	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<p><b>Ref:</b></p>  <p><b>(For official use only)</b></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)

<p>Title <input style="width: 90%;" type="text"/></p> <p>First Name <input style="width: 90%;" type="text"/></p> <p>Last Name <input style="width: 90%;" type="text"/></p> <p>Job Title (where relevant) <input style="width: 90%;" type="text"/></p> <p>Organisation (where relevant) <input style="width: 90%;" type="text" value="Lichfields c/o St Philips Land Limited"/></p> <p>Address Line 1 <input style="width: 90%;" type="text"/></p> <p>Line 2 <input style="width: 90%;" type="text"/></p> <p>Line 3 <input style="width: 90%;" type="text"/></p> <p>Line 4 <input style="width: 90%;" type="text"/></p> <p>Post Code <input style="width: 90%;" type="text"/></p> <p>Telephone Number <input style="width: 90%;" type="text"/></p> <p>E-mail Address (where relevant) <input style="width: 90%;" type="text"/></p>	<p><input style="width: 90%;" type="text" value="Mr"/></p> <p><input style="width: 90%;" type="text" value="Myles"/></p> <p><input style="width: 90%;" type="text" value="Wild-Smith"/></p> <p><input style="width: 90%;" type="text" value="Associate Director"/></p> <p><input style="width: 90%;" type="text" value="Lichfields"/></p> <p><input style="width: 90%;" type="text" value="Cornerblock"/></p> <p><input style="width: 90%;" type="text" value="2 Cornwall Street"/></p> <p><input style="width: 90%;" type="text" value="Birmingham"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text" value="B3 2DX"/></p> <p><input style="width: 90%;" type="text" value="0121 713 1530"/></p> <p><input style="width: 90%;" type="text" value="myles.wild-smith@lichfields.uk"/></p>
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Please see refer to Section 2 of our detailed representations.

(Continue on a separate sheet /expand box if necessary)

**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**, 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:

Our representations have raised matters relating to the soundness of the Publication Plan. St Philips Land Limited wish to appear at the Examination to respond to any matters raised and clarifications required by the Inspector.

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**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**

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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  Policy  Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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.

Please refer to Section 2 of our detailed representations.

(Continue on a separate sheet /expand box if necessary)

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.



Please refer to Section 2 of our detailed representations.

(Continue on a separate sheet /expand box if necessary)

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**South Staffordshire Publication  
Plan (Pre-Submission) 2024**  
**Representations on behalf of  
Land off Orton Lane,  
Wombourne**

**Land at Wombourne**

St Philips Land Limited

29 May 2024

**LICHFIELDS**

# **Lichfields is the pre-eminent planning and development consultancy in the UK**

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# Appendices

Appendix 1 Vision Document



## 1.0 Introduction

- 1.1 These representations to the South Staffordshire Publication Plan (“the PP 2024”) consultation have been prepared by Lichfields on behalf of land off Orton Lane, Wombourne.
- 1.2 We focus on the strategic matters which are contained within the PP 2024 consultation document and relate specifically to St Philips’ land interests at land off Orton Lane, Wombourne, Staffordshire (“site 416a”). Site 416a was previously allocated within the Publication Plan (Regulation 19) 2022 [“PP 2022”], however has been deallocated within the PP 2024.
- 1.3 St Philips seeks to work constructively with South Staffordshire Council (“the Council”) as it progresses towards the adoption of the Local Plan Review and trusts that the comments contained within this document will assist Officers in this regard.

## Plan-making to Date

- 1.4 To date, the Council has consulted on an ‘Issues and Options Consultation’ (“IOC”) between 8 October and 30 November 2018, followed by the South Staffordshire Spatial Housing Strategy & Infrastructure Delivery (“the SHSID”) and the Infrastructure Delivery Plan 2019 [IDP] between 17 October until 12 December 2019.
- 1.5 The IOC did not define the Council’s preferred approach, but rather considered a range of five potential future spatial strategies to meet the Council’s preferred level of housing growth for the District up to 2037. Consequently, the SHSID sought views on how the Council’s housing target could be best planned for through a variety of Spatial Housing Options to distribute housing growth across the district.
- 1.6 This was followed by the Preferred Options consultation from November to December 2021, which set out an infrastructure-led strategy, and proposed site allocations to meet the district’s (inter alia) housing needs. The Council then proceeded to undertake a consultation on the PP 2022 between November to December 2022. This consultation asked for views on the legal soundness of the Council’s PP 2022 and the policies within it.
- 1.7 The Council is now proceeding with a PP 2024 consultation. The Local Development scheme sets out the reasoning for this, stating:
- “The Council paused work on the emerging Local Plan Review between January and July 2023 while waiting for the outcome of the government changes to the NPPF that were published in December 2022. There is still currently no clear indication of when the government will publish its response to the consultation, the Council has therefore now resumed work on the Plan. This delay had several implications for the Local Plan including the Plan period needing to be extended to 2041 which has required several updates to evidence base documents, and a need to undertake a further Regulation 19 consultation.”* (paragraph 3.4).
- 1.8 The Local Development Scheme sets out the following timescales for the progression of the Local Plan Review:
-

- **Evidence Base compilation** - ongoing notification as elements of the evidence base are produced.
- **Issues and Options Consultation** – November 2018;
- **Preferred Options** – November -December 2021;
- **Spatial Housing Strategy & Infrastructure Delivery Consultation October - December 2019;**
- **Publication (1)** – November – December 2022;
- **Publication (2)** – spring 2024;
- **Submission of Local Plan** – winter 2024/25;
- **Local Plan Examination** – 2025;
- **Adoption of Local Plan** – Winter 2025/26.

## **Structure**

1.9 These representations are structured around the policies set out within the PP 2024 consultation, these being:

- Policy SA3 (Housing Allocations);
- Policy DS5 (The Spatial Strategy to 2041);

## 2.0 Areas of Response

- 2.1 St Philips' response to the PP 2024 is set out below, using the draft policies contained within the PP 2024 document for continuity.

### Policy DS5 (The Spatial Strategy to 2041)

- 2.2 Draft Policy DS5 (The Spatial Strategy to 2041) of the PP 2024 sets out a revised spatial strategy to address the district's housing requirements for the plan period. Paragraph 5.61 of the PP 2024 states that:

*“The spatial strategy and distribution the growth outlined in Policy DS4 is based upon a capacity led approach that focuses the majority of growth on the district's most sustainable settlements, with Green Belt release limited to these Tier 1 settlements.”*

- 2.3 The PP 2022 had previously set out the following spatial strategy for South Staffordshire:

*“The spatial strategy and distribution of growth is based upon an infrastructure led approach. This can mean different things for different locations. For larger strategic sites, this may mean on site delivery of new infrastructure such as a new school or local centre. For smaller villages it may be about smaller scale infrastructure, such as delivering a local play space, or about planning for limited new development that will help sustain existing infrastructure (e.g. local school) over the longer term.”* (Paragraph 5.65).

- 2.4 The revised spatial strategy (as set out within the PP 2024) is identified as 'Option I' within the 'Sustainability Appraisal of the South Staffordshire Local Plan Review (2023-2041)' (March 2024) ["SA 2024"]. The SA states that Option I comprises a limited contribution towards the Greater Birmingham and Black Country Housing Market (GBBCHMA) needs and limited Green Belt development in Tier 1 settlements.

- 2.5 Option I, alongside Option H (Limited Green Belt development only to meet existing critical infrastructure needs), were additional spatial strategy options which were identified by the Council in the context of the publication of the updated NPPF in December 2023. These two options were not appraised alongside spatial strategy options A, B, C, D, E, F and G within the previous Sustainability Appraisal ('Sustainability Appraisal of the South Staffordshire Local Plan Review (October 2022)') ["SA 2022"], which was prepared to inform the PP 2022.

### The Preferred Spatial Strategy

- 2.6 Policy DS5 (The Spatial Strategy to 2041) sets out that a minimum of 4,726 dwellings will be delivered over the plan period and states that growth will be distributed to the district's most sustainable locations. The policy also sets out a settlement hierarchy, with Wombourne identified as a Tier 2 settlement (second in the hierarchy). The PP 2024 states that:

*“These settlements [Tier 2 settlements] hold a wider range of services and facilities than other smaller settlements in the district's rural area. The sustainable growth of these larger rural settlements will be delivered through appropriate allocations made in the Local Plan, consisting of suitable and deliverable non-Green Belt site allocations.”*

---

- 2.7 The PP 2024 spatial strategy does not propose any new allocations at Tier 2, Tier 3, Tier 4 or Tier 5 Villages (PP 2024, Table 8). Instead, the Council is relying upon safeguarded land and existing planning permissions and allocations to deliver growth in these locations. Notwithstanding one allocation made at 'Areas adjacent to neighbouring towns and cities' (South of Stafford at Land at Weeping Cross), new allocations are only made at Tier 1 settlements.
- 2.8 St Philips is concerned that the Council's chosen approach does not support the vitality of lower-tier settlements (Tier 2, 3, 4 and 5 villages) which have the capacity to accommodate growth. In this regard, the 'Housing Site Selection Topic Paper 2024' sets out the following commentary in respect of Wombourne:
- "The Council's preferred Spatial Housing Strategy, as set out in the Council's Local Plan Review – Publication Plan consultation, seeks to locate additional housing growth on non-Green Belt options in Wombourne over the plan period 2023 to 2041, in addition to the existing safeguarded land sites around the village. At a strategic level, this approach recognised the settlements' level of facilities and public transport links compared to other rural settlements in the District, with Wombourne being the District's largest tier 2 settlement. Unlike all other Tier 2 settlements, Wombourne also carries one of the District's three Large Village Centres, reflecting its wider retail offer."*
- 2.9 The above demonstrates that Wombourne is one of the most sustainable locations within the district for housing growth. Despite this, the total proportion of housing growth being directed to Wombourne has fallen from 8% within the PP 2022 to 5.7% within the PP 2024. By focusing new allocations exclusively at Tier 1 settlements, St Philips is concerned that the Council is limiting the ability of Tier 2, 3, 4 and villages to grow and thrive. In this regard, St Philips notes that Paragraph 83 of the NPPF states that:
- "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."*
- 2.10 Additionally, the Council's chosen approach does not sufficiently address local affordability issues. In this regard, Appendix 2 of the 'Spatial Housing Strategy Topic Paper 2024' sets out that Wombourne:
- "... has a worse affordability ratio than the West Midlands averages, meaning that new housing may help to avoid local residents already living within the village from being priced out of the area."*
- 2.11 St Philips also notes that affordability ratios are higher in the Wombourne Area than in the wider district. Wombourne North and Lower Penn, Wombourne South East, and Wombourne South West have affordability ratios of 10.31, 11.57, 10.24 respectively compared to 9.89 for the District (Affordable Housing and Housing Mix Topic Paper, page 3).
- 2.12 By not allocating any new sites within Tier 2, 3, 4 and 5 settlements, other than those on safeguarded land previously identified, St Philips is concerned that the Council will
-

exacerbate existing affordability pressures. It should be noted that Paragraph 82 of the NPPF is clear that:

*“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.”*

## **Spatial Options**

2.13

In the context of the above, St Philips notes that the SA 2024 appraised the following spatial options:

- **Spatial Option A** – Maximise Open Countryside release;
- **Spatial Option B** – Prioritise Green Belt land release in areas of lesser Green Belt harm;
- **Spatial Option C** – Carry forward existing Core Strategy strategic approach to distribution;
- **Spatial Option D** – Maximise sites in areas identified in the Greater Birmingham Housing Market Area (GBHMA) Strategic Growth Study;
- **Spatial Option E** – Address local affordability issues and settlements with the greatest needs;
- **Spatial Option F** – Give first consideration to Green Belt land which is previously developed or well-served by public transport;
- **Spatial Option G** – Infrastructure-led development with a garden village area of search beyond the Plan period;
- **Spatial Option H** – Limited Green Belt development only to meet existing critical infrastructure needs; and
- **Spatial Option I** – Limited contribution towards GBBCHMA needs and limited Green Belt development in Tier 1 settlements.

2.14

Figure 1 (SA 2024, Table 5.7) sets out the performance of the proposed spatial options against the SA objectives:

---

Figure 1 SA Performance of the Spatial Options

Spatial Option	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Option A	--	--	-	--	--	-	++	-	-	-	+	-
Option B	--	--	-	--	--	-	++	-	-	-	++	-
Option C	--	--	-	--	--	-	++	-	-	-	++	+
Option D	--	--	-	--	--	-	++	-	-	+	++	+
Option E	--	--	-	--	--	-	++	-	-	+	++	+
Option F	--	--	-	--	--	-	++	-	-	+	++	+
Option G	--	--	-	--	--	-	++	-	-	+	++	++
Option H	--	--	-	--	--	-	+	-	-	+	++	+
Option I	--	--	-	--	--	-	++	-	-	++	++	+

Source: SA 2024, Table 5.7

2.15 The SA 2024 states that Options A, B and C are the worst-performing options, whilst spatial options D, E, F, G, H and I perform similarly (SA, page 38). Option H is identified within the SA as the best performing option against most SA Objectives (Objectives 1 – climate change mitigation, 5 – pollution and waste, and 11 – education). However, the SA goes on to state that Option I is preferable as it:

*“would seek to positively prepare the Plan, making a contribution towards the unmet requirements of the wider HMA, whilst proposing a significantly lower quantum of growth, and lower potential for adverse environmental effects, than Options A, B, C, D, E, F or G.”* (SA Appendix F, F.11.14.5)

2.16 As set out previously within this report, St Philips is concerned that Option I is limiting the ability of Tier 2, 3, 4 and 5 villages to grow and thrive. It also does not sufficiently address affordability issues within rural areas.

2.17 In this regard, St Philips would like to highlight to the Council that, according to Figure 1, Option G equals the performance of Option I against the SA objectives. Both options are also identified as the best performing option against one of the SA objectives; Option G performs best against SA objective Economy and Employment and Option I performs best against SA Objective Transport and Accessibility. In this context, it is clear that Option G represents a sustainable, alternative spatial strategy to Option I. Option G also enables all village tiers within the settlement hierarchy to benefit from new housing growth.

2.18 To summarise, St Philips is supportive of the Council directing the majority of growth to the most sustainable settlements within the district. However, St Philips is concerned that the Council’s decision to only make new housing allocations at Tier 1 villages will adversely impact the ability of Tier 2, 3, 4 and 5 villages to address affordability issues and the viability and vitality of these settlements. It is therefore St Philips’ belief that the Council should consider an alternative spatial strategy which directs more growth to settlements which are lower in the settlement hierarchy but are still inherently sustainable and sensible locations for growth.

## **Wombourne**

- 2.19 In this context, St Philips would like to highlight that Wombourne represents a sustainable settlement to direct housing growth. Wombourne is ranked second in the proposed settlement hierarchy and is the largest of the settlements which have been designated within Tier 2. The ‘Housing Site Selection Paper 2024’ recognised the sustainability of Wombourne, noting that it contained one of the district’s three Large Village Centres and superior public transport and facilities to other rural settlements.
- 2.20 Appendix 4 of Rural Services and Facilities Audit (2021) also sets out the variety of existing services and facilities in Wombourne, including amongst others, primary and secondary schools, shops, restaurants, dental practices, and a GP. The settlement is therefore well served by local facilities.
- 2.21 Wombourne has a strong educational offer, and nearby schools include St Benedict Bishop CoE Primary School, Westfield Community Primary School and Wombourne High School. The nearest bus stop is within a 10-minute walk of site 416a, ensuring that the Village Centre (which provides a Boots Pharmacy, Beauty Salon and restaurants) can be easily reached. Health facilities (such as Dale Medical Practice) can be reached within 15 minutes by bus. Bratch Park, which provides a play area for children, is also within walking distance of site 416a and can be reached within 15 minutes.
- 2.22 The settlement of Wombourne is constrained by the Green Belt, however, site 416a is not subject to any other environmental constraints and does not accommodate any Listed Structures. Site 416a is located within Flood Zone 1 (the zone with the lowest risk of flooding) according to the Environment Agencies ‘Flood Map for Planning’. In the context of the above, it is considered that Wombourne represents a sustainable location for growth.

## **Why is the Policy Unsound?**

- 2.23 St Philips considers that the Policy is unsound as it is not consistent with national policy. Paragraph 83 of the NPPF is clear that:
- 2.24 *“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.”*
- 2.25 St Philips considers that the preferred spatial strategy does not enhance or maintain the vitality of rural communities. St Philips would therefore encourage the Council to consider an alternative spatial strategy which distributes some new housing growth outside of Tier 1 settlements. St Philips has identified that other spatial options have performed similarly to Option I within the SA 2024. St Philips would therefore recommend that the Council considers a spatial strategy which is in accordance with the aims of Paragraph 83 of the NPPF.

## **Policy SA3 (Housing Allocations)**

- 2.26 Draft Policy SA3 (Housing Allocations) sets out the housing allocations which, alongside the identified strategic allocations (SA1 and SA2), will deliver South Staffordshire’s housing
-

target for the plan period. Proformas are included within Appendix C of the PP 2024 which sets out site boundaries and site-specific planning requirements for each of the allocations.

2.27 In this regard, St Philips is concerned that site 416a has been deallocated within the PP 2024. Importantly, site 416a had previously been allocated (alongside site 416) within the PP 2022 for 79 dwellings. The justification for the allocation of site 416a was set out as follows within the ‘Housing Site Selection Topic Paper, 2022)’:

*“Site 416a is an area of greater landscape sensitivity than the majority of land around Wombourne, sitting in an area of ‘moderate-high’ sensitivity. The site is also in an area of similar Green Belt harm than the majority of land around Wombourne, sitting in an area of ‘moderate-high’ harm. However, the site is free from any significant constraints and is adjacent to an area of safeguarded land proposed for a housing allocation (Site 416). Its allocation would facilitate delivery of that site by providing access to the northern parcel of the safeguarded site and creating a more regular site shape when considered with the wider parcel.”*

2.28 The revised spatial strategy now makes no new allocations at Wombourne. The only new allocations within the PP 2024 are made at Tier 1 settlements and ‘Areas adjacent to neighbouring towns and cities (South of Stafford at Land at Weeping Cross). At Tier 2, 3, 4 and 5 Villages, the Council is relying upon safeguarded land (such as site 416) and existing planning permissions/ allocations to deliver growth in these locations.

2.29 In this regard, the ‘Housing Site Selection Topic Paper 2024’ sets out the following reasoning for making no new Green Belt allocations at Wombourne, stating:

*“The Council’s preferred spatial housing strategy does not include the allocation of Green Belt land in Wombourne. No sites performed so well as to warrant departing from the preferred strategy.”*

2.30 However, St Philips considers that the Council has not sufficiently demonstrated why site 416a was considered a sustainable site for allocation within the PP 2022, but is no longer considered to perform well enough to be allocated within the PP 2024. Indeed, St Philips believes that the deallocation of site 416a does not make logical sense.

2.31 St Philips wishes to highlight that sites 416 and 416a performed identically within the SA, with the exception that site 416a was found to have higher levels of Green Belt harm and Landscape harm. However, this was purely on the basis that site 416 had already been removed from the Green Belt, and by virtue of its safeguarded status has previously been assessed in terms of Green Belt harm and landscape impact. As set out below, site 416a does not contribute significantly to the purposes of the Green Belt. St Philips therefore considers that it is equally suitable for allocation as site 416.

2.32 The ‘Housing Site Selection Topic Paper 2022’ also recognised the benefits of allocating the site, including the creation of a more regular site shape and providing access to the northern part of site 416. Indeed, the relevant site proforma within the PP 2022 set a key requirement that 416 and 416a should be planned and delivered as a single site. St Philips therefore considers that the reallocation of site 416a would enable a more comprehensive development and provide further opportunities to deliver benefits to the local community (such as Biodiversity Net Gain and public open space). In this context, St Philips would urge the Council to reallocate site 416a within the PP 2024.

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## Green Belt

- 2.33 St Philips would like to highlight that, despite changes to the NPPF in relation to the need for Green Belt release, it does not preclude an LPA from releasing Green Belt land, so long as an LPA has satisfied the sequential approach in utilising its supply of brownfield land, optimising densities and engaging with neighbouring authorities to assist in meeting needs and demonstrating that exceptional circumstances exist (Para 146, NPPF). In this regard, the Council's 'Green Belt Exceptional Circumstances Topic Paper (April 2024)' ("the GBES Topic Paper") has already demonstrated that the sequential approach has been followed, and – crucially – that exceptional circumstances have been demonstrated. Moreover, the Council has chosen to release Green Belt – albeit only 0.16% of the District's Green Belt.
- 2.34 St Philips acknowledges that the NPPF does not require the Council to review Green Belt Boundaries and welcomes that the Council has chosen to do so anyway. Notwithstanding this, St Philips considers that there is clear justification for site 416a to also be removed from the Green Belt.
- 2.35 It is clear that site 416a makes very little contribution to the purposes of the Green Belt, as set out within Paragraph 143 of the NPPF. The development of the site would not lead to Wombourne merging with Wolverhampton. Furthermore, the site is set between Orton Lane and safeguarded land, and development within the site would not exceed the northern boundary of the safeguarded land. This would ensure no further encroachment upon the countryside.
- 2.36 The proposed development would also create a new, well-defined Green Belt Boundary and would not lead to sprawl. The deallocation of the site creates an illogical Green Belt Boundary. In this regard, St Philips notes that the NPPF is clear 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."* (Para 145) (Emphasis added)
- 2.37 The plan's evidence base has also clearly recognised the logic of removing the site from the Green Belt and allocating site 416a alongside site 416. The 'Green Belt Exceptional Circumstances Topic Paper, November 2022' recognised that:  
*"The removal of the northeast section of the site from the Greenbelt and allocation for housing represents a logical extension to the existing allocation / Safeguarded Land..."*
- 2.38 Site 416a therefore represents a logical, sustainable allocation that will contribute towards meeting the housing needs of the district and neighbouring authorities. In the context of the above, St Philips strongly urges the Council to remove site 416a from the Green Belt and reallocate the site for residential development within the Plan.

## Lack of comprehensive Development

- 2.39 St Philips notes that Appendix C of the PP 2022 previously set out the following key requirement for sites 416a and 416:

*"Ensure sites 416 and 416a are planned and delivered as a single site."*

---

- 2.40 St Philips is concerned that this key requirement has been removed from the PP 2024. In the context that the northern and southern parcels of site 416 are controlled by different parties (St Philips and Bellway Homes respectively), this omission may lead to a lack of comprehensive development.
- 2.41 Indeed, it should be noted that Bellway Homes have already submitted a planning application (Application reference: 24/00241/FULM) which only seeks approval for the delivery of the southern part of site 416. The Planning Statement for the application sets out that pre-application discussions took place with the Council and that:
- “The council were expecting that a planning application for the site would include the whole of the emerging allocation. Officers emphasised the importance of planning comprehensively. Although the northern and southern parts of the emerging allocation is controlled by different landowners/promoters, the design of the development proposed by Bellway has sought to ensure there could be future pedestrian/vehicular connections from the southern part of the site to the northern parcel. There has also been a degree of collaboration between the parties through the sharing of plans and representations to the emerging local plan.”*
- 2.42 The applicants Design and Access Statement goes on to acknowledge the potential for delivery of access to the remainder of site 416. However, there is no guarantee that the proposed development would facilitate access to the parcel to the north of the site. This creates the potential for a ransom situation which may ultimately cause issues for the delivery of site 416.
- 2.43 Furthermore, Bellways Homes’ proposal does not explore the potential for a comprehensive masterplan solution which would address the wider site capacity, implication for the wider development in terms of landscape impact, ecology and biodiversity, delivery of on site open space to meet policy requirements and delivery of a wider drainage and SUDS solution, as well as the location of the site in terms of the adjoining Conservation Area. As a result, the proposed development has not been planned comprehensively and would fail to achieve a high quality design. This conflicts with paragraph 137 of the NPPF.
- 2.44 The allocation of site 416a would resolve some of these issues as St Philips would not need to rely on another landowner to deliver access the northern parcel of 416. St Philips would also urge the Council to reintroduce the key requirement that site 416 and 416a must be planned and delivered as a single site. This would ensure that the allocation is delivered as a well designed, comprehensive development.

### **Land at Orton Lane**

- 2.45 As set out within the accompanying vision document, the land at Orton Lane comprises two distinct parcels of land. The western parcel (1.01ha) forms part of Housing Site 416 which is a draft allocation under Policy SA3 of the PP 2024. The eastern parcel (0.88ha) was previously allocated within the PP 2022, however has been deallocated within PP 2024. It lies adjacent to site 416 and is referred to as Site 416a.
- 2.46 The site itself is located within the Green Belt, however, it is not subject to any environmental constraints and does not contain any listed structures. The site is located within flood zone 1 and is therefore within the zone at the lowest risk of flooding. As set out
-

within the attached Vision Document (Appendix 1), the site could provide approximately 130 dwellings in total.

2.47 It is proposed that the existing trees and hedgerows within the site would be retained wherever possible and a biodiversity net gain of at least 10% would be delivered. Vehicular access would be provided from Orton Lane whilst a permeable, well-connected pedestrian network would encourage active travel. An integrated sustainable drainage strategy would ensure that surface water runoff is appropriately managed.

2.48 In this context, St Philips would encourage the Council to consider allocating the land at Orton Lane within the PP.

### **Why is the Policy unsound?**

2.49 The NPPF is clear 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.” (Para 145) (Emphasis added)*

2.50 Paragraph 148 (f) goes on to state that, when defining Green Belt Boundaries, plans should:

*“define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

2.51 St Philips considers that the deallocation of site 416a creates an illogical Green Belt Boundary which is not *likely to be permanent*, in conflict with the NPPF. The plan is therefore unsound as it is not consistent with national policy. In this context, St Philips would encourage the Council to consider reallocating site 416a for residential development within the plan.

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# **Appendix 1 Vision Document**

ORTON LANE  
**WOMBOURNE**

**Vision Document**

December 2019



## ST PHILIPS

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Graphic Design\Documents\Vision Document\31171 Orton Lane Vision 07.indd

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**Date** 11.12.2019 **Status** Final **Rev** -

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# 1. Vision

The site at Orton Lane presents the opportunity to integrate development seamlessly with the surrounding countryside and village of Wombourne. The design will sensitively respect local characteristics, drawing inspiration from Wombourne and ensuring the creation of an attractive and locally distinctive place to live. The retention and enhancement of mature trees and vegetation, combined with the provision of a network of connected footpaths, will ensure the site complements the surrounding site context and encourages active lifestyle choices.







## 2. Introduction

This Vision Document has been prepared on behalf of St Philips Ltd to support the promotion of the site for residential development at Orton Lane, Wombourne, through the South Staffordshire Local Plan review process.

The site comprises two distinct parcels of land as follows;

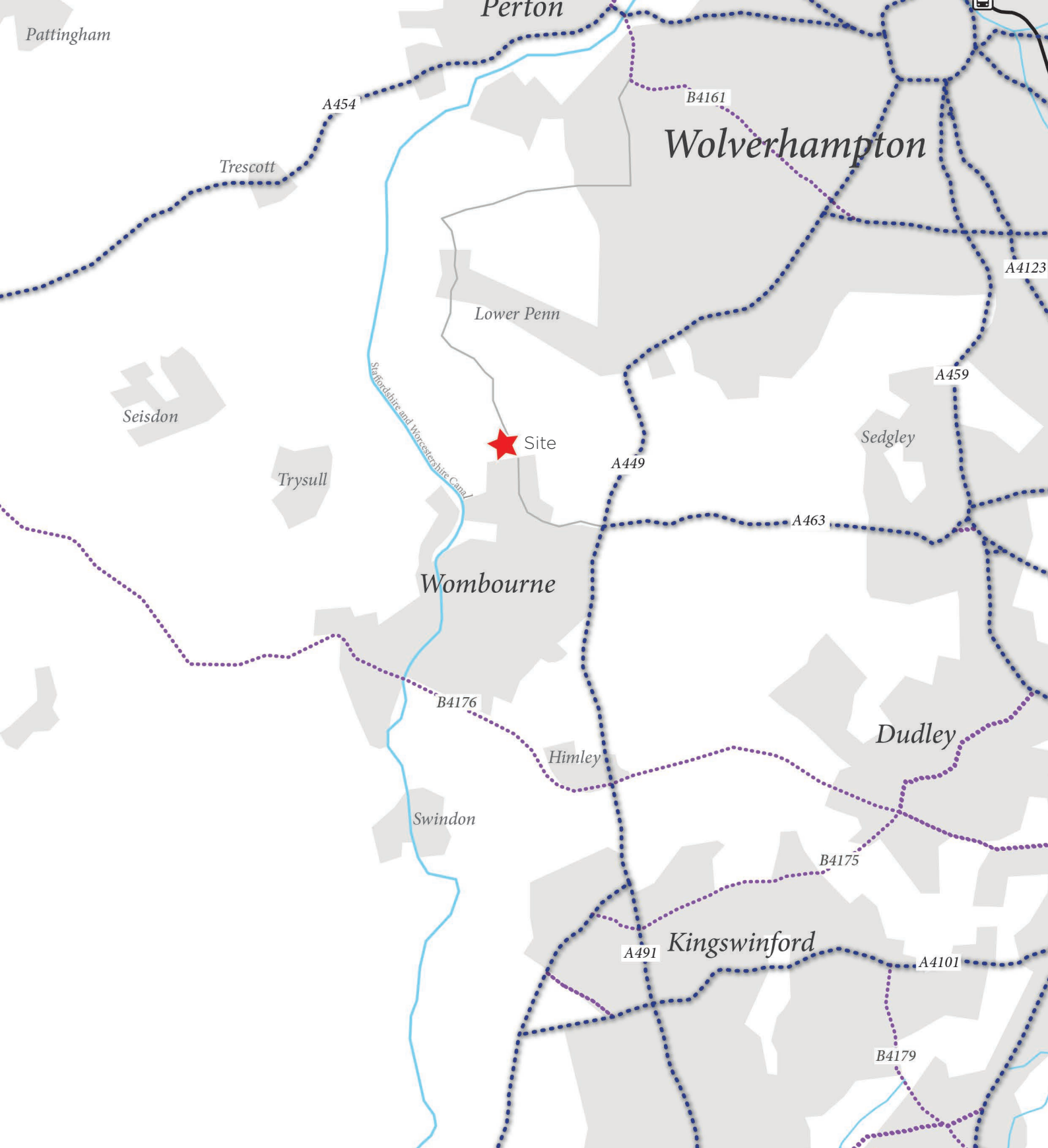
**Western parcel** - This comprises 1.01 ha of land and forms the northern part of the current Safeguarded Land within the adopted Local Plan as Site 416. The land is already removed from the Green Belt through the Site Allocation Document to meet the future needs of the District and which would come forward as a part of comprehensive development of the entire site; and

**Eastern parcel** - The land comprising the curtilage of 79 Orton Lane which includes 0.88 ha is now available for development and is being promoted by St Philips for residential development as a “small site” under 1ha. The land is proposed to be removed from the Green Belt and included as a strategic allocation through the Local Plan Review process.

This document demonstrates how sustainable residential development of the site can be achieved. The key aims and objectives of the document are:

- » to review the site in the context of current planning policy;
- » to present an initial understanding of the site’s constraints and opportunities; and
- » to present an emerging concept master plan, accompanied by an explanation of the key design principles that have informed it.

The 1.89 ha site, 1.01ha of which forms part of the wider potential allocation site 416, is located approximately 1.5km north of Wombourne town centre, which offers a wide range of services and facilities. The site is bounded by horse grazed pastures to the north, west and south with Orton Lane running parallel to the eastern boundary. The wider landscape comprises further pasture fields, woodland and residential housing.



Pattingham

Perton

A454

Trescott

B4161

Wolverhampton

A4123

Lower Penn

A459

Seisdon

Site

Sedgley

Trysull

A449

A463

Wombourne

Saffordshire and Worcestershire Canal

B4176

Dudley

Himley

Swindon

B4175

A491

Kingswinford

A4101

B4179



## 2.1. Planning Policy Context

**Land at Orton Lane, Wombourne is located within the admirative area of South Staffordshire District Council (“the Council”) and is partly within the West Midlands Green Belt.**

The Council adopted the Core Strategy in 2012, which set out the District’s spatial strategy for growth up to 2028. Subsequently, to deliver the strategy, the Council adopted the Site Allocations Document 2018 [SAD] in 2018. As a part of the SAD, the Council also allocated ‘Safeguarded Land’ to meet the longer-term development needs for the period 2028-2038.

The site comprises of two distinct parcels of land. The western parcel (c.1Ha) falls within the Safeguarded Land Site 416, which was removed from the Green Belt through the SAD. However, the eastern parcel continues to remain within the West Midlands Green Belt.

### Emerging Local Planning Policy

The Council is now reviewing the adopted Core Strategy (2012). As a part of this, the Council is currently consulting on the ‘Spatial Housing Strategy & Infrastructure Delivery’ document. The Local Plan Review is, fundamentally, still at an early stage and the Council now have the task of identifying potential suitable sites for allocation for housing development.

This Vision Document concentrates on identifying the key challenges for the Local Plan Review in the context of the National Planning Policy Framework (2019) (NPPF). It also demonstrates to the Council that the site presents the Council with two cogent opportunities:

- 1 Western parcel** – The release of the western parcel, which forms part of the Safeguarded Land Site 416, to could come forward as a part of a comprehensive development of the entire site; and
- 2 Eastern parcel** – The release of the site from the West midlands Green Belt, to come forward as a small site under 1Ha.

Taken together, the site could deliver c.1.89Ha of residential land equating to c.65 dwellings. This would represent an additional c.30 dwellings on top of the potential allocation of the Safeguarded Land Site 416.

### Housing Need and the Duty to Cooperate

The NPPF is clear that the Council should, as a minimum, meet its objectively assessed housing needs, as well as any unmet housing needs in neighbouring authorities (Para 11b). It is also clear that this should be “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” (Para 35c).

The Council have acknowledged the need to meet some of the Greater Birmingham 4,000-dwelling contribution. However, the Council has not presented an evidence-led approach to how this figure was derived.

The scale of the unmet housing needs across the GBHMA is significant and acute, and to date there has been a lack of an evidence-led basis for agreeing to the spatial distribution of these strategic needs. Subsequent changes to way housing need is calculated in the NPPF is also likely to have increased this need further. There is a need – if not requirement – for the Council and other GBHMA authorities to work together to sustainably address these needs. However, this needs to be underpinned by a robust and evidence-led approach.

Such an approach should consider the functional relationship between the various local authority housing market areas within the GBHMA. It should take account of the socio-demographic and economic trends within the GBHMA, and conclude on an agreed spatial distribution of these unmet housing needs. Without this, the Council and other GBHMA authorities will not properly address the level of housing growth required, which will have significant adverse impacts across the GBHMA.

## Green Belt Release

Over 80% of the District falls within the West Midlands Green Belt, and the District has a distinct lack of available brownfield land. Taken together, and when considering the unmet housing needs pressures arising from the GBHMA, there is a cogent need to review the Green Belt to ensure that the housing needs of the District, and wider GBHMA are met, in accordance with the Framework (Para 11b).

In this regard, the NPPF is clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances (Para 136) but goes on to set out a set of criteria which should be satisfied prior to establishing exceptional circumstances (Para 137); a sequential approach of sorts. Where exceptional circumstances are demonstrated, the NPPF also states that when reviewing Green Belt boundaries, account should be taken of the need to promote sustainable patterns of development (Para 138).

## A Sustainable Distribution of Growth

The Council is proposing an 'Infrastructure-led' approach, which seeks to deliver growth in areas that would enable the delivery of identified infrastructure needs. It is considered that any future spatial growth strategy should focus development in the most sustainable settlements, which have capacity to accommodate further growth, and benefit from a variety of existing services and facilities.

The Council's 'Rural Services and Facilities Audit 2019' identifies Wombourne as one of the largest Tier 2 Settlements, with access to shops and restaurants, primary and secondary schools, and a GP. It is evident that Wombourne has high sustainability credentials, as it is well-served by existing services and facilities, with access to existing transport routes and infrastructure. A strategy which includes development on the edge of Wombourne would represent the most appropriate strategy for securing the spatial distribution of growth in the District over the Plan period. It would also help to alleviate worsening affordability pressures within the settlement.

## Development Potential

### **Western parcel**

The western parcel falls within the Safeguarded Land Site 416, which was removed from the West Midlands Green Belt, and safeguarded for future development in the SAD. The SAD was clear that the Local Plan Review process would determine 'what role safeguarded land could have' in meeting the housing needs (Para 7.20).

The c.1.89Ha site is located approximately 1.5km north of Wombourne town centre. As noted above, Wombourne is well-equipped to accommodate further growth, by virtue of the availability of existing services and facilities, and good access to public transport. It is entirely appropriate for the Council to direct further growth to the settlement, through the release of the Safeguarded Land Site 416.

### **Eastern parcel**

The NPPF is clear that, where amendments to Green Belt boundaries are required, consideration should be given to land which has been previously-developed and/or is well-served by public transport (Paragraph 138). Whilst the NPPF also supports meeting housing needs through larger scale developments (Para 72), it is also clear that small/medium sized sites can make an important contribution to meeting housing needs. It goes on to state that local authorities should seek to identify 10% of their housing need on sites under 1Ha (Para 68a).

The Council will need to ensure that it seeks to allocate a mix of sites to meet its needs, and promotes sustainable patterns of development by having regard to Green Belt sites well-served by public transport. In this context, the eastern parcel, is located on the edge of one of the most sustainable settlements within the District, with good access to public transport. The allocation of the eastern parcel, separate from the allocation of the wider Safeguarded Land, would capitalise on the settlement sustainability credentials and could contribute towards the Council's 10% small-site requirement.

Alongside this, it could contribute to the District's housing land supply and could be delivered within the first five years of the plan period. It is therefore suggested that the Council considers the potential allocation of this site for residential development through the next stages of the emerging Local Plan Review.

## 3. Technical Summaries

**This section provides a summary of the technical assessments undertaken to date; further assessments would be needed prior to the preparation of any planning application.**

### 3.1. Access

The site is accessible via sustainable modes of transport. There are bus stops on Bull Meadow Lane within an 800m walking distance of the site. Both stops are lit and the bus stop on the western side of Bull Meadow Lane provides shelter. These stops provide half hourly services to Wolverhampton, Stourbridge and Merry Hill shopping centre.

Cycle routes such as The South Staffordshire Railway Walk and the Staffordshire and Worcestershire Canal towpath provide access to key employment areas such as southwest Wolverhampton and Pensnett near Dudley. The South Staffordshire Railway Walk is accessible

approximately 1.1km from the site, while the Staffordshire and Worcestershire Canal towpath is accessible approximately 300m west of this route, approximately 1.4km from the site.

Key local amenities, including convenience stores, a leisure centre, a library and community centre and both a High School and Primary School are accessible within a 2km walk from the site. These can be accessed via existing footways.

A safe and suitable access can be provided for vehicles and pedestrians from Orton Lane at the south-east boundary of the site. This access will measure 5.5m in width with a footway 2m in width.

Pedestrian facilities can be improved through providing a new pedestrian footway on the western side of Orton Lane that links the proposed site access to the existing footway provision to the south.



### 3.2. Ecology

The Environmental Dimension Partnership Ltd (EDP) was commissioned by St Philips to undertake an Ecological Appraisal in an area of land at Orton Lane, Wombourne.

The baseline ecological investigations undertaken included a Desk Study and Extended Phase 1 Habitat Survey. All surveys were undertaken with reference to best practice guidance where this exists.

Two statutory designations and four non-statutory designations lie within the potential Zone of Influence (Zoi) of the site, however, no impacts on these designated sites are anticipated as a result of the proposed development.

The survey work confirms that the site comprises habitats of local to less than local value. This includes hedgerows, species-poor semi-improved grassland, scattered mature trees, tall ruderal with bare ground and spoil. In addition, the Site is considered likely to support breeding birds and bats.

Recommendations for the retention of key ecological features (hedgerows and scattered mature trees) have been made as well as recommendations for enhancement measures including the creation of a wildflower meadow, provision of bird and bat boxes and a sensitive lighting scheme. On this basis, EDP considers that the scheme is capable of compliance with relevant legislation and planning policy for the conservation of the natural environment at all levels.

## 4. Landscape Character

### 4.1. National Landscape Character: NCA: 66 Mid Severn Sandstone Plateau

Landscape Character Assessment at a national level of study is recorded by Natural England (NE) within 159 National Character Areas (NCA). The site and its immediate surroundings lie within the National Character Area profile: NCA 66 Mid Severn Sandstone Plateau. NCA 66 is a large area extending to more than 88,000ha

### 4.2. Regional Landscape Character:

#### Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan 1996-2011

Staffordshire County Council's SPG: 'Planning for Landscape Change' is now over 20 years old and describes the landscape character of Staffordshire in 22 different Landscape Character Types (LCTs).

The site and its setting fall within LCT – 'Sandstone estatelands; sub-type: Farmland. The characteristic landscape features include: Well treed stream valleys; small broadleaved copses; intensive arable farming; hedged field pattern; gently undulating landform.

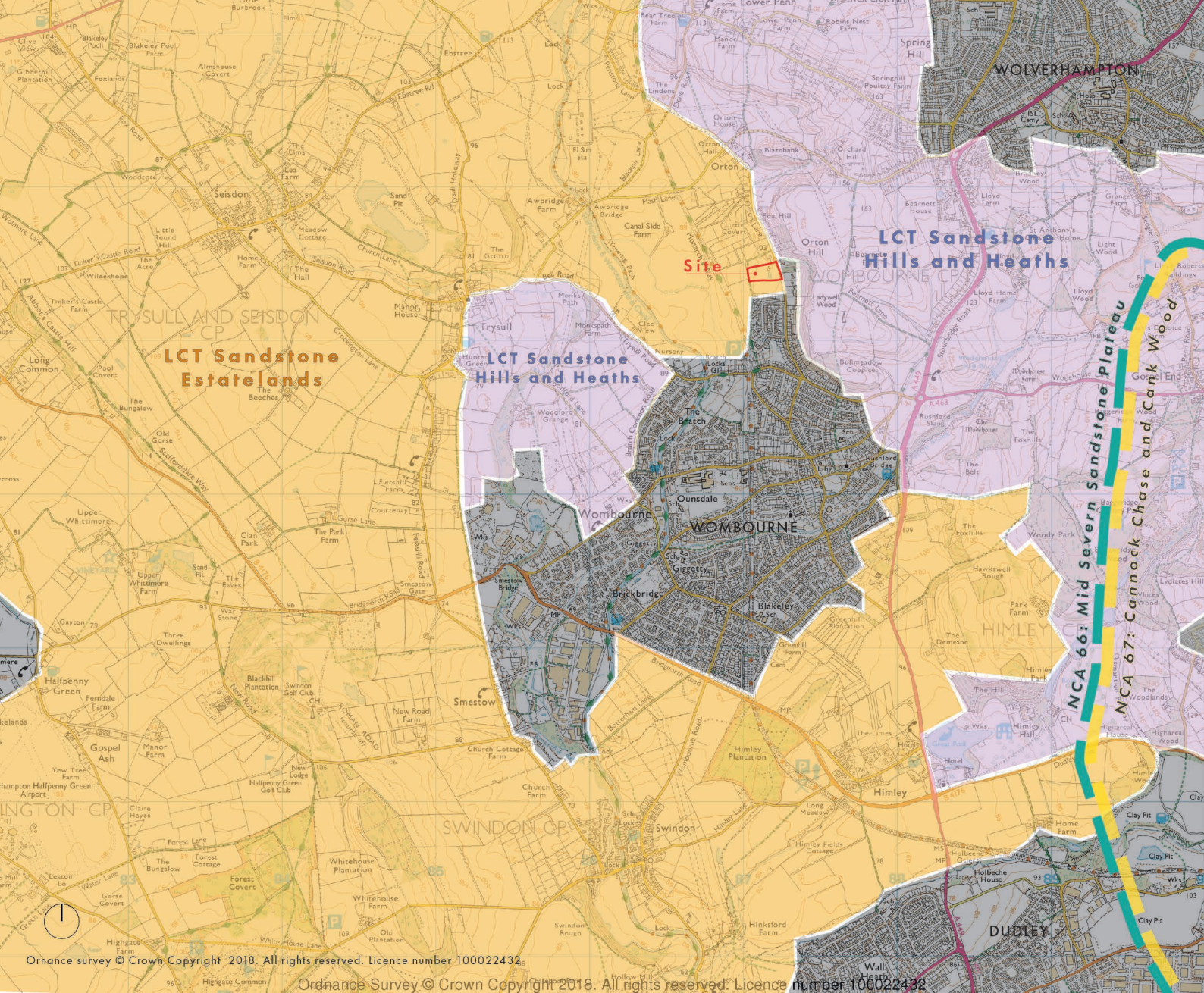
### 4.3. Local Landscape Character: Landscape Sensitivity Study (2017 Update)

The Wombourne focus area is split into Land Cover Parcels (LCPs). The site lies within the LCP WM1 which extends beyond the northern tip of Wombourne settlement. "A very prominent wooded sandstone ridge provides a strong landscape feature to the east. The area is mainly used for horse grazing with fields being divided by tape/fencing typically associated with this use." WM1 has been assessed to be a landscape of high sensitivity to housing development.

Key characteristics, as recorded within the LSS, pertaining to the site and its surrounding include:

- » A varied rolling/undulating topography
- » Many small streams in shallow valleys
- » A well-defined irregular field pattern
- » Arable and pastoral farming
- » Network of narrow lanes, often with hedge banks
- » Large numbers of hedgerow oak and ash
- » Small, irregular patches of ancient woodland
- » Clustered settlement pattern of scattered farmsteads and roadside dwellings
- » Traditional red brick farmsteads and dwellings with clay tile roofs





## Landscape Character Plan

- |   |  |   |  |
|---|--|---|--|
|  | Site Boundary                            |  | Staffordshire County Council LCT: Sandstone Hills and Heaths |
|  | County Boundary                          |  | Staffordshire County Council LCT Sandstone Estatelands       |
|  | Natural England: National Character Area |   |  |
|  | Settlement                               |   |  |

#### 4.4. Landform

The site has a gently sloping landform rising 95m AOD in the south-west to 100 m AOD to the north-east.

The wider setting of the site comprises a rolling landform with the western area with the watercourses forming the low-lying areas and rising to the immediate east, north-east and south-east. Several hills form this rolling landform including Orton Hill, one of the higher areas (163 AOD) in the landscape, approximately 650m to the east of the site.

#### 4.5. Settlement Pattern

The nearest major settlement to the site is Wolverhampton. Wolverhampton is not visible from the site. However, the site's southern boundary is less than 100m from the northern boundary of the village of Wombourne which is considered to be a 'Main Service Village' within South Staffordshire. Wombourne being in such close proximity, is visible from the site.

The settlement pattern in the area reflects the transport corridors. Smaller built up areas are generally ribbon development concentrated around junctions of roads and larger built up area being situated off the A449, generally to the west of the A road. To the immediate east of the site, ribbon development extends northwards from Wombourne, along Orton Lane towards Orton,

where a small cluster of houses are present. The site, although not adjoining the immediate edge of Wombourne is well related to the settlement to the south and east.

#### 4.6. Tree Cover

Tree cover within the immediate setting comprises long stretches of linear woodland in particular to the east of the site, along the sharp rise to Orton Hill. This belt of woodland known as Ladywell Wood is also listed as an Ancient & Semi-Natural Woodland (ASNW).

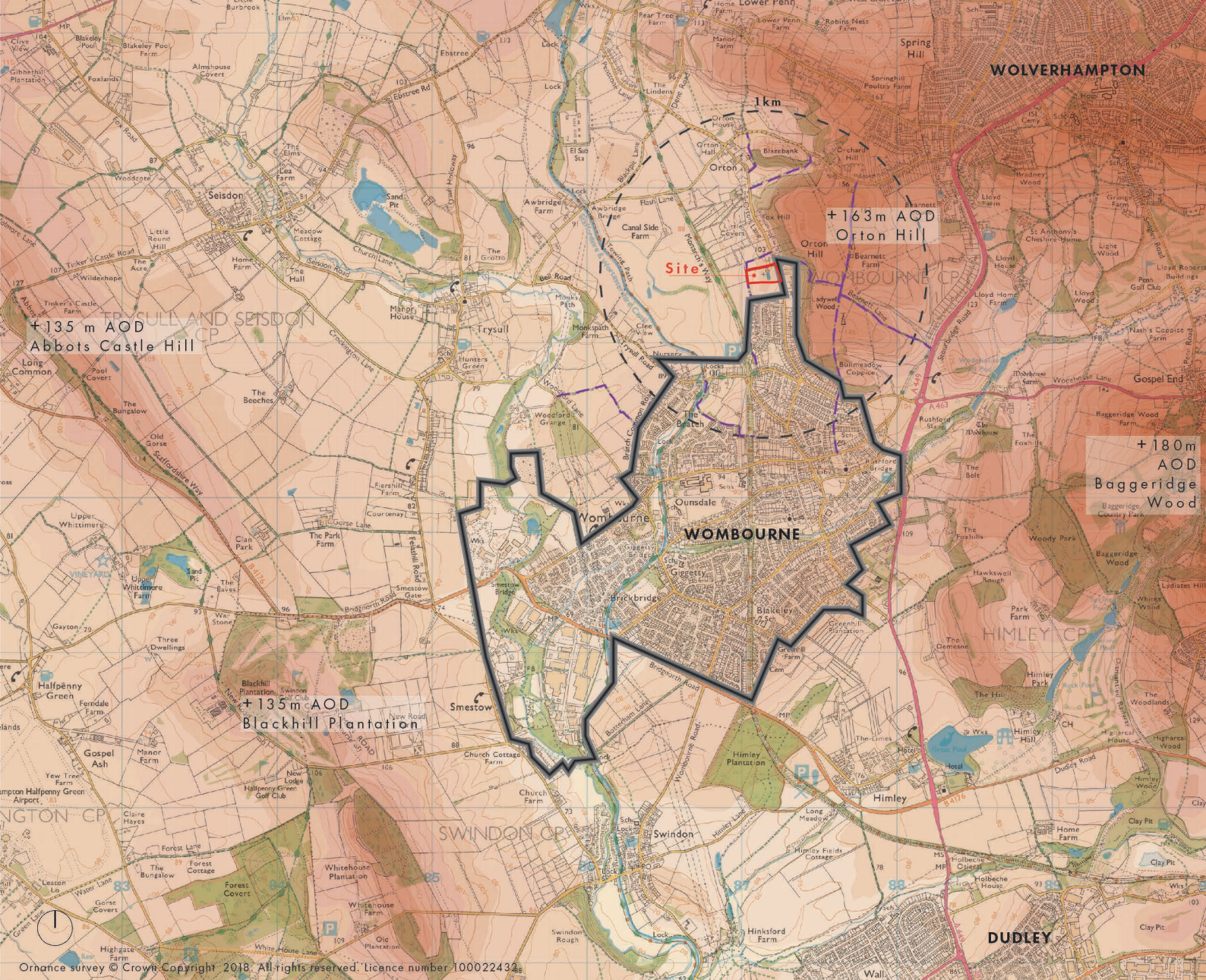
The fields in the immediate vicinity of the site are devoid of trees and the site is an anomaly in the area with numerous trees being present. The tree cover on site comprises the field boundary, many of which are evergreen in nature to provide visual screening to the dwelling within the site. The remainder of the trees on site are in association with the dwellings' garden.

#### 4.7. Views and Visual Amenity

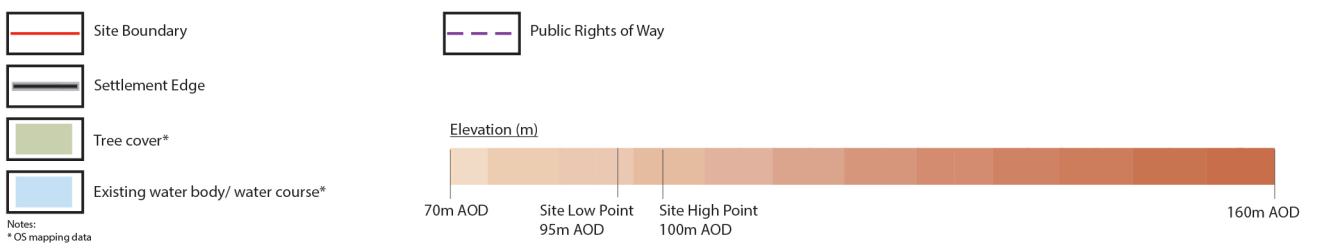
The site is well contained by the existing hedgerow boundaries, with glimpsed views of the village of Wombourne to the south, through the gaps in the vegetation.

The views from further afield tend to showcase extensive tree cover with well treed ridges being a common feature as characteristic of NCA 66.





Site Context Plan





## 5. Green Belt

**The fundamental aim of Green Belt policy stated in National Policy Planning Framework (NPPF) 2019 at paragraph 133 is to prevent urban sprawl by keeping land permanently open.**

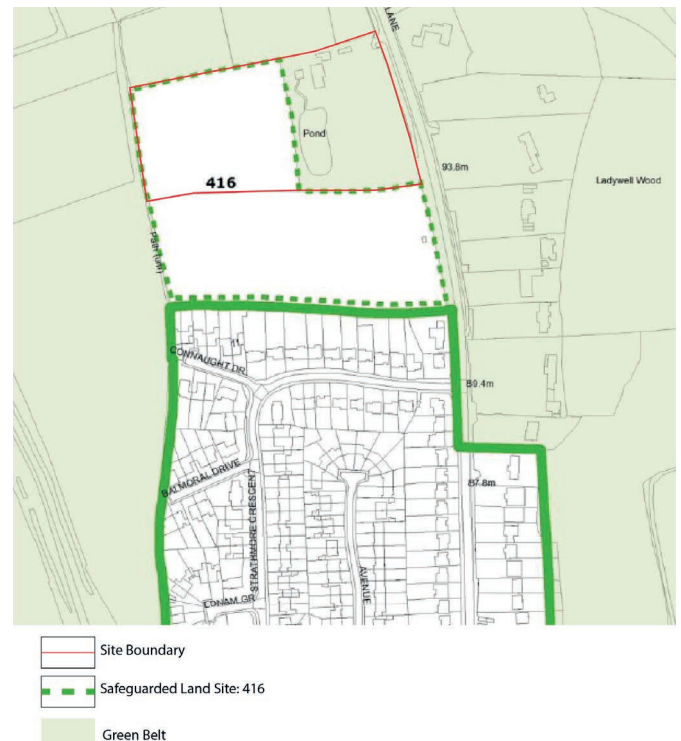
The South Staffordshire Green Belt Study – Stage 1 and 2 Report (July 2019) considers the land within the administrative boundaries of South Staffordshire. The Green Belt Study has been undertaken in two stages. Stage 1 – identifies the contribution of Green Belt Land, on a three-point scale ranging from weak to moderate to strong, against the purposes as defined in the NPPF. Stage 2 assesses the potential ‘harm’ of removing land from the Green Belt on a seven-point scale ranging from very low harm to very high harm.

The Site Allocations DPD, adopted in 2018, amended the Green Belt boundary around inset villages to accommodate allocated and safeguarded land sites. The western part of the site falls within Safeguarded Land Site: 416 and has been consequently removed from Green Belt land. The eastern part of the site, however, continues to remain with Green Belt land.

The eastern half of the site falls within Parcel S53 part of the Green Belt Study. Green Belt Purposes 1,2 and 3 have relevance to the site. Parcel S53 is assessed to have moderate contribution against

Purpose 1, weak/no contribution against Purpose 2 and strong contribution against Purpose 3.

Parcel S53 has been further divided into sub-parcels and scenarios for the assessment of ‘harm’ and the site falls within S53C – North of Wombourne, Scenario -s1 -Release of any land to the north of the Staffordshire and Worcestershire Canal. S53Cs1(61.54ha) has been assessed to be of Moderate-High ‘Harm’ rating. The eastern part of the site at 1.05ha comprises less than 2% of S53Cs1.





## South Staffordshire Green Belt Plan



Source:  
 \*South Staffordshire Green Belt Study Stage 1 and Stage 2 Report - July 2019



## 5.1. Proposed Green Belt Change

The opportunity exists to release the remainder of the site to deliver additional housing. The additional release of land would allow:

- » A new Green Belt boundary to the north of Wombourne which sits along clear physical features that are likely to be permanent.
- » The new Green Belt boundary would follow existing physical features including Orton Lane to the east and existing hedgerow to the north.

## 5.2. Purpose 1 NPPF: (a) to check the unrestricted sprawl of large built-up areas Proposed Green Belt Change

The proposed Green Belt boundary would sit along clearly defined boundaries.

- » Land released would not cause unrestricted sprawl north east towards Wolverhampton.
- » Orton Lane and Ladywell Wood ASNW sit to the east of the site and would prevent any eastward and north-eastward sprawl towards Wolverhampton.
- » Ribbon development already exists along Orton Lane to the site's eastern boundary.
- » Creation of a new and resilient Green Belt boundary along existing physical features.

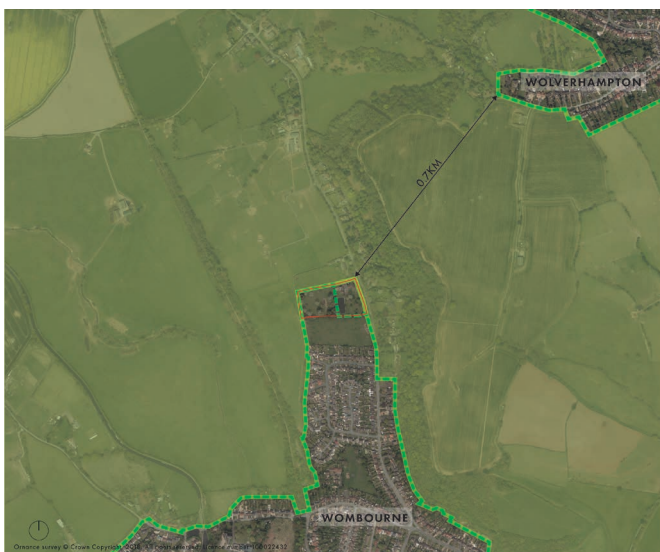




### 5.3. Purpose 2 NPPF: (b) to prevent neighbouring towns merging into one another

The proposed Green Belt boundary would not cause Wombourne to merge with Wolverhampton.

- » The proposed Green Belt would be approximately 0.7km deep between Wombourne and Wolverhampton, at its narrowest.
- » Elements in the landscape which would contribute to Green Belt being likely to be permanent include: 1. Woodland 2. Farmland 3. Topography



### 5.4. Purpose 3 NPPF (c) to assist in safeguarding the countryside from encroachment

The proposed Green Belt boundary would not cause significant encroachment into the countryside.

- » The western part of the site is outside the Green Belt and the release of eastern area would form a clear limit preventing encroachment.
- » The land is affected by urban influences to the south and east.
- » It does not form part of the wider countryside and clearly relates to the settlement.



## 6. Constraints & Opportunities

The constraints impacting development have been assessed and how these impact upon the potential to accommodate residential development in relation to the:

- » **Western parcel** - comprising the northern part of site 416, including 1.01ha of land.
- » **Eastern parcel** - comprising the curtilage of 79 Orton Lane, including 0.88ha of land.

The plan opposite demonstrates the land areas concerned.

### Access and movement

Primary vehicular access will be from Orton Lane. The pedestrian movement network will connect with the existing public rights of way network, providing links to the wider pedestrian network and surrounding countryside, including the South Staffordshire Railway Walk and associated nature reserve. Pedestrian links will also be provided to the rest of potential site allocation 416 to the south of the site boundary.

### Landscape and topography

Existing trees and hedgerows will be retained wherever possible, contributing to the layout of the master plan and helping create a distinctive character.

### Drainage and flood risk












The site is not located within flood zones 2 or 3. New areas of attenuation will be integrated within the open space network to help manage surface water drainage and enhance areas of public open space.

### Ecology

The development will seek to maximise opportunities to enhance biodiversity and ecology wherever possible.



Constraints and Opportunities Plan

- |   |                      |   |                      |   |                    |
|---|----------------------|---|----------------------|---|--------------------|
|  | Site boundary        |  | Green Belt           |  | Listed building    |
|  | Public Right of Way  |  | Existing watercourse |  | Proposed Access    |
|  | Local Nature Reserve |  | Flood Zone 2         |  | Allocated Site 416 |
|  | Existing woodland    |  | Flood Zone 3         |   |                    |



## 7. Concept Plan

A Concept Plan has been prepared to seek to demonstrate the individual and combined capacity of:

- » The Eastern Parcel
- » The Western Parcel
- » Site 416 including the Eastern Parcel.

The Concept Plan has been informed by the vision and site constraints and opportunities.

### The Eastern Parcel

The land comprising the curtilage of 79 Orton Lane includes a total area of 0.88 ha. This site has the potential to come forward as a “small site” to form a subsequent addition to the safeguarded land under Site 416. Individually, subject to the removal of the site from the Green Belt and its allocation through the Local Plan Review, the site has the potential to accommodate approximately an additional 30 dwellings over and above the capacity of Site 416.

### The Western Parcel

The western parcel of land forms part of the wider area of Safeguarded Land under Site 416 and has already been removed from the Green Belt. The land comprises a total of 1.01 ha and would deliver circa 35 dwellings.

### Site 416

The safeguarded site 416 comprises 2.8ha and has the potential to deliver circa 100 dwellings at a density of around 35 dwellings per hectare. The Eastern Parcel comprising the curtilage of

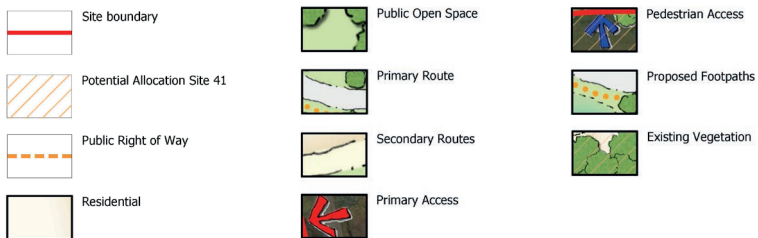
79 Orton Road would result in a potential uplift in the capacity of around 30 dwellings to a total combined amount of around 130 dwellings.

The scheme has also been shaped by the following design principles:

- » Vehicular access from Orton Lane.
- » Establish a resilient Green Belt boundary.
- » Provision of a well-connected and permeable movement network that encourages active travel and enables vehicular access and circulation within the development. Development blocks are arranged to ensure overlooking of public areas.
- » Pedestrian links to the south of the site, connecting with the wider potential allocation site.
- » Provide attractive and safe pedestrian connections to the public rights of way network.
- » Retention of existing boundary hedgerow and mature trees.
- » Management of surface water run off through the integration of a sustainable drainage strategy.
- » Development set back from Orton Lane with buildings orientated to limit the impact of road noise.



## Concept Plan



## 8. Summary of Key Benefits



The provision of approximately 65 new homes that include a mix of dwelling types and tenure.



A wholly deliverable site that is appropriately and sustainably located.



A connected scheme that is responsive to its existing site features and incorporates an attractive pedestrian and cyclist network, providing car free routes within the scheme and links to the public rights of way network.





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