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance.
- 5.27 However, the requirement to provide tree lined streets should only be in instances where the locations are agreed by the highway authority. Local highway authorities often do not want trees in immediate proximity of the street due to management concerns or liabilities.
- 5.28 The utilisation of design codes is supported, but only where they are commensurate with the scale of development proposed. In general, it is expected that they be limited to strategic level sites.

Policy HC11 – Space about dwellings and internal space standards

- 5.29 The continuity of existing external space and dwellings standards is generally supported although there should be a recognition that certain housetypes, for example Part M4(2) dwellings, should have smaller, more manageable gardens.
- 5.30 The requirement that all dwellings should meet Nationally Described Space Standards is not supported without being fully evidenced. National Planning Guidance Housing: optional technical standards (paragraph 020) clearly states that *"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- *Need – evidence should be provided in the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *Timing – there may need to be a reasonable transition period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”*

5.1 It is clear that the introduction of the NDSS requires a Local Plan policy which has been fully evidenced, justified and viability tested. The Strategic Housing Market Assessment (SHMA) makes reference to the NDSS (paragraph 7.35) only in the context of assessing the need for accessible and adaptable homes. The SHMA does not provide any justification or evidence for requiring NDSS in the District.

5.2 If NDSS is subsequently justified and pursued, the policy should be sufficiently flexible to recognise that well-designed housetypes which fall slightly below will be acceptable, particularly on sites where the majority of the dwellings comply. The policy should also make provision for additional flexibility in relation to affordable housing as many registered providers have their own requirements.

Policy HC12 – Parking Standards

5.3 The continuity of existing parking standards is supported. The inclusion of EV charging standards is also supported and provides helpful clarity.

Policy HC14 - Health Infrastructure

- 5.4 The policy objective of ensuring development does not result in an unacceptable impact on health infrastructure is supported. It is suggested that SSDC should engage with the CCG now regarding proposed allocations to refine the approach to infrastructure contributions and include this as part of the IDP. Any infrastructure contributions will be required to meet the CIL tests. This approach ensures that all likely costs associated with the proposed allocations are known, thus allowing for an informed view as to their viability.

Policy HC15 – Education

- 5.5 The policy approach is generally supported although, again, it is suggested that SSDC should engage with SCC Education and include relevant infrastructure requirements as part of the IDP, to ensure that all costs associated with allocations are known.

Policy HC17 – Open Space

- 5.6 The policy requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site, for example where there is already high-quality equipped play provision in the locality it would not make sense to duplicate this provision. In addition, it is not appropriate to require open space to be centrally located on all sites. The policy should take a more flexible approach to achieve the right design solution for each site.
- 5.7 In addition, the exclusion of small incidental green infrastructure (GI) without a clear recreational purpose from on-site open space provision is not supported. The policy text cites landscape buffers as an example of incidental GI which may be excluded. This is not appropriate as landscape buffers can be of a significant size and clearly make a contribution towards open space provision on a site. They should therefore be included in these calculations.

- 5.8 Clarification should also be provided as to whether features such as attenuation basins are considered to be 'incidental'.

Policy HC18 – Sports Facilities and Playing Pitches

- 5.9 Policy HC18 requires major developments to determine required provision through use of the latest Playing Pitch Calculator and Sports Facilities Calculator provided by Sport England, informed by the recommendations of both the Indoor Sports Facilities Strategy 2020 and the Playing Pitch Strategy 2020. Further guidance on the procedure for determining provision required from new development will be set out in an Open Space, Sport and Recreation SPD.
- 5.10 This policy is noted, although it is submitted that it would be more appropriate for SSDC to define standards expected from development as part of policy (as per the open space standard defined by Policy HC17, for example). This approach provides greater certainty in respect of the infrastructure delivery requirements expected from sites, which ultimately impacts upon their viability. The level of provision expected, and the associated viability implications should be considered within both the IDP and viability assessment.

Policy EC3 – Inclusive Growth

- 5.11 The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential dwellings is not supported. Whilst the benefits of such plans are acknowledged, it is considered more appropriate to implement them on a site-by-site basis, dependent on local circumstances and the labour market. This is especially important in the context of modular methods of construction inevitably increasing in the coming years, probably sourced from outside South Staffordshire.

Policy EC9 – Infrastructure

- 5.12 Policy EC9 commits SSDC to work with and support infrastructure providers and also offer policy support for the delivery of infrastructure identified through the IDP. This is broadly supported, although this engagement with relevant providers should also be taking place as part of the Plan process.

Policy EC10 – Developer Contributions

- 5.13 Policy EC10 confirms that specific infrastructure requirements will be identified in relevant policy areas and site proformas.
- 5.14 Whilst this approach is supported, it is paramount that a detailed list of infrastructure requirements is included within the Publication (Regulation 19) version of the Plan, to allow for sufficient scrutiny and comment by the public and interested parties.

Policy NB1 - Protecting, Enhancing and Expanding Natural Assets

- 5.15 Policy NB1 is supported on the whole. However, the final sentence again refers to a requirement to provide tree lined streets. As set out above in respect of Policy HC9, tree lined streets should only be included following detailed engagement with the local highway authority, due to the practicalities of management, maintenance and liability.

Policy NB3 - Cannock Chase SAC

- 5.16 The Local Plan Review notes that a separate suite of joint studies are being updated with adjoining authorities in relation to Cannock Chase SAC. The findings of these studies should influence the policy approach to Cannock Chase SAC and determine appropriate mitigation measures.

Policy NB6 - Energy and Water Efficiency, Energy and Heat

Hierarchies and Renewable Energy in New Development

- 5.17 The aspirations of this policy to reduce carbon emissions is generally supported. The policy should nevertheless confirm the threshold at which developments are expected to submit an energy statement as part of any application for planning permission.
- 5.18 The inclusion of the target to achieve a 31% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L 2013 are noted. It is understood that this requirement is reflective of anticipated changes to building regulations to deliver the Government's 'Future Homes Standard'. These changes mean that, from mid-2022, new homes will have a 31% reduction in CO₂ when compared to current standards. Further changes are due in 2025 that will mean a 75% reduction in CO₂ when compared to today, along with a new focus on rating primary energy efficiency as well as CO₂.

6.0 Sustainability Appraisal

6.1 The LPR Consultation is supported by a Sustainability Appraisal, prepared by Lepus Consulting⁶ ('the SA'). The purpose of the SA is stated as being to appraise the sustainability performance of all potential site allocations for development. The potential sites are assessed in relation to each of the stated objectives in the SA Framework as follows:

- **SA Objective 1. Climate change mitigation:** Minimise the Plan area's contribution to climate change;
- **SA Objective 2. Climate change adaptation:** Plan for the anticipated impacts of climate change;
- **SA Objective 3. Biodiversity and geodiversity:** Protect, enhance and manage the biodiversity and geodiversity assets of the Plan area, including flora and fauna;
- **SA Objective 4. Landscape:** Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening its distinctiveness;
- **SA Objective 5. Pollution and waste:** Ensure sustainable management of waste whilst minimising the extent and impacts of water, air and noise pollution.
- **SA Objective 6. Natural resources:** Protect, enhance and ensure the efficient use of the Plan area's land, soils and water;
- **SA Objective 7. Housing:** Provide a range of housing to meet the needs of the community;
- **SA Objective 8. Health:** Safeguard and improve physical and mental health of residents;
- **SA Objective 9. Cultural heritage:** Conserve, enhance and manage sites, features and areas of historic and cultural importance;
- **SA Objective 10. Transport and accessibility:** Improve choice and efficiency of sustainable transport in the Plan area and reduce the need to travel;
- **SA Objective 11. Education:** Improve education, skills and

⁶ Sustainability Appraisal of the South Staffordshire Local Plan Review – Preferred Options Plan, Regulation 18 (III) SA Report, August 2021

qualifications in the Plan area; and

- **SA Objective 12. Economy and employment:** Support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.

6.2 The SA also appraises the draft development management policies and their likely outcomes.

6.3 The significance of effects is scored as follows:

Significance	Definition (Not Necessarily Exhaustive)
Major Negative --	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	The size, nature and location of development proposals would be likely to: <ul style="list-style-type: none"> • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse
Minor Positive +	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key

	elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.
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Table 6.1: Guide to scoring significance of effects

6.4 The SA represents an update to previous iterations of the SA which have supported previous consultation versions of the LPR.

Land off Langley Road, Wolverhampton – Site Ref: 582

6.5 Land off Langley Road is assessed within the SA as 'Land off Langley Road' under site reference: 582. This includes an assessment of the nature and magnitude of the impact of the development, both pre- and post-mitigation. These assessments are reproduced in Figures 6.1 and 6.2 below.

Site Reference	1 Climate Change Mitigation	2 Climate Change Adaptation	3 Biodiversity & Geodiversity	4 Landscape & Townscape	5 Pollution & Waste	6 Natural Resources	7 Housing	8 Health & Wellbeing	9 Cultural Heritage	10 Transport & Accessibility	11 Education	12 Economy & Employment
582	+/-	--	+/-	--	-	-	+	-	-	-	++	-

Figure 6.1: Significance of effects pre-mitigation, Site Ref: 582

Site Reference	1 Climate Change Mitigation	2 Climate Change Adaptation	3 Biodiversity & Geodiversity	4 Landscape & Townscape	5 Pollution & Waste	6 Natural Resources	7 Housing	8 Health & Wellbeing	9 Cultural Heritage	10 Transport & Accessibility	11 Education	12 Economy & Employment
582	+/-	+	+/-	--	-	-	+	-	0	-	++	-

Figure 6.2: Significance of effects post-mitigation, Site Ref: 582

- 6.6 Richborough Estates supports the above scoring overall but disputes the finding that developing the Site would result in a Major Negative impact upon landscape and townscape.
- 6.7 The SA sets out that site is considered to result in a 'high' level harm to the Green Belt, as concluded by the Green Belt Study which supports the LPR⁷.
- 6.8 In respect of other aspects, the site was only found to have 'moderate' landscape sensitivity or a 'minor negative' impact on landscape character, views from the public right of way network, views for local residents, urbanisation of the countryside and coalescence).
- 6.9 The finding that the site would have a Major Negative impact upon landscape and townscape accordingly appears to be based upon the finding that the site would result in a 'high' level of harm to the Green Belt.
- 6.10 The Green Belt Study shows Land off Langley Road, Wolverhampton, as falling within Green Belt Sub-Parcel reference: Sub-Parcel Ref S59B – '*Spring Hill [and adjacent land]*', which is identified as making the following contribution to the five purposes of the Green Belt:

GB Purpose	Assessment	Rating
P1: Checking the unrestricted sprawl of large built-up areas	Land is adjacent or close to the large built-up area, contains no or very limited urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside.	Strong
P2: Preventing the merging of neighbouring towns	Land plays no significant role due to the distance between the West Midlands conurbation and Bridgnorth, its nearest neighbouring town.	Weak / No contribution
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	Strong

⁷ South Staffordshire Green Belt Study – Stage 1 and 2 Report (LUC), July 2019

P4: Preserve the setting and special character of historic towns	Land does not contribute to the setting or special character of a historic town	Weak / No contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong

Table 6.2: Sub-Parcel Ref S59B – ‘Spring Hill [and adjacent land] Green Belt Scoring

6.11 As set out further in Chapter 7 of this Representation, whilst the conclusions of the above assessment are noted, it remains that Green Belt Sub-Parcel ref: S59B extends significantly beyond Land off Langley Road, which itself serves a reduced function against the five purposes of the Green Belt, as set out below (and detailed further in Chapter 7 of this Representation).

GB Purpose	Previous Rating	Revised Rating
P1: Checking the unrestricted sprawl of large built-up areas	Strong	Moderate
P2: Preventing the merging of neighbouring towns	Weak / No contribution	Weak / No contribution
P3: Safeguarding the countryside from encroachment	Strong	Moderate
P4: Preserve the setting and special character of historic towns	Weak / No contribution	Weak / No contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	Strong	Moderate

Table 6.3: Land off Langley Road Green Belt Scoring

6.12 Overall, it is considered that these reconsidered assessments would result in a revised Green Belt harm finding of 'moderate' which, in turn, would result in a reduced SA impact score of Minor Negative ('-') for the site in respect of Landscape and Townscape.

7.0 Land off Langley Road, Wolverhampton

7.1 This Chapter sets out a brief description of the site, followed by an assessment of the site against each of the Council's site selection criteria, as defined within the Site Selection Methodology for Preferred Options document (Appendix 6 of Spatial Housing Strategy & Infrastructure Delivery consultation).

Site Description

7.2 Richborough Estates has current land interests in land off Langley Road, Wolverhampton. The site adjoins the western edge of the Black Country conurbation to the north of Langley Road. The Staffordshire Railway Walk lies to the north, with existing residential properties located beyond. Existing residential properties also lie to the east and south of the site, whilst an electricity distribution substation and agricultural fields are located to the west. The site extends to approximately 19 hectares and comprises a number of fields within agricultural use and land associated with a derelict plant nursery.

7.3 The site is located within Flood Zone 1 (the area at least risk from flooding). The site is generally flat with the lowest point located within the southern element of the site.

7.4 The site is currently accessed from Langley Road to the south, via the access associated with the former plant nursery. A separate access also exists for purposes of maintaining the substation.

Proposed Development

7.5 An Illustrative Masterplan is included at **Appendix 1** to this representation, which demonstrates how the site is capable of accommodating up to approximately 400 new dwellings, as well as associated public open space,

drainage, play areas and landscaping.

- 7.6 The layout also depicts how the site can accommodate land to facilitate the expansion of Bhylls Acre Primary School.

Green Belt

- 7.7 South Staffordshire District Council has commissioned a Green Belt Assessment, alongside the City of Wolverhampton, Dudley, Sandwell and Walsall, (together comprising the Black Country authorities). The Study forms an important piece of evidence for the partial review of the Black Country Core Strategy (the Black Country Plan) and the strategic site allocations and individual development plans of the Black Country Authorities, as well as South Staffordshire District.

- 7.8 The Green Belt Study has two stages; the first is to assess 'strategic variations' between the contribution of land to the five purposes of the Green Belt, whilst the second includes a more focused assessment of the potential 'harm' of removing land from the Green Belt. Alongside the Green Belt Study, a Stage 3 assessment involved undertaking a landscape sensitivity assessment in order to assess the sensitivity of land within the South Staffordshire to housing and employment development. Whilst there is a relationship between landscape sensitivity and Green Belt contribution/harm in that physical elements which play a role in determining landscape character, there are fundamental distinctions in the purposes of the two assessments. As such, the findings of the Stage 3 landscape sensitivity assessment for South Staffordshire and the Black Country are presented in a separate document (Landscape Study 2019) and is considered later in this representation.

Green Belt Purposes

- 7.9 The National Planning Policy Framework (NPPF) states that the Green Belt should serve the five following purposes:

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

Land off Langley Road; Contributions to Green Belt Purposes

7.10 The Green Belt Study shows Land off Langley Road, Wolverhampton, as falling within Green Belt Sub-Parcel reference: Sub-Parcel Ref S59B – *'Spring Hill [and adjacent land]'*, which is identified as making the following contribution to the five purposes of the Green Belt:

GB Purpose	Assessment	Rating
P1: Checking the unrestricted sprawl of large built-up areas	Land is adjacent or close to the large built-up area, contains no or very limited urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside.	Strong
P2: Preventing the merging of neighbouring towns	Land plays no significant role due to the distance between the West Midlands conurbation and Bridgnorth, its nearest neighbouring town.	Weak / No contribution
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	Strong
P4: Preserve the setting and special character of historic towns	Land does not contribute to the setting or special character of a historic town	Weak / No contribution

P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong
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Table 7.1: Land Parcel S59B Contribution Towards Green Belt Purposes

7.11 The Study goes on to identify differing levels of harm if land within the parcel was to be released from the Green Belt for development. Should any ‘uncontained’ land within the parcel be released for development, the resulting harm would be ‘high’, stating:

"The sub-parcel makes a strong contribution to checking the sprawl of the West Midlands conurbation and to preventing encroachment of the countryside. The sub-parcel largely comprises open farmland and directly adjoins the settlement of Wolverhampton to the east. The expansion of Wolverhampton into the sub-parcel would increase urban influence upon surrounding Green Belt land and would not create a stronger Green Belt boundary than the existing boundary of the inset area. As such, release of this land would constitute a limited weakening of the Green Belt. Release of this sub-parcel would contain Green Belt land to the east within the City of Wolverhampton District, so there would be no justification in retaining its Green Belt status, but this would not increase the level of harm to Green Belt purposes."

7.12 In respect of ‘land north of housing on Langley Road’, the resulting harm would be ‘moderate-high’, stating:

"The sub-parcel makes a strong contribution to checking the sprawl of the West Midlands conurbation and to preventing encroachment of the countryside. This part of the sub-parcel is tightly contained by outcrops of the settlement of

Wolverhampton. Release of this land would therefore have a negligible effect on the Green Belt."

Harm Ratings Overview Map of Land within Sub-Parcel

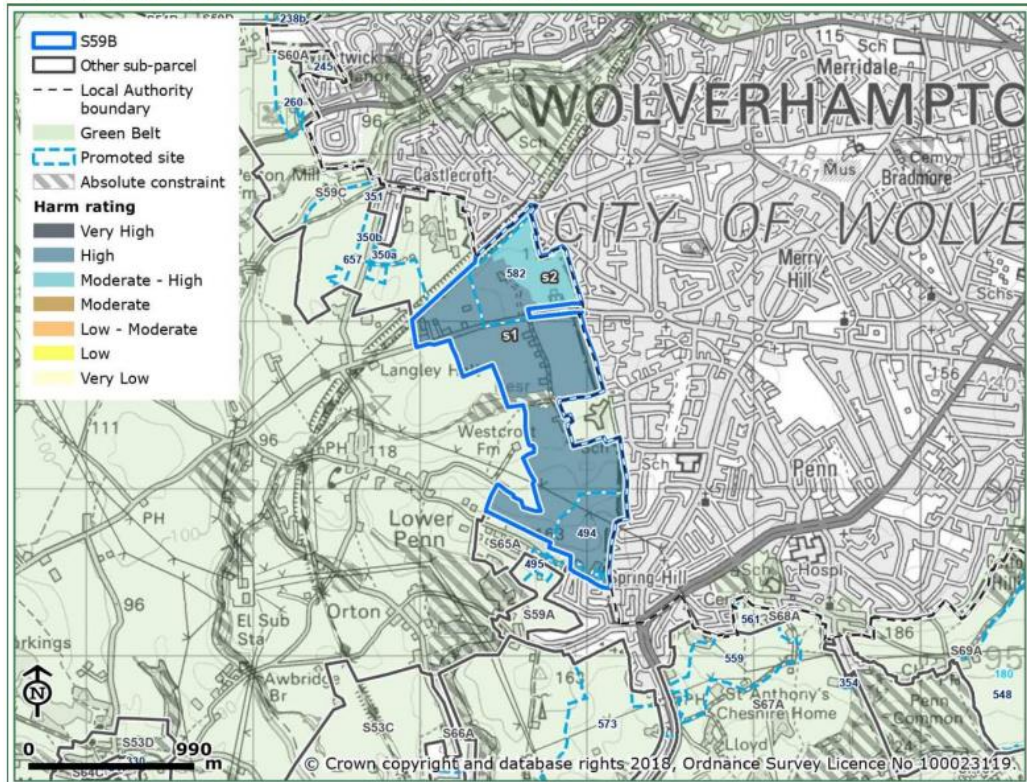


Figure 7.1: Harm Ratings for Land Parcel S59B

7.13 Whilst the conclusions of the above assessment are noted, it remains that Green Belt Sub-Parcel ref: S59B extends significantly beyond Land off Langley Road, which itself serves a reduced function against the five purposes of the Green Belt, as assessed below.

To Check the Unrestricted Sprawl of Large Built-Up Areas

7.14 The site relates well to the edge of the built form of the West Midlands conurbation, being enveloped by existing built features on three of four sides. Specifically, the site is bounded by the South Staffordshire Railway walk to the north, beyond which lies residential development. Bhylls Acre Primary School and further residential properties lie to the east, whilst residential properties also lie to the south of the site on Langley Road.

- 7.15 An existing electricity substation is also sited immediately adjacent to a section of the site's western boundary, representation an urbanising feature beyond the currently settlement edge.
- 7.16 Furthermore, the site's western boundary is comprised of intermittent mature trees and hedgerow, which could be strengthened in order to provide an enduring future Green Belt Boundary, level with the surrounding settlement edge to the north and south. The release of the site for development would serve to consolidate and 'round-off' the settlement edge in this location.
- 7.17 It is therefore felt that the site makes a 'moderate' contribution to checking the unrestricted sprawl of large built-up areas, rather than the 'strong' contribution identified within the Green Belt Study.

To Prevent Neighbouring Towns from Merging into One Another

- 7.18 The site plays no significant role in preventing neighbouring towns from merging into one another, due to the distance between the site and Bridgnorth, its nearest neighbouring town. The site therefore makes a 'weak/no' contribution to preventing neighbouring towns from merging into one another. Richborough Estates accordingly agrees with the conclusions of the Green Belt Study in this regard.

To Assist in Safeguarding the Countryside from Encroachment

- 7.19 Whilst the Site itself site contains some characteristics of open countryside, such as an absence of built development, it remains that the site is surrounded by existing built form on three of its four sides, with the addition of the electricity substation partly forming the fourth site boundary. The site is accordingly strongly influenced by existing urbanising features.
- 7.20 Furthermore, the site has durable defensible boundaries that are afforded clear physical enclosure from the wider Green Belt. The development of the site would present the opportunity to further strengthen these boundaries,

thus safeguarding the countryside from future encroachment.

- 7.21 It is therefore considered that the site makes a 'moderate' contribution to assisting in safeguarding the countryside from encroachment, rather than the 'strong' contribution identified within the Green Belt Study.

To Preserve the Setting and Special Character of Historic Towns

- 7.22 Richborough Estates agrees with the conclusions of the Green Belt Study, that the site makes a 'weak/no' contribution to preserving the setting and special character of historic towns.

To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and other Urban Land

- 7.23 Whilst it is acknowledged that all Green Belt land makes a contribution towards encouraging the recycling of derelict and other urban land, the site and immediate area does not contain significant areas of brownfield land and would therefore not prejudice the redevelopment of urban land in this area. As such, the release of the site from the Green Belt and allocation for residential development would not significantly prevent the recycling of derelict land and other urban land.

- 7.24 It is therefore considered that the site makes a 'moderate' contribution to this purpose of the Green Belt, rather than the 'strong' contribution identified within the Green Belt Study.

Summary of Green Belt Purposes

- 7.25 Overall, it is therefore considered that Land off Langley Road, Wolverhampton, makes a reduced contribution to the five purposes of the Green Belt than that identified within the Green Belt for Green Belt Sub-Parcel ref: S59B. This contribution is summarised in the table overleaf:

GB Purpose	Previous Rating	Revised Rating
P1: Checking the unrestricted sprawl of large built-up areas	Strong	Moderate
P2: Preventing the merging of neighbouring towns	Weak / No contribution	Weak / No contribution
P3: Safeguarding the countryside from encroachment	Strong	Moderate
P4: Preserve the setting and special character of historic towns	Weak / No contribution	Weak / No contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	Strong	Moderate

Table 7.2: Land off Langley Road, Green Belt Assessment

Green Belt Harm

- 7.26 Given the reduced impact upon the five purposes of the Green Belt set out above, is contented that the Green Belt harm identified within the Study should be reduced from 'moderate-high' to 'low-moderate'.
- 7.27 It is the view of Richborough Estates that the site makes a moderate contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. The release of the site for development would provide the opportunity to strengthen the Green Belt boundary in this location, as well as rounding off the existing settlement edge. The site would form a logical location for the expansion of the settlement edge, and new Green Belt boundaries could be readily drawn and strengthened without compromising the functions of the designation.
- 7.28 Therefore, release of this site would constitute a limited weakening of the Green Belt.
- 7.29 Given the reduced impact upon the five purposes of the Green Belt, it is contented that the Green Belt harm identified within the Study should be reduced from 'high' to 'low-moderate'.

7.30 It is the view of Richborough Estates that the site makes a moderate contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. The release of the site for development would provide the opportunity to strengthen the Green Belt boundary in this location, as well as rounding off the existing settlement edge. The site would form a logical location for the expansion of the settlement edge, and new Green Belt boundaries could be readily drawn and strengthened without compromising the functions of the designation.

7.31 Therefore, release of this site would constitute a limited weakening of the Green Belt.

Landscape Sensitivity

7.32 South Staffordshire District Council has produced a Landscape Study (2019) which forms part of the Local Plan Review evidence base. Land off Langley Road falls within Landscape Parcel Reference: SL28, which falls within the 'Settled Farmlands' Landscape Character Type. The landscape area follows the western settlement edge of the outskirts of Wolverhampton from near Penn Fields School to the A454. The area includes parts of the River Stour, the Staffordshire and Worcestershire Canal and the disused railway line which is now a recreational route.

7.33 An extract of the Council's Appraisal of Landscape Sensitivity is included below:

Characteristic / Attribute	Lower Sensitivity to Development	Moderate Sensitivity to Development	Higher Sensitivity to Development
Scale		Fields are a mixture of small and medium scale, many with intact hedgerows and hedgerow trees which contribute to the human scale. Some fields have been subdivided by post and	

		wire and tape for horse paddocks. There are also a number of sports pitches.	
Landform	There is little topographical variety in the proposed area with elevation ranging from 90m near the River Stour to a high point of 125m AOD in the east.		
Landscape pattern and time depth		There has been relatively little change in field pattern since the late 19th century and fields are likely to be of post-medieval origin (piecemeal enclosure) except for areas in the north near A454 where fields enclosed in the 18th/19th centuries are smaller and irregular.	
'Natural' character		Limited areas of semi-natural habitat include priority habitat deciduous woodland along the disused railway line which is designated as a local nature reserve (LNR) South Staffordshire Railway Walk and woodland around Castlecroft House. Valued natural features include mature hedgerow trees, including oaks.	
Built character	Few heritage assets or historic features important to landscape character. Built character is mostly modern with properties along Drivefields Road and Langley Road. The presence of an	Local heritage features include the Wolverhampton to Kingswinford Railway and the Staffordshire and Worcestershire Canal.	

	electricity sub-station and sports grounds with associated infrastructure negatively influences landscape character.		
Recreational character		Recreational opportunities include public footpath routes and trafficfree cycle routes along the canal towpath and the railway walk.	
Perceptual aspects		The area has a sense of rural character and tranquillity, although this is impacted by signs of human activity and modern development, such as the overhead power line and larger scale development (tower blocks and a school) on the edge of Wolverhampton.	
Settlement setting		The area provides a rural backdrop to the surrounding settlements, including the village of Lower Penn and the extensive suburban fringe of Wolverhampton.	
Visual prominence	The area is not visually prominent within the wider landscape as it has limited topographical variation.		
Inter-visibility with adjacent designated landscapes or promoted view points	Little or no inter-visibility with adjacent sensitive landscapes or marked viewpoints.		
Landscape Sensitivity Judgement	Based on the combination of landscape attributes outlined above, the area is judged to have an overall moderate sensitivity to residential development.		Moderate

7.34 The Study concludes that Landscape Parcel SL28 (which encompasses the

Land off Langley Road) is considered to have a 'moderate' overall sensitivity to residential development, as identified on Figure 8.1 below.

Landscape Sensitivity Rating

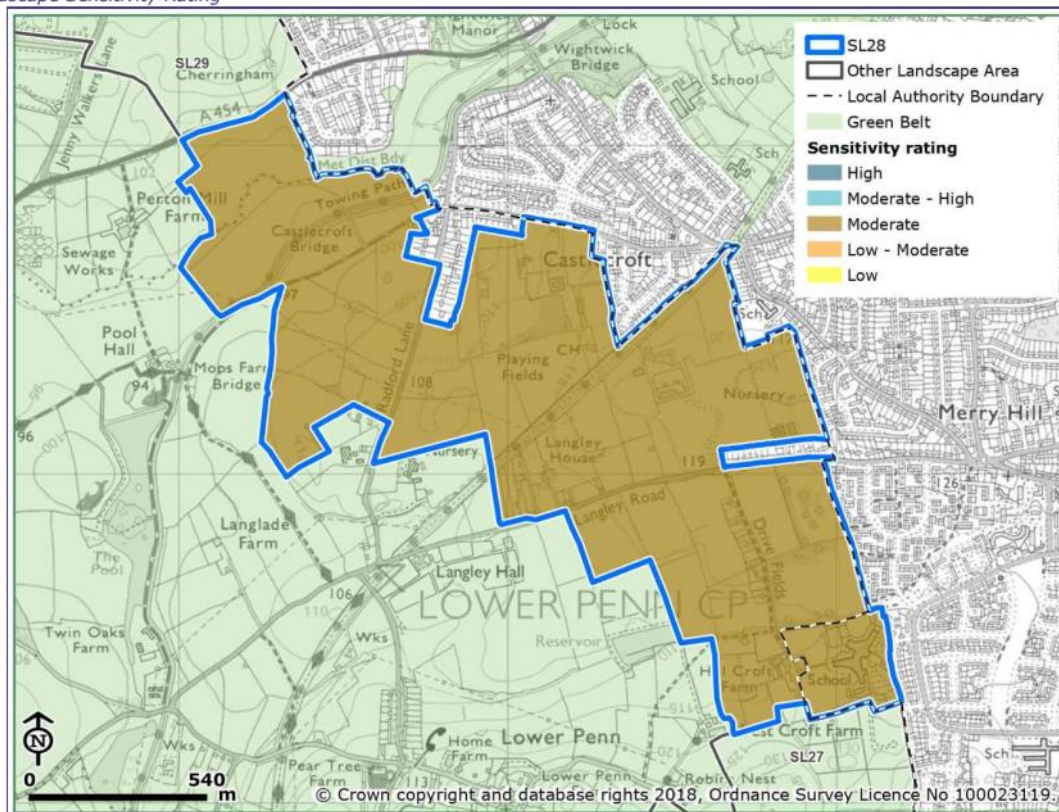


Figure 7.3: Landscape Sensitivity Rating Parcels SL28

7.35 The findings of the Landscape Study are not necessarily disputed by Richborough Estates. However, given that the site is recessed within the existing urban edge of the West Midlands conurbation, it is considered that the site performs better in landscape terms than the wider landscape parcel.

7.36 Any development that takes place on the site would be focused towards the eastern edge, adjacent to the existing built form of the West Midlands conurbation. Reduced densities and open space would be located to the western edge of the site, providing a transition between built form and the countryside.

7.37 The development of the site also represents an opportunity to strengthen the

existing boundary to its western edge. This would provide an improved landscape buffer and restrict views of the site from the wider countryside.

Sustainability

7.38 South Staffordshire District Council has prepared a Rural Services and Facilities Audit (2021) ('the RSFA') which presents evidence on the relative level of services and facilities present in settlements within South Staffordshire.

7.39 The RSFA identifies five key indicators to compare the relative sustainability of settlements within the District as follows:

- Access to food stores;
- Diversity of accessible community facilities/services;
- Access to employment locations;
- Access to education facilities; and
- Public transport access to higher order services outside of the village.

7.40 Land off Langley Road is located immediately adjacent to the settlement edge of Wolverhampton and, as such, is not associated with any stand-alone settlement located within South Staffordshire.

7.41 Nevertheless, the site benefits from good access to the suburbs of Merry Hill, Castlecroft and Upper Penn, which provide a good range of shops, including supermarkets, community facilities and health care facilities. In addition, the area includes a number of primary and secondary schools and good access to public transport.

- 7.42 Land off Langley Road also benefits from good access into Wolverhampton and Pendeford Business Park, with the Number 4 bus service providing regular travel between Codsall, I54, Wolverhampton and Spring Hill. Wolverhampton represents the major urban centre adjacent to South Staffordshire, with the site therefore benefits from good opportunities for access to both retail, leisure and employment destinations.
- 7.43 The site benefits from good access to the suburbs of Merry Hill, Castlecroft and Upper Penn, which provide a good range of shops, including supermarkets, community facilities and health care facilities. In addition, the area includes a number of primary and secondary schools and good access to public transport.
- 7.44 Land off Langley Road also benefits from good access into Wolverhampton and Pendeford Business Park, with the Number 4 bus service providing regular travel between Codsall, I54, Wolverhampton and Spring Hill. Wolverhampton represents the major urban centre adjacent to South Staffordshire, with the site therefore benefits from good opportunities for access to both retail, leisure and employment destinations.
- 7.45 The site is therefore sustainably located.

Impact on the Historic Environment

- 7.46 There are no statutory designated heritage assets within the immediate vicinity of the site.
- 7.47 The nearest heritage assets to the site comprise a Grade II Listed building known as 'The Buttery', located on Castlecroft Gardens, as well as Castlecroft Gardens Conservation Area. These assets are located approximately 350m from the north-eastern site boundary, with existing built form located in the intervening distance.
- 7.48 Given the distance between the site and these assets, it is considered likely

that the development of the site will not affect the significance of these designated heritage assets, nor their settings. A detailed heritage and archaeological assessment would support any planning application.

Highways (Accessibility to the Site)

- 7.49 The site is sustainably located, and a range of local retail, leisure and employment facilities are accessible by modes other than the private car.
- 7.50 Vehicular site access can be provided via new point of access to Langley Road, in accordance with relevant local and national design guidance, ensuring there would be no material impact on highway safety or highway capacity as a result.

Impact upon the Natural Environment

- 7.51 The South Staffordshire Railway Walk located to the northern site boundary is designated as a Local Nature Reserve. Any development of the site would accordingly be required to take this into consideration, including incorporating any necessary development offsets to minimise impacts upon wildlife.
- 7.52 No other Local Nature Reserve, SSSI or other land-based designations exist in the vicinity of the site.

Suitability

- 7.53 The information set out above demonstrates that Land off Langley Road is a suitable site for development.

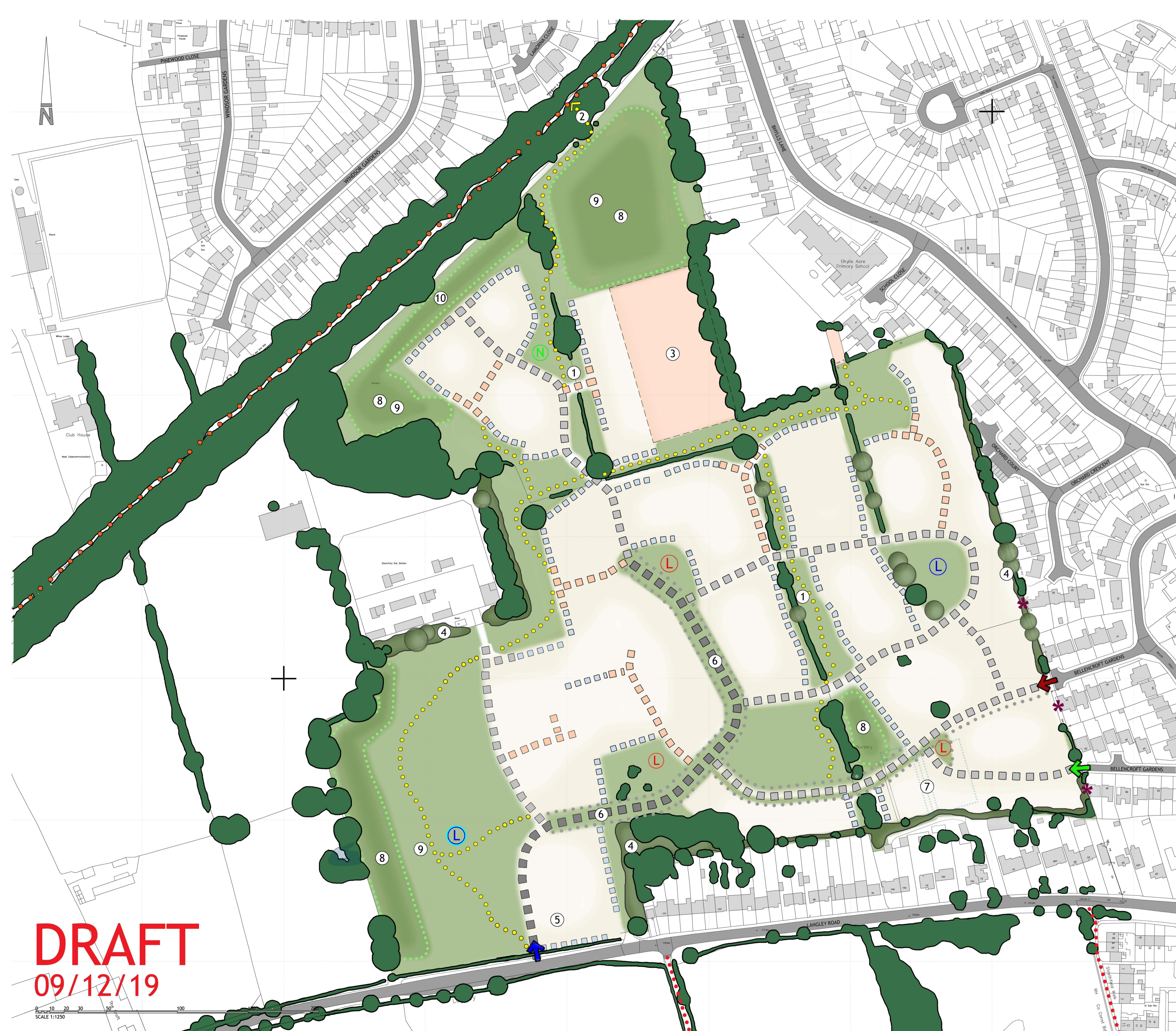
Deliverability

- 7.54 There is an agreement in place between the landowner and Richborough Estates to facilitate the development of the site.
- 7.55 There are no constraints likely to render the site undeliverable in the Plan period. The site is available now.
- 7.56 There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the impacts of the development of the site can be mitigated and, in many cases, a positive outcome can be achieved.
- 7.57 The site is deliverable and immediately available and, subject to allocation, could deliver homes and associated community benefits within the next 5 years.

8.0 Conclusion

- 8.1 This representation is made by Pegasus Group on behalf of Richborough Estates Limited to the South Staffordshire Local Plan Review, Preferred Options (Regulation 18) consultation. This representation relates to land off Langley Road, Wolverhampton, which Richborough Estates is promoting for residential development.
- 8.2 Richborough Estates is supportive of the Local Plan Review overall, including the decision to include Land off Langley Road, Wolverhampton, as an allocation.
- 8.3 The information contained within this representation, read in conjunction with the appended illustrative masterplan, demonstrates that land off Langley Road is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 8.4 There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the potential impacts of the development of the site can be mitigated through design and in many cases a positive outcome can be achieved.

APPENDIX 1



NOTES

- Contractors must check all dimensions on site. Only figured dimensions are to be worked from. Discrepancies must be reported to the Architect or Engineer before proceeding. © This drawing is copyright.
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KEY

- ① Green corridor links incorporating existing trees and hedges
 - ② Possible connection to South Staffordshire Railway Walk
 - ③ Potential school expansion site
 - ④ Existing landscape to be retained and enhanced where necessary
 - ⑤ Continuation of existing residential street
 - ⑥ Principal residential street
 - ⑦ Line of existing derelict nursery buildings to be demolished
 - ⑧ Proposed surface water attenuation areas
 - ⑨ Opportunities for habitat enhancement
 - ⑩ Protection buffer to designated nature conservation site
-
- Ⓛ Proposed 'Local Area for Play' (LAP)
 - Ⓛ Proposed 'Local Equipped Area for Play' (LEAP)
 - Ⓛ Proposed Enhanced LEAP
 - Ⓝ Proposed Natural Play Area
-
- Existing South Staffordshire Railway Walk
 - Existing Public Footpaths
 - ➡ Proposed site entrance off Langley Road
 - ➡ Proposed emergency access from Bellencroft Gardens
 - ➡ Potential emergency access from Bellencroft Gardens
 - ▬ Proposed primary residential access road
 - ▬ Proposed secondary residential access road
 - ▬ Proposed shared surfaces
 - ▬ Proposed private driveways
 - Proposed black-top footpath
 - Proposed informal pathways through open space
 - ✳ Layout to respond to any existing habitable room windows' outlook

Illustrative Net Developable Area = 9.45 Ha (23.35 Acres)
Illustrative Open Space Area = 5.72 Ha (14.13 Acres)

REV	DESCRIPTION	DRN	CHD	DATE
PRELIMINARY	INFORMATION			TENDER
CONSTRUCTION	AS BUILT			

SCALE 1:1250 @ A1 DATE Dec 2019

DRAWN CM CHK GS

DRAWING NO. 18418/ 1004 REV -

TITLE **Langley Road**
Wolverhampton

DETAILS **Concept Layout**

Woods Hardwick
 Architecture | Engineering | Planning | Surveying

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DRAFT
09/12/19

SCALE 1:1250