

SOUTH STAFFORDSHIRE LOCAL PLAN PREFERRED OPTIONS NOVEMBER 2021

LAND OFF STATION ROAD, CODSALL

**REPRESENTATION PREPARED ON BEHALF OF
RICHBOROUGH ESTATES**



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



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APPENDICES:

Appendix 1: Site Location Plan

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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 Station Road, Codsall, 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 at Station Road, Codsall, can facilitate significant infrastructure provision, including the following infrastructure opportunities identified within the IDP:

- 30 space car park to serve Codsall Railway Station
- Improvements to sports and leisure facilities within the District.
- 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 at Station Road, Codsall.

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, 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 to be delivered 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. The site comprises approximately 100 hectares of land, situated to the west of junction 12 of the M6, east of the A449 and north of the A5. The site comprises a number of irregularly shaped field parcels, alongside some elements of previously developed land. The site is bisected by the Staffordshire and Worcestershire Canal, whilst the West Coat Mainline runs through its western edge.
- 3.28 The site is also located to the South of South Staffordshire College, which is understood by Richborough Estates as being promoted through this Local Plan Review for potential longer-term residential use. As such, Land North of the A5 provides the opportunity for the two sites to be brought forward in collaboration and, therefore, Richborough Estates will work cooperatively on future master-planning to ensure a comprehensive and sustainable site could be delivered.
- 3.29 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 Station Road, Codsall, 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).

4.4 Further information in respect of Land adjacent to 44 Station Road, Codsall, is included at Chapter 7 of this Representation.

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.”*

5.31 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.

5.32 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

5.33 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

- 5.34 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

- 5.35 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

- 5.36 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.
- 5.37 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.

- 5.38 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

- 5.39 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.
- 5.40 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

- 5.41 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

- 5.42 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

- 5.43 Policy EC10 confirms that specific infrastructure requirements will be identified in relevant policy areas and site proformas.
- 5.44 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

- 5.45 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

- 5.46 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

- 5.47 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.
- 5.48 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 Adjacent to 44 Station Road, Codsall – Site Ref: 224

6.5 Land Adjacent to 44 Station Road, Codsall is assessed within the SA under site reference: 224. 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
224	+/-	--	+/-	--	-	-	+	-	-	-	-	+

Figure 6.1: Significance of effects pre-mitigation, Site Ref: 224

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
224	+/-	+	+/-	--	0	-	+	-	0	-	-	+

Figure 6.2: Significance of effects post-mitigation, Site Ref: 224

- 6.6 These assessments are broadly supported, although Richborough Estates does not agree with the finding that the development of the Site would result in a Major Negative impact upon landscape and townscape.
- 6.7 The SA states that this Major Negative impact is considered to arise due to the site needing to be released from the Green Belt. However, the SA also sets out that site is only considered to result in a 'moderate-high' harm to the Green Belt (as opposed to a potential 'high' or 'very high' level of harm), as concluded by the Green Belt Study which supports the LPR⁷.
- 6.8 The Green Belt Study shows Land off Station Road, Codsall, as falling within Green Belt Sub-Parcel Ref S53H – ‘West of Codsall’, 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 contains no or very limited urban development, and has strong openness. It is close enough to the large built-up area to have some association with it, but also retains some distinction.	Moderate
P2: Preventing the merging of neighbouring towns	Land plays no significant role due to the distance between the West Midlands conurbation and the nearest neighbouring towns.	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

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

Table 6.1: Land Parcel S53H Contribution Towards Green Belt Purposes

6.9 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: S53H extends significantly beyond Land off Station 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	Moderate	Weak / No contribution
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 6.2: Land off Station Road, Green Belt Assessment

6.10 It is duly contended that the SA impact score should be tempered to a Minor Negative ('-') score.

7.0 Land off Station Road, Codsall

Site Description

- 7.1 Richborough Estates has current land interests in land at Station Road, Codsall, as shown on the Site Location Plan appended to this representation (see **Appendix 1**).
- 7.2 The site adjoins the south-western edge of the urban area of Codsall, immediately south of the Birmingham to Shrewsbury railway line and west of the Station Road. The site is well contained and includes an area of agricultural land and woodland.
- 7.3 The parcels of land are subdivided by existing tree/hedgerow boundaries associated with the agricultural use of the land. The site is identified as Grade 3b quality agricultural land and therefore does not represent best and most versatile land (BMV).
- 7.4 The site lies within the West Midlands Green Belt but is adjacent to the current development boundary of Codsall. The site is located in Flood Zone 1; land having less than 1 in 1,000 probability of annual flooding. The site is also flat and not constrained topographically. The site represents a sustainable location, close to the village centre and opposite Codsall railway station.
- 7.5 The site has no other environmental or historical designations.

Green Belt

- 7.6 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.

- 7.7 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

- 7.8 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.

West Midlands Conurbation

- 7.9 Paragraph 3.15 of the Green Belt study describes the area that has been identified as ‘*the West Midlands conurbation*’, which is defined as the main ‘*large built-up area*’ against which Purpose 1 of the Green Belt is considered.
- 7.10 The Study identifies that Codsall (contiguous with Billbrook) is considered to have sufficient separation from the main built-up area of Wolverhampton in order to be distinctly separate from the West Midlands conurbation.
- 7.11 Richborough Estates agrees with this assessment. Sites which separate Codsall and Billbrook from the West Midlands Conurbation⁸ therefore play an important role in their contribution towards Green Belt Purpose 1.

Land off Station Road, Codsall; Contributions to Green Belt Purposes

- 7.12 The Green Belt Study shows Land off Station Road, Codsall, as falling within Green Belt Sub-Parcel Ref S53H – ‘*West of Codsall*’, 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 contains no or very limited urban development, and has strong openness. It is close enough to the large built-up area to have some association with it, but also retains some distinction.	Moderate
P2: Preventing the merging of neighbouring towns	Land plays no significant role due to the distance between the West Midlands conurbation and the nearest neighbouring towns.	Weak / No contribution
P3: Safeguarding the countryside from	Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does	Strong

⁸ Site Refs: 221, 210 and 503.

encroachment	not have a stronger relationship with the urban area than with the wider countryside.	
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 7.1: Land Parcel S53H Contribution Towards Green Belt Purposes

7.13 The Study goes on to identify that, should Green Belt Sub-Parcel ref: S53Hs2 (within which Land off Station Road falls) be released for development, the resulting harm would be 'moderate-high', stating:

"The sub-parcel makes a strong contribution to preventing encroachment on the countryside and a moderate contribution to preventing the sprawl of the West Midlands conurbation. Although these parts of the sub-parcel are separated from the edge of the adjoining inset settlement of Codsall by Oaken Lanes and a railway line, they are well contained by tree cover, as well as the existing house and grounds in the south of the sub-parcel to the east of the stream. These parts of the sub-parcel are also more strongly separated from the inset settlement of Oaken to the west. Release of this land would constitute a limited weakening of the Green Belt."

Harm Ratings Overview Map of Land within Sub-Parcel

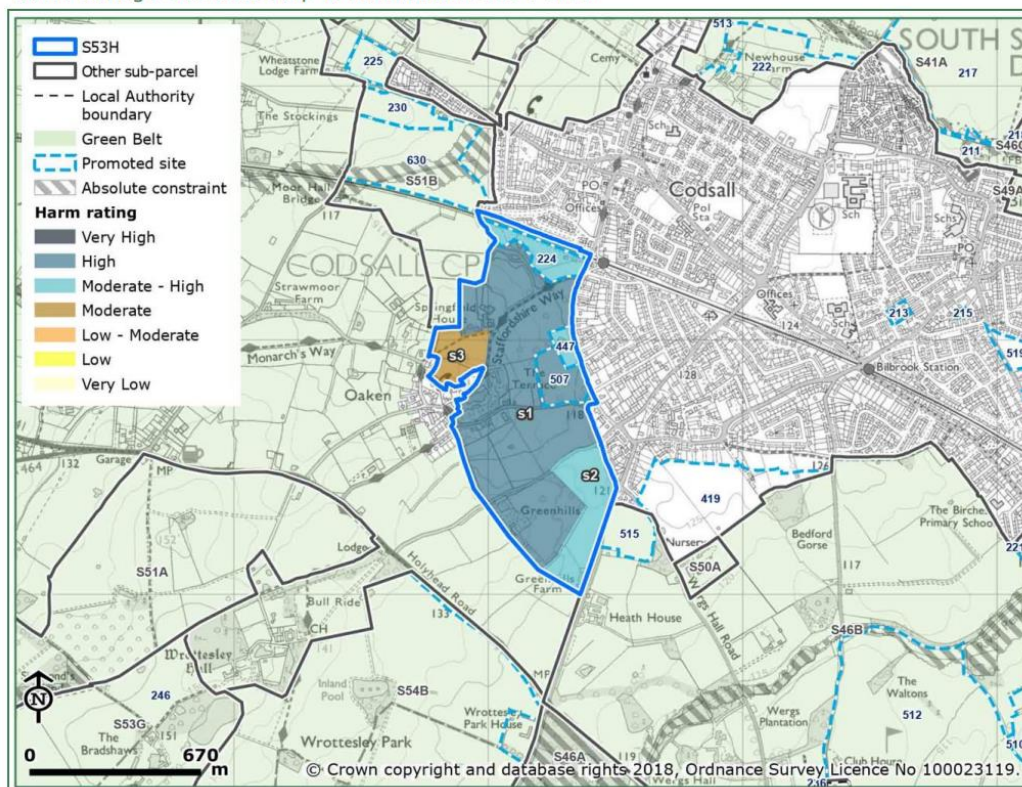


Figure 7.1: Harm Ratings for Land Parcel S53H

7.14 Whilst the conclusions of the above assessment are noted, it remains that Land off Station Road 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

7.15 The harm assessment for Green Belt sub-parcel S53Hs2 indicates that the parcel makes a 'moderate' contribution to preventing the sprawl of the West Midlands conurbation. However, as set out above, paragraph 3.15 of the Green Belt indicates that Codsall/Bilbrook is not considered to form part of the West Midlands conurbation. It is therefore not understood how the Green Belt parcel can make a moderate contribution in preventing its sprawl, particularly when the parcel is located on the western side of Codsall i.e the side furthest away from the conurbation.

7.16 Development of the site would not lead to unrestricted sprawl of the built-up area as the site will remain enclosed along its southern and western boundaries by green infrastructure and its eastern and northern boundaries by the existing settlement edge of Codsall. Furthermore, the site would represent a relatively small-scale addition on the south-western edge of Codsall which would not extend further west or south than the existing settlement pattern, or the existing settlement limit set by properties on Canford Crescent/Fairfield Drive to the north. In addition, due to the significant wooded boundary, the site is visually self-contained.

7.17 It is therefore considered that the parcel makes a 'weak/no' contribution to the checking the unrestricted sprawl of large built-up areas, rather than the 'moderate' contribution identified within the Green Belt Study.

To Prevent Neighbouring Towns from Merging into One Another

7.18 The removal of the site from the Green Belt would amount to a negligible reduction to the separation distances between the built-up area of Codsall/Billbrook and the nearest neighbouring town.

7.19 Richborough Estates therefore agrees with the conclusions of the Green Belt Study, that the site makes a 'weak/no' contribution to preventing neighbouring towns from merging into one another.

To Assist in Safeguarding the Countryside from Encroachment

7.20 Whilst the site contains some characteristics of open countryside, such as an absence of built development, it remains that the site has durable defensible boundaries, particularly to the south-west, that are afforded clear physical enclosure from the wider Green Belt. Furthermore, due to the existing uses that surround the site, its development would prevent further encroachment into the countryside.

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 The site lies outside of Codsall Conservation area and, whilst it is located within the Conservation Area 'buffer zone', the existing vegetation along Oaken Drive and Oaken Lane serves to limit the visual relationship between the site and the Conservation Area. The character of the site is one of an 'ordinary' agricultural field enclosure defined by mature vegetation, an exposed railway embankment and consisting in part of built form: this is in contrast to the 'parkland' character of the Conservation Area. As such the removal of the site from the Green Belt would not affect the purpose of preserving the setting and special character of a historic town.

7.23 Richborough Estates therefore 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

7.24 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. The release of the site from the Green Belt and allocation for residential development would therefore not significantly prevent the recycling of derelict land and other urban land.

7.25 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

7.26 Overall, it is therefore considered that Land off Station Road, Codsall, 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: S53Hs2. This contribution is summarised in the table below:

GB Purpose	Previous Rating	Revised Rating
P1: Checking the unrestricted sprawl of large built-up areas	Moderate	Weak / No contribution
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 Station Road, Green Belt Assessment

Green Belt Harm

7.27 Given the reduced impact upon the five purposes of the Green Belt set out above, it is contented that the Green Belt harm identified within the Study should be reduced from 'moderate-high to 'low-moderate'.

7.28 It is the view of Richborough Estates that the site makes a weak/no contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. The site would form a logical location for the expansion of the settlement edge, with the existing site boundaries representing strong defensible boundaries for the Green Belt edge in the future.

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

Landscape Sensitivity

7.30 South Staffordshire District Council has produced a Landscape Study (2019) which forms part of the Local Plan Review evidence base. Land off Station Road falls with Landscape Parcel Reference: SL36S1. These two landscape parcels subsequently fall within the 'Ancient Clay Farmlands' Landscape Character Type. The area is located north west of Wolverhampton, on the western outskirts of Codsall and extends to the village of Oaken.

7.31 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 to the north of the railway are larger in scale.	Generally small pastoral fields well defined by hedgerows, with frequent mature field and hedgerow trees which increase the sense of intimacy.
Landform		Landform to the north of the railway line is more gently undulating.	Sloping landform which rises sharply from the edge of Codsall at 115m AOD, to the village of Oaken at 140m AOD.
Landscape pattern and time depth			The landscape south of the railway line is characterised by 19th century parkland associated with country houses built for local industrialists and small pastoral fields (identified as post-1880s replanned enclosure). Larger 18th/19th century planned enclosure are found north of the railway line and a small area of irregular post-

			medieval enclosure either side of Wood Lane. The landscape pattern has remained largely unchanged from the 1880s edition OS, resulting in strong time depth.
'Natural' character		Areas of semi-natural habitats include Priority Habitat deciduous woodland on the edge of Oaken and along stream corridors. Valued natural features include the predominance of mature parkland trees, intact hedgerows and hedgerow trees.	
Built character	Two overhead electricity routes cut through the north western corner and the railway line runs east-west through the centre of the area.	Built features within the landscape area include residential properties on the settlement edge of Oaken and Codsall and a few farms.	The parkland landscape to the south of the railway line within the Codsall Billbrook and Oaken Conservation Area is associated with two unlisted 19th century country houses, The Terrace at Oaken and Springfield House.
Recreational character	The north of the area is not publicly accessible.		The parkland to the south has open access and is crossed by the Staffordshire Way Long Distance Recreational Route.
Perceptual aspects	Two overhead electricity routes introduce an urbanising element, whilst noise from passing trains may also detract from the perceptual qualities of the area.		The area has a strong rural character, extending from the parkland to the south to the working agricultural landscape to the north.
Settlement setting		Although ribbon development along Wood Road and Moatbrook Lane present a weaker edge to the settlement, strong hedgerows and	The area provides a rural setting for Codstall and Oaken, particularly within the Codsall Billbrook and Oaken Conservation Area,

		woodland belts along these roads and around Moatbrook Playing Fields provide a strong barrier feature.	which provides an important rural gap between the two settlements.
Visual prominence			The slopes surrounding Oaken are visually prominent within the local landscape.
Inter-visibility with adjacent designated landscapes or promoted view points	There is no inter-visibility with adjacent sensitive landscapes or marked viewpoints.		
Landscape Sensitivity Judgement (SL36 S1)	The landscape area has an overall high sensitivity to residential development due to its small scale, time depth, recreational value and visual prominence.		High

7.32 The Study concludes that Landscape Parcel SL36S1 (which encompasses Land at Station Road) is considered to have a 'high overall sensitivity to residential development, as identified on Figure 7.2 below.

Landscape Sensitivity Rating

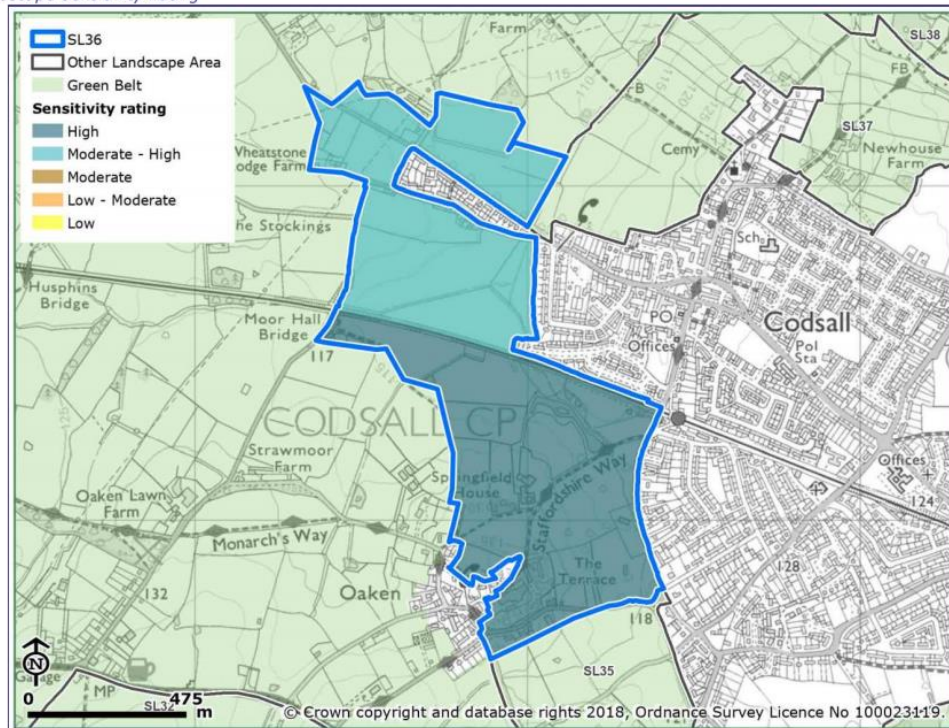


Figure 7.3: Landscape Sensitivity Rating Parcel SL36

- 7.33 The findings of the Landscape Study for the wider parcel are not necessarily disputed by Richborough Estates. However, it remains that land off Station Road performs significantly better in landscape terms, principally due to the presence of mature vegetation including hedgerows, hedgerow trees, parkland trees and woodland, which block views from the west and south of the site. This existing vegetation will help to minimise the visual envelope of the site and will contribute to the capacity of the site to accommodate development.
- 7.34 Furthermore, the physical and visual relationship of the site to the existing urban edge of Codsall, in conjunction with the presence of features such as the railway line to the north detract from the overall landscape sensitivity of the site.
- 7.35 The landform of the site is relatively uniform which will reduce the potential for extensive earthworks during development, whilst existing water bodies and drainage ditches provide opportunities for wetland planting, recreation and habitat enhancement.
- 7.36 The Illustrative Masterplan for the site (see **Appendix 2**) offers a significant opportunity to enhance the landscape fabric and character of the site through the retention of the existing trees and hedgerows and the creation of new public open space.

Sustainability

- 7.37 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.
- 7.38 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.

7.39 Codsall is identified as falling within ‘Tier 1 Settlements’ which are described as:

“These settlements typically have food stores, a wider range of services and facilities than other villages, a range of education establishments, access to a train station and good access to employment and wider facilities outside the village via public transport.”

7.40 The overall settlement hierarchy scoring for Codsall is presented below.

Access to convenience stores/ supermarkets	
Diversity of other accessible community facilities/ services	
Retail Centres Study	
Access to employment locations	
Access to primary/ first school within settlement	
Access to secondary/ high school within settlement	
Access to 6th form/college within settlement	
Public transport access to higher order services outside of the village	

Table 7.3: Settlement Hierarchy Scoring for Codsall, RSFA (2021)

7.41 Richborough Estates supports the findings of the RSFA in relation to Codsall.

- 7.42 The site is located immediately adjacent to Codsall Railway Station, which provides regular rail services between Birmingham and Shrewsbury. The site also provides a unique opportunity to provide a dedicated car park to serve the railway station. Due to the location of the site in relation to the railway station, no other site would be able to deliver this benefit.
- 7.43 The site is therefore sustainably located.

Impact on the Historic Environment

- 7.44 Richborough Estates commissioned RPS to prepare a heritage report, which assesses the built heritage implications of development of the site through a review of the identified built heritage assets and consideration of the impact of the scheme on the significance of the built heritage assets.
- 7.45 The report concludes that the development of the site will have no direct impacts on built heritage assets and no impacts on the settings of the identified assets. The sites location within a Conservation buffer zone instead provides the opportunity to both preserve and enhance the character and the appearance of the Conservation Area through sensitive design.
- 7.46 The provision of a station car park within the new development will enhance the setting of Codsall station and the southern extremity of the Codsall Conservation Area through the removal of parked cars from the station approach off Station Road.
- 7.47 In summary, the technical work undertaken to date concludes there are therefore no heritage constraints to the allocation of the site for residential development.

Surface Water Flooding

- 7.48 Richborough Estates has previously undertaken technical work and a

modelling exercise in respect of flooding and the Moat Brook.

- 7.49 In summary the modelling exercise demonstrates the flooding extent on the site is reduced from that shown on the EA surface water flood map, although it is recognised that mitigation measures will be required to accommodate built form in certain areas. The report goes on to propose two potential mitigation options utilising either land raising and creation of flood corridor within the site, or realignment of the existing ditch to the northern boundary of the site. Both options, following modelling, have been demonstrated to be able to mitigate flood risk to the 1 in 1000-year standard.

Highways (Accessibility to the Site)

- 7.50 The site has previously been assessed by Staffordshire County Council through the local plan process, who concluded that highways accessibility is 'acceptable in principle subject to significant highway improvements.'
- 7.51 Technical work, has informed the Illustrative Masterplan for the site, with the proposed access arrangement for the site being achieved through a fourth arm of the mini-roundabout junction at Station Road/Chapel Lane/Oaken Lanes. The existing mini-roundabout would need to be enlarged to accommodate the additional arm, however, this is not considered to be significant.
- 7.52 Work has also been undertaken in relation to traffic generation, distribution and assignment and has been assessed using the TRICS 7.3.4 database. The forecast level of traffic associated with the development is considered to be minimal and the impact of development traffic is considered to be negligible. It is clear from site observations that the proposed junction arrangement can easily deal with the predicted level of traffic from the development proposal.
- 7.53 It is considered that the access arrangements for land at Station Road would represent fairly minor works and the site is therefore suitable from a highways perspective.

Impact on Current Land Use

- 7.54 The site comprises Grade 4 agricultural land and is therefore not best and most versatile land. The loss of this land for development is therefore considered to be acceptable.

Impact on Natural Environment

- 7.55 A range of ecological assessments have been undertaken and a Tree Survey prepared to inform the Illustrative Masterplan. The Tree Report has recommended the removal of low grade trees to allow for the construction of an access to the site, which would not impinge on the viability of the remaining higher-grade trees on site.

Impact on Environmental Quality

- 7.56 Whilst it is accepted that development is unlikely to improve the environmental quality of the site as there are no existing issues of contaminated land, development would also not give rise to any environmental quality issues.
- 7.57 It is recognised that the site is adjacent to an existing railway line and a noise report has been undertaken to consider amenity issues. This report demonstrates that suitable mitigation can be achieved. The report concludes that BS 8233 requirements within dwellings can be achieved by use of appropriate acoustic rated windows and vents.

Site-Specific Opportunities

- 7.58 As set out previously within this Representation, the development of the site for residential purposes presents the opportunity to deliver a new car park to serve Codsall Railway Station, which is identified within the Council's Infrastructure Delivery Plan as a future project.

- 7.59 This represents a significant benefit of allocating land at Station Road, Codsall, for residential development.

Suitability

- 7.60 The information set out above demonstrate that the Station Road site is a suitable site for development.
- 7.61 It is clear that the site has a low impact on the Green Belt purposes and that many of the potential impacts of development can be suitably mitigated.
- 7.62 The site represents a unique opportunity within Codsall to provide not only additional housing, but wider community benefits that cannot be delivered elsewhere, such as the proposed station car park, which will improve the sustainability of the wider settlement and provide opportunities to enhance the setting of Codsall station.

Deliverability

- 7.63 The site is within single land ownership and there is an agreement in place between the landowner and Richborough Estates to facilitate the development of the site.
- 7.64 A considerable amount of technical work has been undertaken to consider deliverability of this site. Richborough Estates can confirm that this work demonstrates that there are no constraints likely to render the site undeliverable in the plan period. The site is available now.
- 7.65 There are no existing uses that would require relocation and no issues of contamination that would require remediation. The impacts of development can be mitigated and, in many cases, a positive outcome can be achieved.
- 7.66 The site is deliverable and immediately available and, subject to allocation,

could deliver homes and a new station car park within the next 5 years.

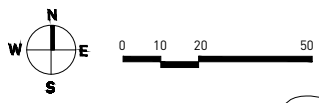
Illustrative Layout

- 5.32 An Illustrative Masterplan is provided at **Appendix 2** to provide an indication of how the site could be developed, taking into consideration the site's opportunities and constraints. The illustrative scheme incorporates the provision of a dedicated car park to serve Codsall railway station.

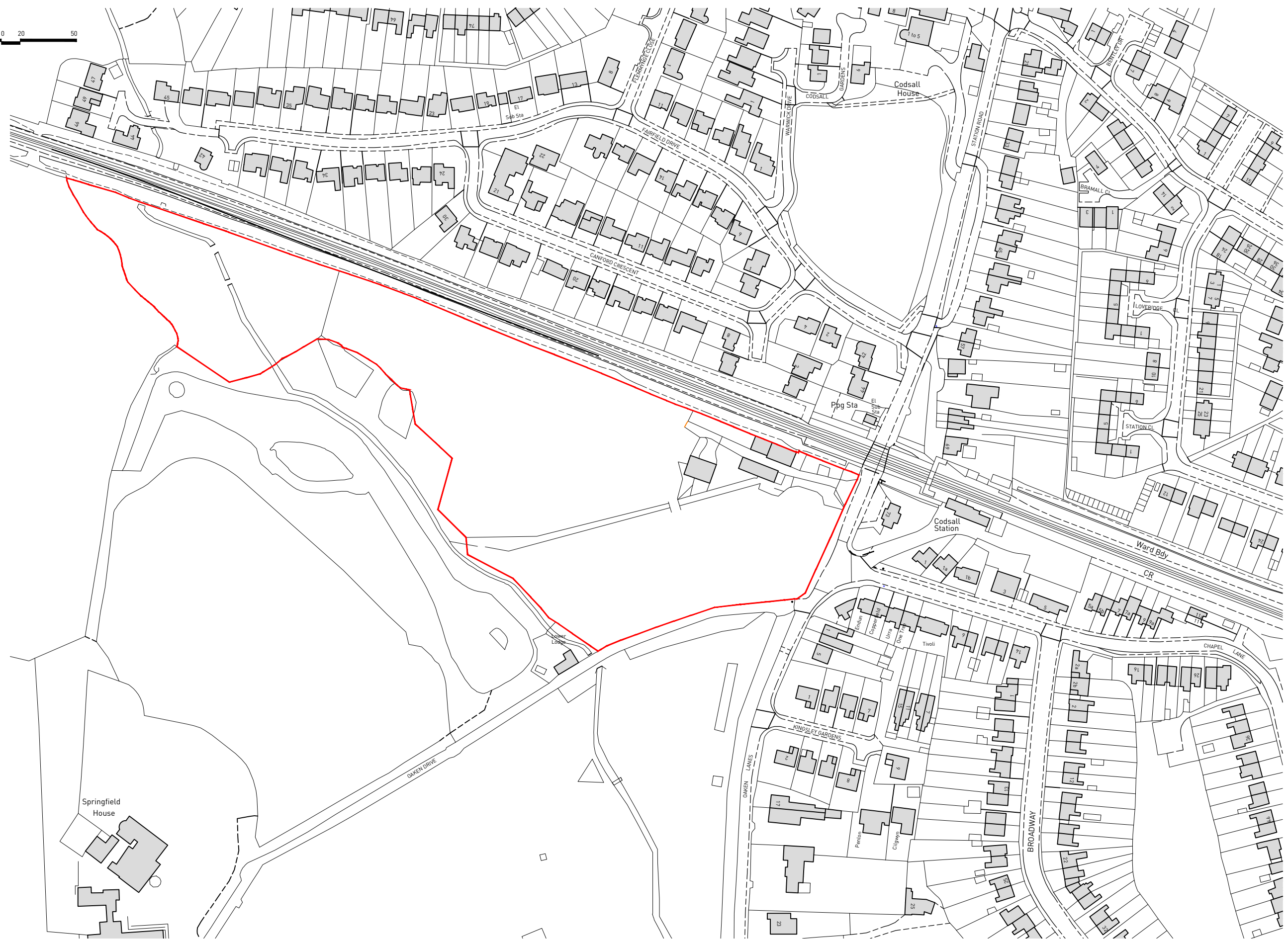
8.0 Conclusion


- 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 Station Road, Codsall, 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 Station Road, Codsall, as an allocation.
- 8.3 The information contained within this representation, read in conjunction with the appended illustrative masterplan, demonstrates that land off Station 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



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KEY
 Site location
8.44 Ac/
3.42 Ha

LAND OFF STATION ROAD, CODSALL SITE LOCATION PLAN



APPENDIX 2



- 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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DRAFT
12/12/19

REV	DESCRIPTION	DRN	CHD	DATE	
<input type="checkbox"/>	PRELIMINARY	<input type="checkbox"/>	INFORMATION	<input type="checkbox"/>	TENDER
<input type="checkbox"/>	CONSTRUCTION	<input type="checkbox"/>	AS BUILT		

SCALE 1:500 @ A1 DATE DEC 2019

DRAWN GS/JPG CHK CM

DRAWING NO. 18417/1005 REV -

TITLE Land off Station Road
Codsall

DETAILS Coloured Sketch Layout

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