

# **SOUTH STAFFORDSHIRE LOCAL PLAN PREFERRED OPTIONS NOVEMBER 2021**

## **LAND OFF STRAWMOOR LANE, CODSALL**

**REPRESENTATION PREPARED ON BEHALF OF  
RICHBOROUGH ESTATES**



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



## **Pegasus Group**

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## **APPENDICES:**

**Appendix 1: Promotional Document**

## **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 Strawmoor Lane, Codsall, which Richborough Estates is promoting for residential 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

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Levy (Dixon Searle Partnership) October 2021.

1.4 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:

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

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

## **2.0 What Does the Local Plan Need to Consider?**

- 2.1 Richborough Estates supports South Staffordshire District Council ('SSDC') in progressing with a review of the adopted South Staffordshire District Development Plan as required by Policy SAD1 of the Site Allocations Document ('SAD') 2018. This provides the opportunity for the SSDC to comprehensively review the adopted Development Plan, including not only its own objectively assessed housing need, but also the role of the District in meeting unmet cross boundary needs from the wider Greater Birmingham Housing Market Area ('GBHMA'), including from the Black Country.

### **National Requirements for Plan-Making**

- 2.2 Paragraph 33 of the National Planning Policy Framework 2021 ('NPPF') requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years.
- 2.3 Paragraph 24 of the NPPF also confirms that local planning authorities "*...are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.*" In the context of South Staffordshire, strategic matters can include housing, employment, infrastructure and the Green Belt.
- 2.4 Richborough Estates supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists with the District to guide growth to 2038 and to ensure that development is genuinely plan-led.

### **Evidence Base**

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

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

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

development.

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

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

## Infrastructure Delivery Plan

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

### **Question 2:**

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

**Yes/No**

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

**Yes/No**

- 2.13 Richborough Estates supports SSDC's proposed infrastructure-led strategy which seeks to focus development towards larger settlements supplemented with some smaller settlement sites and, where appropriate, deliver new infrastructure benefits.
- 2.14 Development of Land off Strawmoor Lane, Codsall, can facilitate significant infrastructure provision, including the following infrastructure opportunities identified within the IDP:
- 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 the District Council, 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 off Strawmoor Lane.

## **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)<sup>1</sup>.
- 3.9 Nonetheless, Planning Practice Guidance ('PPG') is clear that the figure

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<sup>1</sup> 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 *requirement*<sup>2</sup>.

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 authorities<sup>3</sup>.

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.

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<sup>2</sup> Paragraph: 002 Reference ID: 2a-002-20190220

<sup>3</sup> 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 Study<sup>4</sup> ('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.

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<sup>4</sup> Greater Birmingham HMA Strategic Growth Study (GL Hearn) 2018

This may require an uplift in local housing needs identified.

### **Spatial Strategy**

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

### **Longer Term Growth Aspirations for a New Settlement**

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

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

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- 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 Strawmoor Lane, 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 However, Richborough Estates believes that Land off Strawmoor Lane, Codsall, should also be included within Policy SA5 and allocated for



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development through the LPR, the justification for which is set out within 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 Study<sup>5</sup> 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:

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<sup>5</sup> 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.

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### **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.

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### **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.

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**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 CO<sub>2</sub> when compared to current standards. Further changes are due in 2025 that will mean a 75% reduction in CO<sub>2</sub> when compared to today, along with a new focus on rating primary energy efficiency as well as CO<sub>2</sub>.

## 6.0 Sustainability Appraisal

6.1 The LPR Consultation is supported by a Sustainability Appraisal, prepared by Lepus Consulting<sup>6</sup> ('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

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<sup>6</sup> 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"> <li>• Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance;</li> <li>• Cause a very high-quality receptor to be permanently diminished;</li> <li>• Be unable to be entirely mitigated;</li> <li>• Be discordant with the existing setting; and/or</li> <li>• Contribute to a cumulative significant effect.</li> </ul>
Minor Negative -	The size, nature and location of development proposals would be likely to: <ul style="list-style-type: none"> <li>• Not quite fit into the existing location or with existing receptor qualities; and/or</li> <li>• Affect undesignated yet recognised local receptors.</li> </ul>
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"> <li>• Improve undesignated yet recognised receptor qualities at the local scale;</li> <li>• Fit into, or with, the existing location and existing receptor qualities; and/or</li> <li>• Enable the restoration of valued characteristic features.</li> </ul>
Major Positive ++	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> <li>• Enhance and redefine the location in a positive manner, making a contribution at a national or international scale;</li> <li>• Restore valued receptors which were degraded through previous uses; and/or</li> <li>• Improve one or more key</li> </ul>

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

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

**Land off Wood Road/Slate Lane and Land off Moatbrook Lane Part B – Site Refs: 630a and 630b**

6.5 Land at Strawmoor Lane is considered within the SA as two separate land parcels, referred to as Land off Wood Road/Slate Lane (Site Ref: 630a) and Land off Moatbrook Lane Part B – Site Ref: 630b. 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
630a	+/-	+	+/-	--	0	-	+	-	-	-	--	-
630b	+/-	--	+/-	--	-	-	+	-	-	-	--	-

**Figure 6.1: Significance of effects pre-mitigation, Site Refs: 630a and 630b**



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
630a	+/-	+	+/-	--	0	-	+	-	0	-	--	-
630b	+/-	0	+/-	--	-	-	+	-	0	-	--	-

**Figure 6.2: Significance of effects post-mitigation, Site Refs: 630a and 630b**

- 6.6 Richborough Estates disputes elements of the above scoring, particularly the finding that developing the Site would result in a Major Negative impact upon Landscape and Townscape.
- 6.7 The SA sets out that site is considered to result in a '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 LPR<sup>7</sup>. Parcels 630a and 630b are also found as being of 'moderate-high' landscape sensitivity.
- 6.8 Similarly, both sites are identified as having 'minor negative' impacts in relation to views from the public right of way network, views for local residents, urbanisation of the countryside and coalescence.
- 6.9 Given that neither the Green Belt harm or sensitivity identified within the Study are not the 'maximum' level that might be found, and given all other aspects of landscape are considered to be 'Minor Negative', it is not understood how the SA considers the overall harm of both sites translates into a 'Major Negative' impact upon Landscape and Townscape. Not only is this considered inaccurate regarding the summary of Green Belt impact, it also implies that the consideration of Green Belt impact carries significantly greater weight than other landscape considerations in the overall assessment of impact upon Landscape and Townscape.

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

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- 6.10 It is contended that the SA impact score should duly be tempered to a Minor Negative ('-') score for both sites.
- 6.11 Richborough Estates also disputes the Negligible ('0') post-mitigation score attributed to parcel 630b regarding Climate Change Adaptation, which includes considerations surrounding flood risk. The SA indicates that this parcel could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate pluvial flood risk in surrounding locations, resulting in a major negative impact on pluvial flood risk. Conversely, it is the position of Richborough Estates that development on the parts of the site which fall within Flood Zone 1 represent an opportunity to design and provide a suitable surface water drainage scheme which stores rainfall at an improved rate when compared against the existing 'greenfield' position. This would accordingly be a benefit of the development and should accrue a Minor Positive ('+') score, as is attributed to site 630a.

## **7.0 Land off Strawmoor Lane, Codsall**

### **Site Description**

- 7.1 Richborough Estates has current land interests in land at Strawmoor Lane, Codsall, as shown on within the Promotional Document appended to this representation (see **Appendix 1**).
- 7.2 The site comprises approximately 19 hectares of land, made up of four field parcels, located either side of Moatbrook Lane and to the east of Strawmoor Lane. This land represents a logical and sustainable extension to the existing Category 1 settlement of Codsall and has the capacity to deliver approximately 200-250 dwellings and supporting infrastructure.
- 7.3 The majority of the site is located within Flood Zone 1 (land having less than 1 in 1,000 probability of annual flooding). However, the Moat Brook runs through the southern section of the site, resulting in some of the site being classified as falling within Flood Zone 2 (land having between a 1 in 100 and 1 in 1,000 probability of annual flooding) and Flood Zone 3 (land having greater than 1 in 100 probability of annual flooding). The proposed development area does not encroach on areas at risk of flooding.
- 7.4 The site is located within the West Midlands Green Belt, but immediately adjacent to the built-up area of Codsall.
- 7.5 Natural England's Land Classification Map for the West Midlands Region (ALC004) shows that the site comprises a mix of undefined Grade 3 'Good to Moderate' quality agricultural land and Grade 4 'poor' quality agricultural land.
- 7.6 The site has no other environmental or historical designations.

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## **Illustrative Masterplan**

7.7 An illustrative masterplan has been prepared to introduce an initial proposal, providing an indication of how the site could be delivered and function as a natural sustainable, extension to Codsall.

7.8 The Illustrative Masterplan identifies the following key features:

- Approximately 230 dwellings, including a policy compliant level of affordable housing and a mixture of sizes and tenures;
- Provision of approximately 7 hectares of public open space, including proposed attenuation areas;
- Creation of a new road, connecting Wood Road with Moatbrook Lane and Strawmoor Lane;
- Provision of access from Strawmoor Lane which is proposed to be widened;
- Significant provision of Green Infrastructure to include a landscape mitigation strategy and footpath links to the wider open space areas;
- Provision of SuDS through the delivery of new attenuation features; and
- A new enduring Green Belt boundary to the western edge of the site.

## **Green Belt**

7.9 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.

7.10 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**

7.11 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

- 7.12 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.
- 7.13 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.
- 7.14 Richborough Estates agrees with this assessment. Sites which separate Codsall and Billbrook from the West Midlands Conurbation<sup>8</sup> therefore play an important role in their contribution towards Green Belt Purpose 1.

### Land off Strawmoor Lane, Codsall; Contributions to Green Belt Purposes

- 7.15 The Green Belt Study shows Land off Strawmoor Lane, Codsall, as falling within Green Belt Sub-Parcel Ref S51B – *'Northwest 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	Land lies between the West Midlands conurbation and Albrighton. However there is sufficient distance between the two for each	Moderate

<sup>8</sup> Site Refs: 221, 210 and 503.

towns	town to retain its own distinct landscape setting.	
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

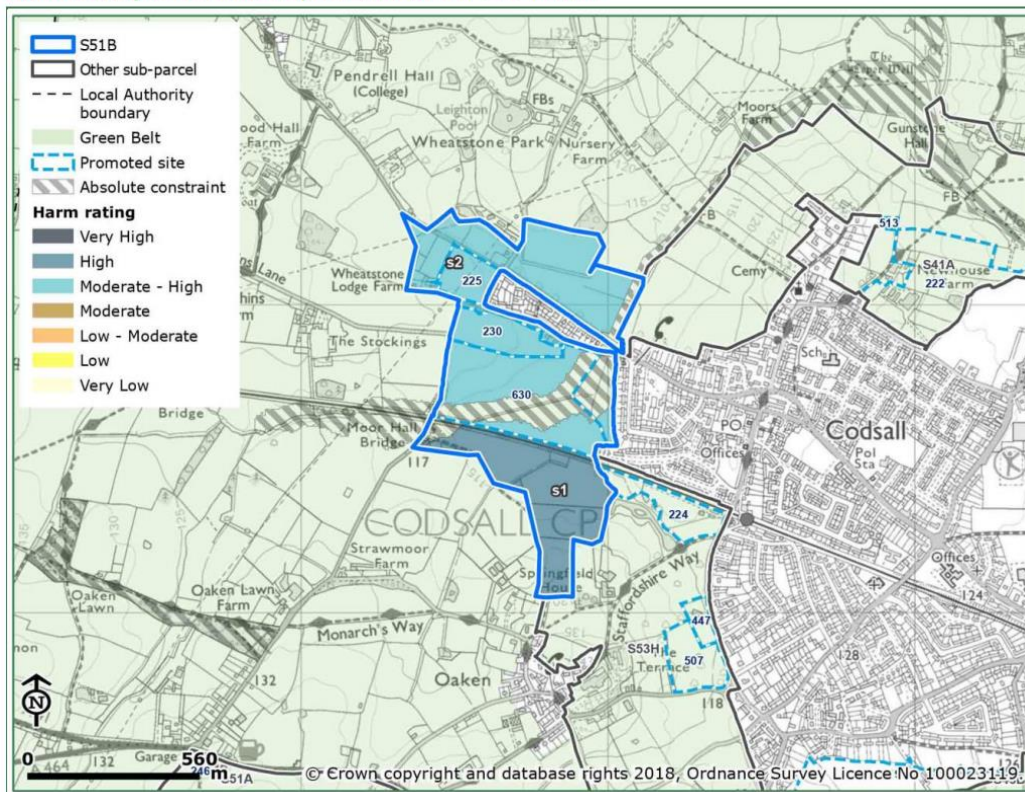
**Table 7.1: Land Parcel S51B Contribution Towards Green Belt Purposes**

7.16 The Study goes on to identify that, should Green Belt Sub-Parcel ref: S51B (within which Land off Strawmoor Lane falls) be released for development, the resulting harm would be 'moderate-high', stating:

*"The sub-parcel makes a strong contribution to preventing encroachment of the countryside and a moderate contribution to checking the sprawl of the West Midlands conurbation and preventing the merger of towns. Land to the north of the railway line and south of Moatbrook Lane has a higher degree of containment by urban edges than land to the south, but the Moat Brook and its associated flood zone and tree cover also create a distinction from the inset area to the east. Strawmoor Lane would form a clear alternative Green Belt boundary to the west but the existing inset edges are also clearly defined, and expansion to the north of Wood Road would constitute a weakening of the existing inset edge. Although the houses between Moatbrook Lane and Wood Road represent some expansion beyond Moat Brook the watercourse still represents some distinction in terms of the relationship between settlement and countryside to the north and*

*west of Bilbrook and Codsall."*

Harm Ratings Overview Map of Land within Sub-Parcel



**Figure 7.1: Harm Ratings for Land Parcel S51B**

7.17 Whilst the conclusions of the above assessment are noted, it remains that Land off Strawmoor Lane 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**

7.18 The harm assessment for Green Belt sub-parcel S51B 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.

7.19 The majority of the site is located to the south of a number of existing dwellings, located between Wood Road and Moatbrook Lane. Furthermore, a number of agricultural buildings exist between Moatbrook Lane and Wood Road, as well as adjacent to Chillington Lane and Slate Lane. The identified site boundary aligns with these existing features and, as such, its development would not result in sprawl away from Codsall. Indeed, the Concept Plan illustrated later within this representation only shows limited development beyond Slate Lane, in line with the existing agricultural buildings at Chillington Lane. Development in this manner would accordingly serve to 'round off' the settlement and not result in the sprawl of Codsall beyond its current extent.

7.20 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**

7.21 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.

7.22 As set out above, the identified site boundary aligns with existing urbanising features to the western edge of Codsall. The site accordingly does not serve a purpose in terms of maintaining separation between Codsall and the nearest neighbouring town. Furthermore, the site's western boundary is currently defined by a mixture of features, including; hedgerow, sporadic trees and Strawmoor Lane. The development of the site for residential purposes accordingly represents an opportunity to strengthen this boundary to provide one which would endure in the long-term.

7.23 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**

- 7.24 By definition, development of any greenfield site beyond the boundary of a settlement results in encroachment into the countryside. Nevertheless, as set out above, the identified site boundaries align with existing residential or agricultural buildings to the western edge of Codsall. There are, therefore, clear urbanising features surrounding the site, reducing the extent to which the site encroaches into the open countryside.
- 7.25 Again, as set out above, the site's western boundary is currently defined by a mixture of features. The development of the site for residential purposes represents an opportunity to strengthen this boundary to provide one which would endure in the long-term, creating a clear transitional arrangement between the urban area and the countryside.
- 7.26 Lastly, the site is currently in private ownership and no public rights of way exist across it. As such, the site does not offer any opportunities for recreation. The Concept Plan illustrated later within this representation includes significant areas of open space, particularly to the south-east of the site, increasing opportunities for recreation and promoting access into the countryside.
- 7.27 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**

- 7.28 There are no listed buildings or other heritage assets within the vicinity of the site. Similarly, Codsall as a settlement has a limited number of listed buildings, located to the centre of the settlement and around St Nicholas C of

E Church. Codsall is accordingly not considered to constitute an 'historic town' in the context of the NPPF. As such, the development of the site for residential purposes would not compromise the setting or special character of an historic town.

7.29 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**

7.30 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.

7.31 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**

7.32 Overall, it is therefore considered that Land off Strawmoor Lane, 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: S51B. This contribution is summarised in the table below:

GB Purpose	Previous Rating	Revised Rating
P1: Checking the unrestricted sprawl of large	Moderate	Weak / No

built-up areas		contribution
P2: Preventing the merging of neighbouring towns	Moderate	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 Strawmoor Lane, Green Belt Assessment**

### Green Belt Harm

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

7.34 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.

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

### Landscape Sensitivity

7.36 South Staffordshire District Council has produced a Landscape Study (2019) which forms part of the Local Plan Review evidence base. Land off Strawmoor Lane falls with Landscape Parcel Reference: SL36S2. 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.

7.37 An extract of the Council’s Appraisal of Landscape Sensitivity is included below:

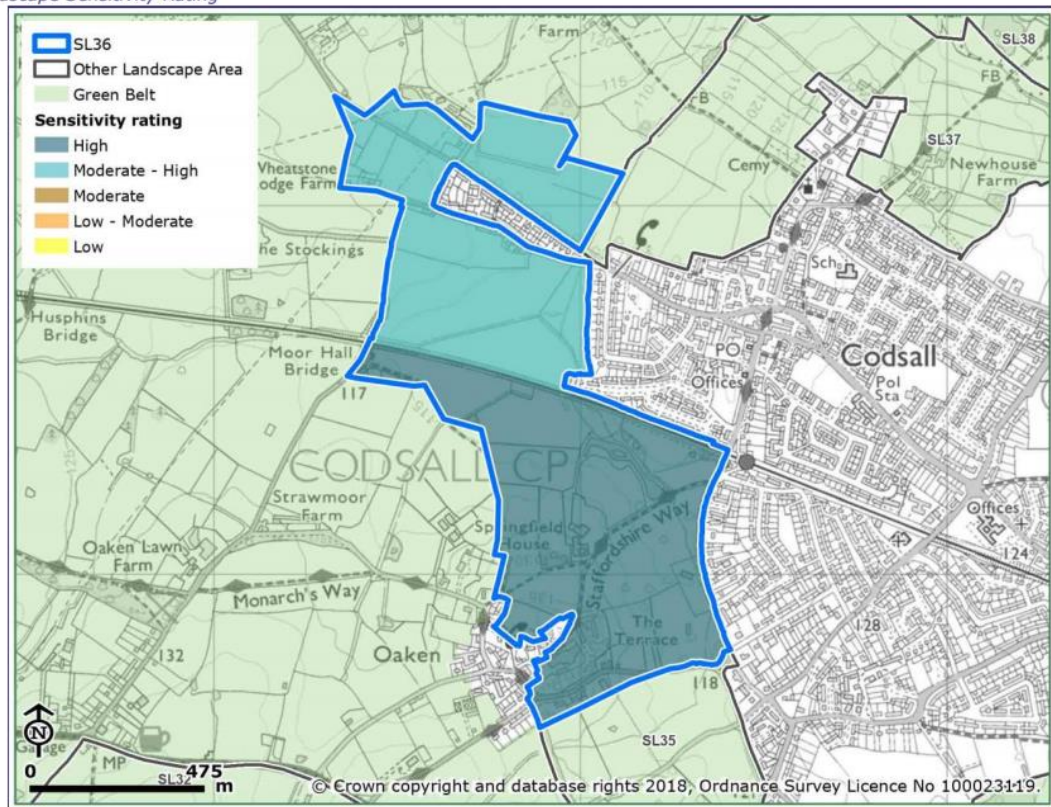
Characteristic / Attribute	Lower Sensitivity to Development	Moderate Sensitivity to Development	Higher Sensitivity to Development
<b>Scale</b>		Fields to the north of the railway are larger in scale.	Generally small pastoral fields well defined by hedgerows, with frequent mature field and hedgerow trees which increase the sense of intimacy.
<b>Landform</b>		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.
<b>Landscape pattern and time depth</b>			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.
<b>'Natural' character</b>		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.	
<b>Built character</b>	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.
<b>Recreational character</b>	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.
<b>Perceptual aspects</b>	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.
<b>Settlement setting</b>		Although ribbon development along Wood Road and Moatbrook Lane present a weaker edge to the settlement, strong hedgerows and woodland belts along these roads and around Moatbrook Playing Fields provide a strong barrier feature.	The area provides a rural setting for Codstall and Oaken, particularly within the Codsall Billbrook and Oaken Conservation Area, which provides an important rural gap between the two settlements.
<b>Visual prominence</b>			The slopes surrounding Oaken are visually prominent within the local landscape.
<b>Inter-visibility with adjacent</b>	There is no inter-visibility with adjacent sensitive landscapes or		

<b>designated landscapes or promoted view points</b>	marked viewpoints.		
<b>Landscape Sensitivity Judgement (SL36 S2)</b>	Areas north of the railway line have moderate-high sensitivity to residential development, as land here is larger in scale, less visually prominent and locally influenced by the intersecting pylon route. However, this is counterbalanced by strong landscape pattern and strongly vegetated settlement edge.	Moderate-High	

7.38 The Study concludes that Landscape Parcel SL36S2 (which encompasses Land at Strawmoor Lane) is considered to have a 'moderate-high' overall sensitivity to residential development, as identified on Figure 8.1 overleaf.

Landscape Sensitivity Rating



**Figure 7.3: Landscape Sensitivity Rating Parcel SL36**

7.39 The findings of the Landscape Study for the wider parcel are not necessarily disputed by Richborough Estates. Nevertheless, the site itself relates

physically and visually to the existing settlement edge of Codsall, in conjunction with the presence of features such as the railway line to the south, which collectively detract from the overall landscape sensitivity of the site.

7.40 Nevertheless, Richborough Estates remains of the view that land off Strawmoor Lane performs better in landscape terms than the wider parcels within Landscape Parcel SL36S2. The site relates physically and visually to the existing settlement edge of Codsall. The proposed development will not result in the addition of uncharacteristic or incongruous features. Views of the site are limited and localised and all feature urban influences, with the railway line and associated vegetation to the south further restricting distant views. These features detract from the overall landscape sensitivity of the site.

7.41 The Illustrative Masterplan contained within the submitted Promotional Document 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**

7.42 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.

7.43 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.

7.44 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."*

7.45 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 7.4: Settlement Hierarchy Scoring for Codsall, RSFA (2021)**

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

### **Impact on the Historic Environment**

7.47 There are no listed buildings or conservation areas located in the immediately vicinity of the site. However, the Codsall and Oaken Conservation Area

'Buffer Zone' is located immediately beyond the southern boundary of the site.

7.48 The Illustrative Layout Plan included as part of this representation demonstrates how, due to flood risk and drainage constraints, development will be located in the northern and central areas of the site. This will result in the provision of an additional buffer adjacent to the Conservation Area Buffer Zone, further preserving the setting of the Conservation Area.

7.49 There are therefore no heritage constraints to the allocation of the site for residential development.

### **Surface Water Flooding**

7.50 The majority of the site is located within Flood Zone 1 (the area at least risk from flooding). A smaller area of the site to the south is located within Flood Zones 2 and 3. These areas are not proposed to be developed and would be retained as public open space. The SuDS proposed for the site would also be located beyond these areas.

7.51 A water course enters the site from the west, flowing eastwards, exiting through the eastern boundary. Anecdotal evidence suggests areas adjacent to this water course are seasonally wet. However, again, development is not proposed in these areas. The development of the site and formalisation of a drainage scheme would also serve to improve the occasional highway flooding that is understood to occur by managing the surface-water run-off in a more sustainable way.

7.52 The topography of the site supports the use of gravity storm drainage, with the site gently falling towards existing water courses. It is anticipated that a pumping station will be required on the site to accommodate foul drainage, the location of which will be determined at planning application stage.

---

### **Highways (Accessibility to the Site)**

- 7.53 It is proposed to extend Strawmoor Lane northwards to serve the northern parcel of land, meeting Wood Lane at a priority junction and providing a more attractive route to Wood Lane for traffic, rather than along Slate Lane, from the development proposal and elsewhere.
- 7.54 The main vehicle access to the main body of the development will be from Strawmoor Lane in the form of a priority junction, with Moatbrook Lane forming a priority crossroads junction with Strawmoor Lane and on through the northern development parcel to Wood Lane. A separate pedestrian access is provided to Moatbrook Lane in the northeast corner of the site. The land required to facilitate the widening and improvements is to both Moatbrook Lane and Strawmoor Lane is fully under the control of Richborough Estates.
- 7.55 The site access points can accommodate a refuse lorry, which is typically the largest vehicle that might be expected to access the site on a weekly basis.
- 7.56 A development of around 230 dwellings would be expected to generate around 120 two-way peak-hour vehicle trips, i.e two trips per minute. The majority of traffic is expected to head north along Strawmoor Lane. The site access strategy can easily accommodate such levels of traffic and the impact of the development traffic is such that it will not be unduly perceptible to existing road users on the wider highway network.

### **Suitability**

- 7.57 The information set out above demonstrate that the Strawmoor Lane site is a suitable site for development.
- 7.58 It is submitted that the site serves a reduced function against the five purposes of the Green Belt and that many of the potential impacts of development can be suitably mitigated.

---

### **Deliverability**

- 7.59 There is an agreement in place between the relevant landowners and Richborough Estates to facilitate the development of the site.
- 7.60 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.
- 7.61 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.
- 7.62 The site is deliverable and immediately available and, subject to allocation, could deliver homes within the next 5 years. The allocation of smaller sites such as Land off Strawmoor Lane will serve to balance SSDC's overall housing land supply.

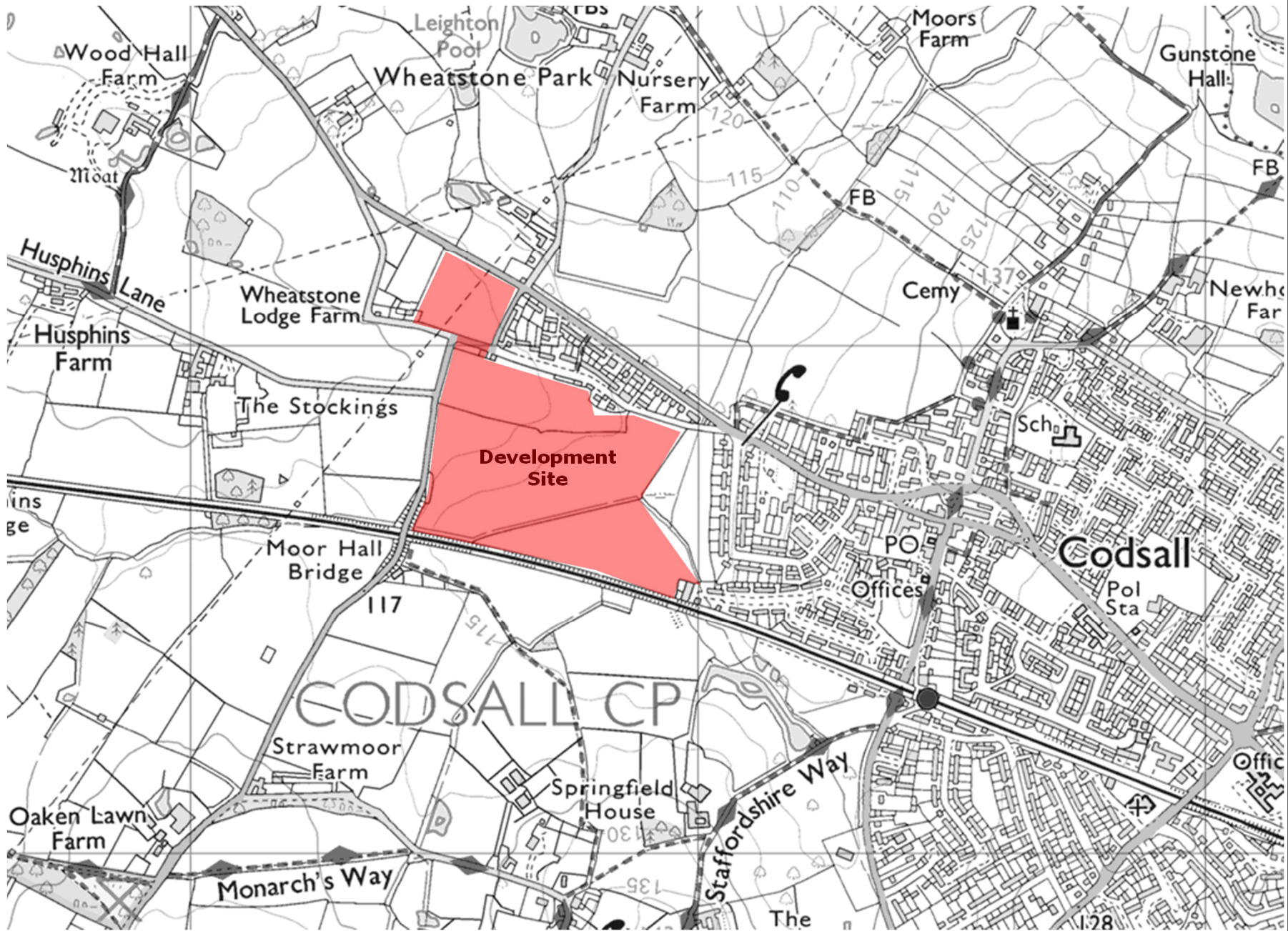
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## **8.0 Conclusion**

- 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 Strawmoor Lane, Codsall, which Richborough Estates is promoting for residential development.
- 8.2 Whilst Richborough Estates is supportive of the LPR overall, the information contained within this representation, read in conjunction with the appended illustrative masterplan, demonstrates that Land at Strawmoor Lane is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 8.3 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



Not to Scale  
 Land off Strawmoor Lane  
 Codsall  
**T18571 - Figure 1.1**  
**Site Location Plan**

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# APPENDIX 2





LAND AT STRAWMOOR LANE  
CODSALL

SITE PROMOTION DOCUMENT

PREPARED ON BEHALF OF RICHBOROUGH ESTATES LTD BY



“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”



# CONTENTS

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- 02 PLANNING POLICY CONTEXT
  - SUMMARY OF PLANNING POLICY AND GUIDANCE
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  - CASE FOR GREEN BELT RELEASE
  - FIVE PURPOSES OF GREEN BELT
- 03 SITE & SURROUNDINGS OVERVIEW
- 04 ENVIRONMENTAL CONSIDERATIONS
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  - FLOOD RISK AND DRAINAGE
  - ECOLOGY
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- 06 SUMMARY AND CONCLUSION



SITE LOCATION PLAN

# 01 INTRODUCTION & DOCUMENT PURPOSE

## INTRODUCTION

- 1.1 The land at Strawmoor Lane represents a logical and appropriate extension to the top tier settlement of Codsall. The site is sustainable, is well located to a wide range of existing services and facilities, and offers an opportunity to deliver new homes alongside supporting community infrastructure.

## RICHBOROUGH ESTATES

- 1.2 Richborough Estates is a responsible and specialist strategic land promotion business founded with the aim of working in partnership with landowners. Our projects are located throughout the country ranging from residential schemes of around 50 dwellings to large urban extensions (including sites within the Green Belt), Retail, Commercial and Extra Care facilities.
- 1.3 Richborough Estates oversees the entire planning process from start to finish and works closely with local communities, Planning Officers and key stakeholders, to create mutually beneficial schemes. Richborough is seeking to apply this approach to the proposed development which is the subject of this Promotional Document.
- 1.4 Richborough Estates has an interest in the land at Strawmoor Lane. The extent of land controlled by Richborough is shown edged red on the Site Location Plan on page 2.

## DOCUMENT PURPOSE

- 1.5 South Staffordshire Council is currently in the process of reviewing their Local Plan to identify and direct growth within the District to 2037. This will include consideration of an appropriate housing requirement and a spatial strategy for distributing growth, informed by an updated settlement hierarchy. This Promotional Document demonstrates that the site at Strawmoor Lane will form a logical extension to Codsall and that exceptional circumstances exist to justify its removal from the Green Belt.
- 1.6 This Promotional Document presents an analysis of the site and its surroundings and sets out in detail the case for the removal of the site from the Green Belt. This includes a review of the current and emerging planning policy position and an assessment of the site against the five purposes of the Green Belt contained in the National Planning Policy Framework ("The Framework").
- 1.7 The document also sets out the Vision for the site, informed by a consideration of the constraints and opportunities and an Indicative Masterplan demonstrating how the Vision can be achieved through a well-designed scheme. The document concludes with a concise summary of the site, the proposed development and its key benefits.

- 1.8 This document has been prepared with input from the following Consultant team:

PLANNING  
Pegasus Group



URBAN DESIGN  
Woods Hardwick Ltd



LANDSCAPE  
Tyler Grange



ECOLOGY  
RammSanderson



ACCESS & MOVEMENT  
Hub Transport Planning



FLOOD RISK AND DRAINAGE  
BWB



HERITAGE  
CgMs




LAND PROMOTER  
Richborough Estates



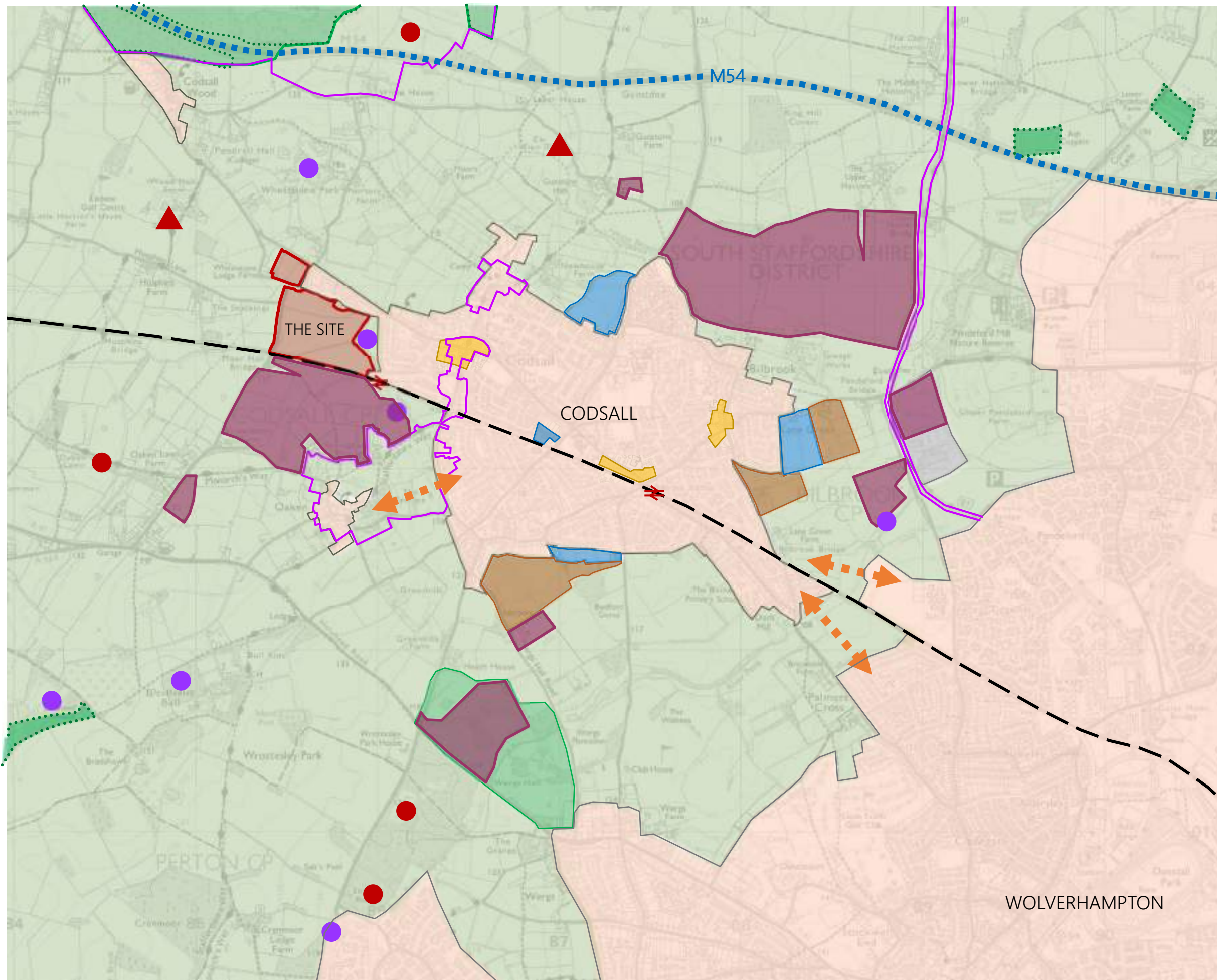


“Planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development”



**02**

PLANNING POLICY  
CONTEXT



- KEY**
- THE SITE
  - BUILT UP AREAS
  - SETTLEMENTS WITHIN CLOSE PROXIMITY OF ONE ANOTHER
  - RAILWAY LINE
  - M54 MOTORWAY
- DEVELOPMENT POLICIES**
- SOUTH STAFFORDSHIRE GREEN BELT
  - CONSERVATION AREA
  - HISTORIC LANDSCAPE AREA
  - ANCIENT WOODLAND
  - SAFEGUARDED LAND
  - HOUSING ALLOCATION SITES
  - VILLAGE/NEIGHBOURHOOD CENTRE
  - EXISTING EMPLOYMENT SITE
  - BIOLOGICAL ALERT SITE
  - SITES OF BIOLOGICAL INTEREST
  - ANCIENT MONUMENTS
- SHELLA 2018**
- SITES CONSIDERED UNSUITABLE FOR DEVELOPMENT

PLAN ILLUSTRATING SITE LOCATION, CONTEXT AND SOUTH STAFFORDSHIRE DEVELOPMENT PLAN DESIGNATIONS



# 02 PLANNING CONTEXT

## INTRODUCTION

2.1 There is an exceptionally strong case to support amendments to the Codsall and Billbrook Green Belt boundary and for releasing the site for residential development.

## PLANNING POLICY CONTEXT

### National Planning Guidance

2.2 In February 2019, the Government published a revised National Planning Policy Framework (“Framework”) which replaces the previous guidance published in 2018 and provides the overarching planning framework for England. Central to the Framework is a presumption in favour of sustainable development which is the golden thread running through both plan-making and decision-taking (paragraph 11). The Framework also seeks to boost the supply of housing and requires local authorities to plan positively for objectively assessed needs and maintain a sufficient supply of housing land.

2.3 Paragraph 136 of the Framework states that once the general extent of a Green Belt has been approved, it should only be altered in ‘exceptional circumstances’ through the plan-making process and that the amended Green Belt boundary should be “capable of enduring beyond the plan period”. There are exceptional circumstances which justify alteration to the Green Belt boundary in South Staffordshire District and the site offers an opportunity to release Green Belt in a sensitive manner, without harming its purposes and functions, as set out in paragraph 134 of the Framework.

2.4 Furthermore, paragraph 8 of the Framework sets out that sustainable development has three overarching objectives: economic, social and environmental. The proposed development accords with each of these objectives, contributing to building a strong, responsive and competitive economy, supporting strong, vibrant and healthy communities and continuing to protect and enhance the natural, built and historic environment.

2.5 Chapter 5 of the NPPF sets out how local authorities should boost significantly the supply of housing in order to deliver sufficient supply of homes. The land at Strawmoor Lane, Codsall, represents a deliverable site that is available, achievable and viable and the provision of housing on the wider site would boost the supply of housing in the District.

### Existing Development Plan

2.6 The Development Plan for South Staffordshire currently comprises:

- Adopted Core Strategy (adopted 11th December 2012)
- Site Allocations Document (SAD) (adopted 11th September 2018)

2.7 The Core Strategy establishes the strategic policies for the District, notably the housing requirement and distribution of housing (Core Policy 1 and Core Policy 6), whilst the Site Allocations Document provides a range of allocations to deliver the requirements set out within the Core Strategy.

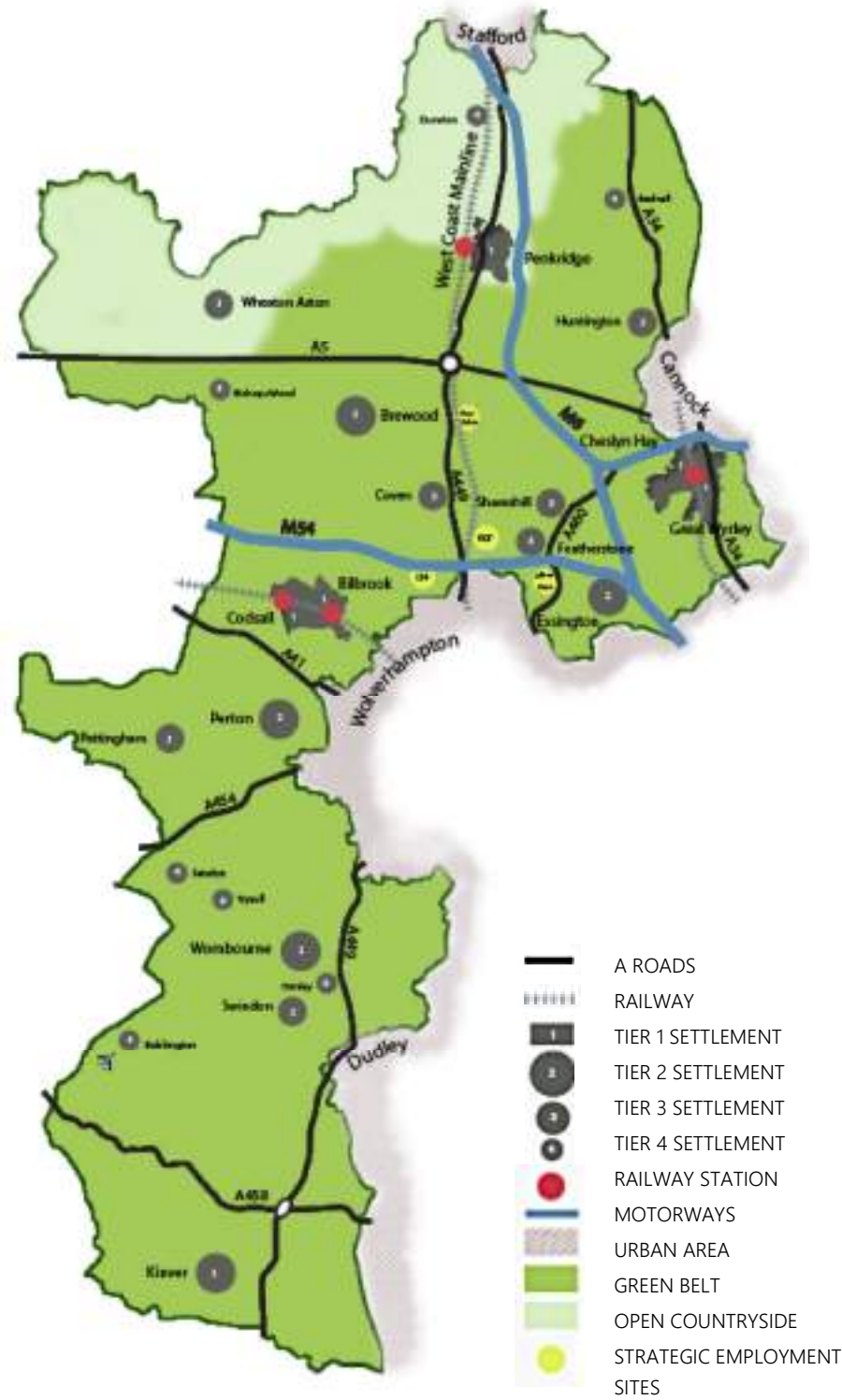
2.8 The policies map identifies the following designation for the site:

- Green Belt (Policy GB1)

2.9 Codsall does not lie within a Neighbourhood Area Designation and therefore a Neighbourhood Plan has not been progressed to date.

### Emerging Local Plan

2.10 South Staffordshire District Council has commenced work on a review of the adopted Local Plan which is essential to respond to unmet housing needs within the District and those confirmed within the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA). The Local Plan Review provides an opportunity for the Council to establish a robust housing requirement, having regard to local housing needs and cross boundary requirements and comprehensively review the vision, strategic objectives, spatial development strategy and policies for shaping detailed development proposals. The review process will also ensure consistency with the new National Planning Policy Framework (NPPF), which seeks a requirement for local planning authorities to keep their Local Plan up to date by undertaking a review at least every five years.



SOUTH STAFFORDSHIRE PLAN SHOWING SETTLEMENT TIRES (FROM *ISSUES AND OPTIONS* OCTOBER 2018)

2.11 The Issues and Options consultation document identifies an objectively assessed housing need of 5,130 dwellings for South Staffordshire District to 2037, utilising the Government’s standard method. In addition, it highlights a range of growth options for contributing towards meeting the housing shortfall within the wider GBBCHMA and commits to testing the delivery of a minimum of 4,000 additional dwellings. This would provide a minimum requirement of 9,130 dwellings between 2018 and 2037; representing a significant uplift compared with past delivery rates experienced within the District.

2.12 The Issues and Options document also identifies a range of spatial distribution options to be tested, including an option to focus development to the District’s larger and better connected villages, such as Codsall. A revised Settlement Hierarchy has informed these options, which highlights Codsall as a “Tier 1” settlement.

2.13 The Tiers are set out in the new *Rural Services and Facilities Audit* (2018), which assessed the sustainability of the district’s settlements relative to one another. This has involved a high level assessment of the services and facilities in each rural settlement, as well as sustainable transport links to higher order services, such as employment, retail centres and hospitals.

2.14 Tier 1 settlements are considered the most sustainable of the District’s villages, with the greatest access to services and facilities. It is concluded that:

*“These settlements typically have food stores, a wider range of 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.”*

2.15 Approximately 80% of South Staffordshire lies within the West Midlands Green Belt. The Council acknowledges that it may be necessary to consider Green Belt boundaries in some locations to accommodate the necessary levels of growth in a sustainable manner. The combined requirements of an increased OAN and the potential for meeting an element of the overspill requirement is likely to increase pressures for Green Belt releases, given the lack of urban capacity and the small proportion of the district that lies outside the current Green Belt designation.

2.16 Codsall is completely constrained by Green Belt, with the exception of an area of Safeguarded Land to the south of the village. In the context set out above it is clear that further release of Green Belt land is required to assist in the delivery of the housing requirement in sustainable locations such as Codsall. In addition, further housing growth within the village will be required in the longer term, beyond the proposed plan period and therefore further safeguarded land should be identified within Codsall to allow for future needs to be met.

## CASE FOR GREEN BELT RELEASE

2.17 Paragraph 136 of the NPPF confirms that:

*“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.”*

2.18 Given the need to accommodate an increased amount of housing and employment land, South Staffordshire District Council concluded there were exceptional circumstances to release land from the Green Belt through the adoption of the Site Allocations Document in September 2018. However, as part of undertaking the Local Plan Review, it remains that there is the need to consider the further release of Green Belt land, partly due to South Staffordshire District Council’s obligations under the Duty-to-Cooperate with neighbouring Black Country authorities. As such, in the context of significant unmet development needs, exceptional circumstances exist to justify further release of Green Belt land.

2.19 The Local Plan Review Issues and Options document confirms that a joint Green Belt review covering both the Black Country and South Staffordshire is currently being prepared. This is anticipated to be published in ‘early 2019’, to inform the Preferred Options version of the Local Plan Review.

2.20 An assessment of Land at Strawmoor Lane against the purposes of the Green Belt (as defined at Paragraph 134 of the NPPF) is included below, to assist the Council with their consideration of the site:

### TO ASSIST IN SAFEGUARDING THE COUNTRYSIDE FROM ENCROACHMENT

2.21 By definition, development of any greenfield site beyond the boundary of a settlement results in encroachment into the countryside. Nevertheless, as set out above, the identified site boundaries align with existing residential or agricultural buildings to the western edge of Codsall. There are therefore clear urbanising features surrounding the site, reducing the extent to which the site encroaches into the open countryside.

2.22 As set out above, the site’s western boundary is currently defined by a mixture of features. The development of the site for residential purposes represents an opportunity to strengthen this boundary to provide one which would endure in the long-term, creating a clear transitional arrangement between the urban area and the countryside.

2.23 Lastly, the site is currently in private ownership and no public rights of way exist across it. As such, the site does not offer any opportunities for recreation. The Concept Plan illustrated later within this Vision Document includes significant areas of open space, particularly to the south-east of the site, increasing opportunities for recreation and promoting access into the countryside.

### TO PRESERVE THE SETTING AND SPECIAL CHARACTER OF HISTORIC TOWNS

2.24 There are no listed buildings or other heritage assets within the vicinity of the site. Similarly, Codsall as a settlement has a limited number of listed buildings, located to the centre of the settlement and around St Nicholas C of E Church. Codsall is accordingly not considered to constitute an ‘historic town’ in the context of the NPPF. As such, the development of the site for residential purposes would not compromise the setting or special character of an historic town.

### TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT AND OTHER URBAN LAND

2.25 Whilst the intention of this purpose is recognised, the Local Plan Review Issues and Options document acknowledges that there is insufficient brownfield land within South Staffordshire (and Codsall) to accommodate identified development needs. As such, the development of the site would not prejudice the redevelopment of derelict or other urban land.



“Planning policies and decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping ”

A landscape photograph showing a large field of tall green grass in the foreground. In the middle ground, there is a row of houses with dark roofs and some trees. The sky is blue with scattered white clouds. A semi-transparent light green rectangular box is overlaid on the right side of the image, containing the text.

# 03

## THE SITE AND ITS SURROUNDING CONTEXT



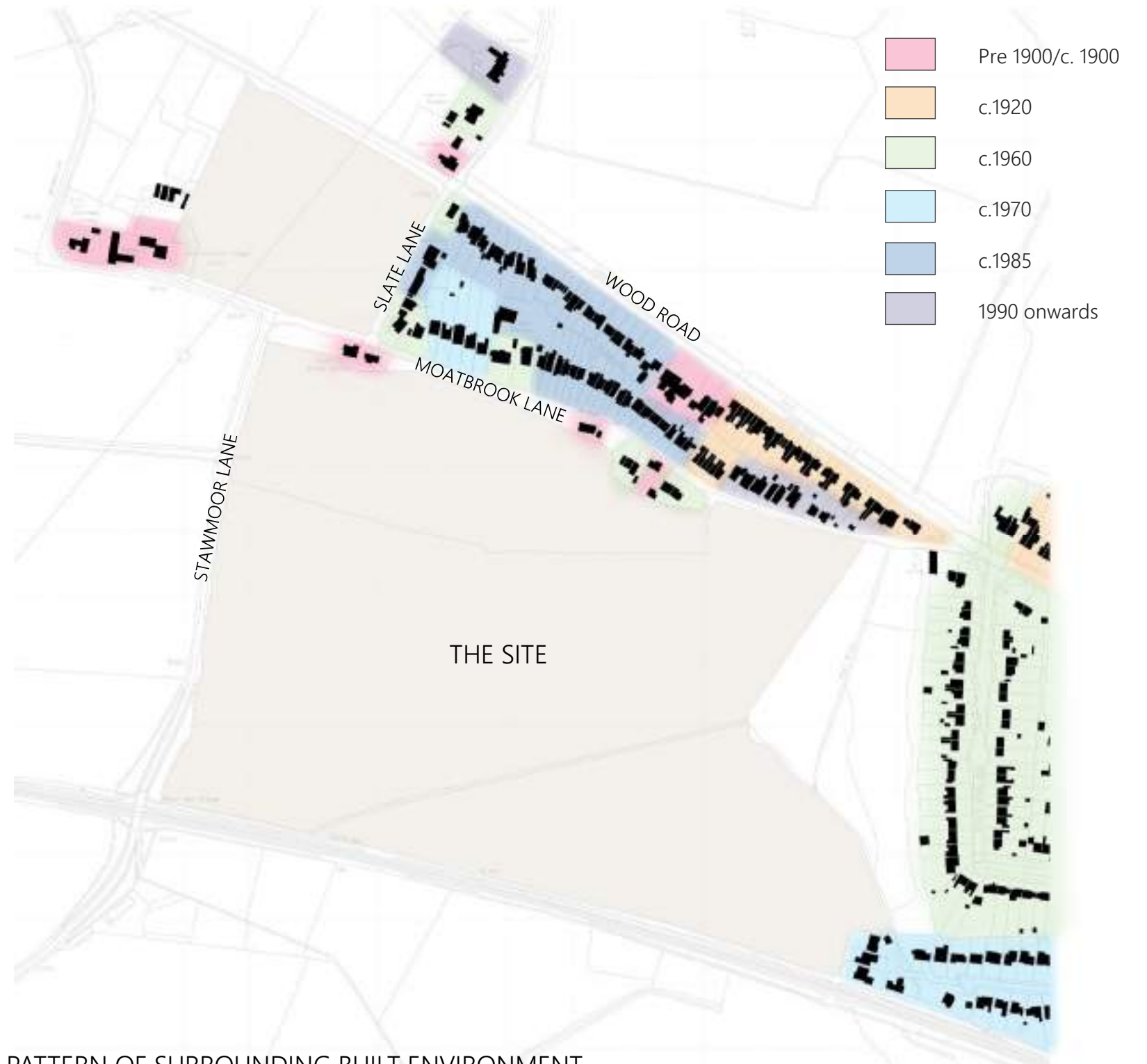
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2



3



PATTERN OF SURROUNDING BUILT ENVIRONMENT

IMAGES

- 1 Post office, shops and café on Station Road
- 2 The Crown Joules pub, Wood Road
- 3 Shopping parade, The Square

# 03 THE SITE AND ITS SURROUNDING CONTEXT

## THE SITE

3.1 Land at Strawmoor Lane adjoins the western edge of the urban area of the settlement, immediately north of the Birmingham to Shrewsbury railway line; to the west and south of a residential area lying between Wood Road; and Moatbrook Lane. The site extends to approximately 17.7 hectares and comprises three pieces of land managed as arable fields and pasture.

3.2 The site is generally flat with the lowest point located within the south of the site.

## SURROUNDING BUILT FORM

3.3 The main development parcel is surrounded by existing dwellings to the north and to the east, while the smaller northern development parcel is bounded by existing residential development to the east, along Slate Lane.

3.4 On the south-side of Moatbrook Lane, adjoining the northern site boundary of the main parcel is a scattering of existing dwellings comprising two pairs of semi-detached houses built c. 1960, (highlighted in green on the image to the left) and several older dwellings dating back to around the turn of the century, including Moatbrook House (highlighted pink).

3.5 The parcel of existing dwellings between Moatbrook Lane and Wood Road has developed gradually over time. This gradual development has resulted in a piecemeal character. Existing dwellings fronting Moatbrook Lane (north side), comprise a mixture of one

and two-storey development, and a mixture of detached, semi-detached and terraced dwellings. Generally, the frontages are landscaped, with varying set-backs.

3.6 The existing development to the east of the main part of the site comprises 1960s and '70s residential development.

3.7 The 1960s development (shaded green) comprises semi-detached two- and single-storey dwellings with front gardens enclosed by low brick walls, hedges and shrubs. Dwellings are constructed in red facing brick with red/brown plain tiles.

3.8 The c.1970s development (shaded blue) comprises detached two-storey dwellings; materials are a mixture of red brick, pale red/buff brick and cream render, with brown pantiles. Set backs are consistent, and gardens are left open, with no boundary treatment. Parking is accommodated on plot.

3.9 The later developments are less compactly built than the existing dwellings along Moatbrook Lane.

## SURROUNDING AREA

3.10 Codsall provides a good range of shops, including supermarket, and community and health care facilities. South Staffordshire Council offices are based in Codsall, and there are both middle and high schools and a leisure centre. Codsall has a frequent bus service to Wolverhampton and has good access to the M54 motorway.

3.11 Codsall is close to significant new high quality job opportunities that continue to be created at i54 and the railway station provides frequent services to Birmingham and Shrewsbury.

3.12 Codsall is well-placed geographically and through good transport links to provide an appropriate location for meeting cross boundary pressures. Direct train links to Birmingham and good links to the M54 and Wolverhampton suggest a strong functional relationship exists between Codsall and the conurbation, where current housing pressures are evidenced.


3.13 Land at Strawmoor Lane, Codsall, is in a sustainable location within close proximity to the village centre and Codsall railway station. The site is very well located to take advantage of local facilities within the centre that are typically used on a day-to-day/weekly basis, such as convenience stores, post office, bank, dining and coffee facilities, surgery, dental practice and a range of schools. All of these services can be reached easily and quickly by foot from the site.

3.14 The site provides an opportunity to deliver much needed housing, together with all necessary supporting infrastructure.

“Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscaping setting, while not preventing or discouraging appropriate innovation or change”

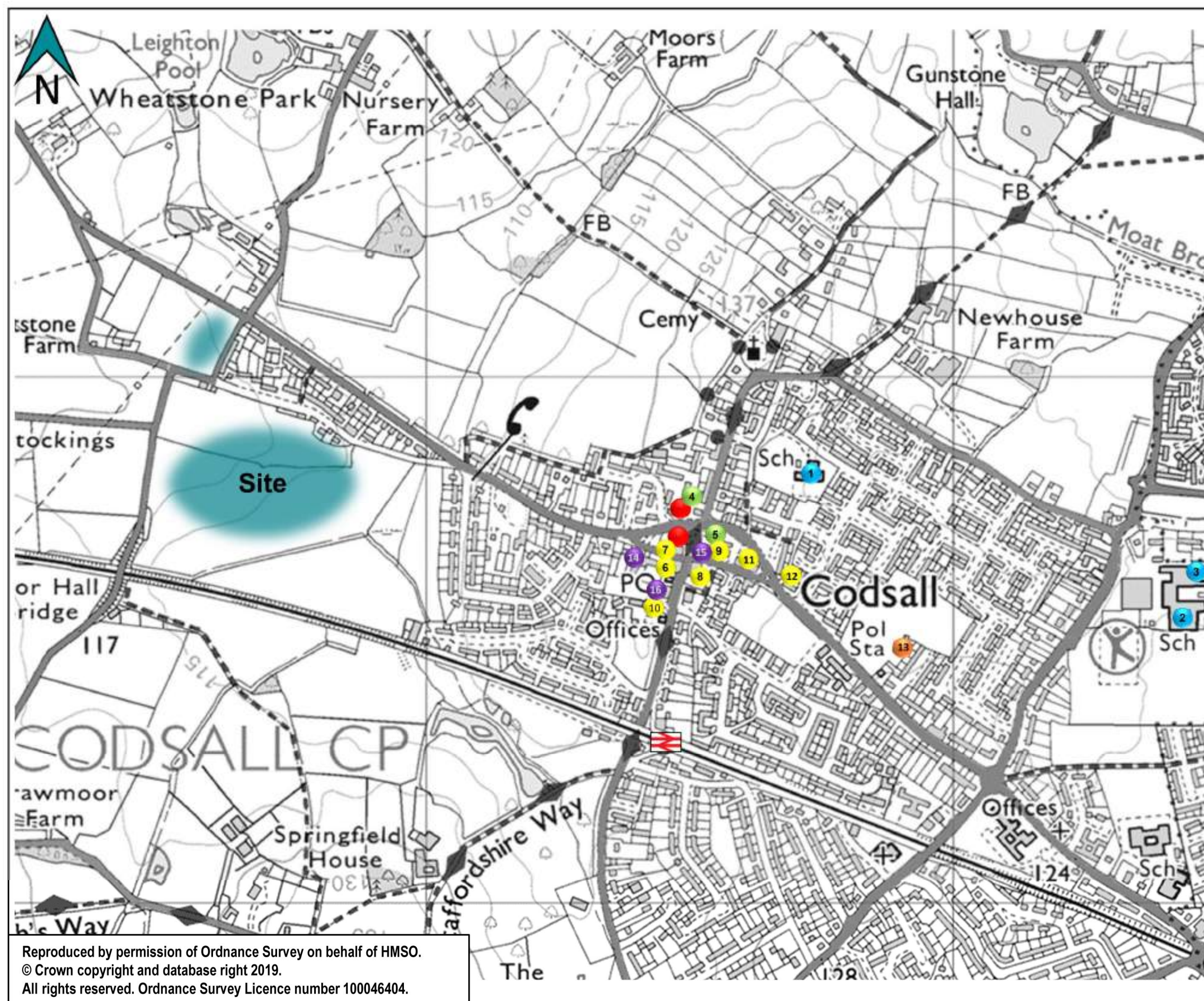






**04**

ENVIRONMENTAL  
CONSIDERATIONS



- Legend**
- Site
  - Bus Stops
  - Rail Station
  - St Nicholas CE (VC) First School
  - Codsall Community High School
  - ABC Early Learning & Childcare Centre
  - Russell House Doctor's Surgery
  - Llyods Pharmacy
  - Zen Spa & Beauty
  - The Crown Joules Public House
  - The Bull Public House
  - Lacey's Bistro
  - Coffee Shop
  - Codsall Fish Bar
  - Urban Hair & Beauty
  - Codsall Village Hal
  - Co-operative Food
  - Nationwide Building Society
  - Post Office

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# 04 ENVIRONMENTAL CONSIDERATIONS

## INTRODUCTION

4.1 This section assesses the relevant environmental considerations at the site. It demonstrates that there are no constraints that prevent the development of the site for a residential-led scheme.

## PROXIMITY TO LOCAL FACILITIES

4.2 The plan opposite indicates the location of the local facilities within Codsall.

4.3 St Nicholas CE First School is located at about a 1.4km walk from the centre of the proposal site with a signalled crossing of Wood Lane/Baker's Way provided *en route* with the final leg of the journey along Church Road. Codsall Middle School and St Christophers Catholic Primary school can be reached further to the east at around a 1.9km walk from the centre of the site. Codsall Community High School is located off Elliotts Lane at about a 2.0km walk; the leisure centre is located alongside the school.

4.4 The post office is located in the centre of Codsall at about an 925m walk from the centre of the site. A number of local restaurants, takeaways, and public houses are located in the centre of Codsall at about an 900m-955m walk from the site.

4.5 Several foodstores are available in the village along with facilities such as pharmacies, banks, and other typical high street shops and services.

4.6 Russell House provides GP facilities off Bakers Way at an approximate 890m walk from the centre of the site and Codsall Dental Practice is located on Bakers Gardens at about a 740m walk.

4.7 Bus service number 5 provides a frequent 7-day service between Wolverhampton and Codsall via Dunstall and Bilbrook (half-hourly or better on weekdays). The service is supplemented further by service 5A that runs mon-Sat on an approximate half-hourly frequency along a slightly different route. Service 10B provides three services in each direction on weekdays between Wolverhampton, Perton and Codsall.

4.8 Codsall railway station provides regular, frequent services between Birmingham New Street and Shrewsbury via Wolverhampton via Wolverhampton and Telford Central amongst other stations.

Amenity	Distance
Co-operative Food	830m
Zen Spa and Beauty	850m
The Crown Joules Public House	860m
Russell House Doctors Surgery	890m
The Bull Public House	900m
Nationwide Building Society	900m
Lacey's Bistro	915m
Lloyds Pharmacy	925m
Post Office	925m
Coffee Shop	955m
Codsall Fish Bar	955m
Urban Hair and Beauty	1.0km
St Nicholas CE (VC) First School	1.4km
Codsall Village Hall	1.4km
Codsall Community High School	2.0km
ABC Early Learning & Childcare Centre	2.1km

## ACCESS AND MOVEMENT

### Local Highway Network

- 4.9 The main body of the proposal land is located on the western side of Codsall; fronting Moatbrook Lane to the north and Strawmoor Lane to the west. A railway line lies to the south of the development with housing lying beyond a treeline to the east. A smaller parcel of proposal land lies to the north of Moatbrook Lane, south of Wood Road, and west of Slate Lane.
- 4.10 The speed limit on Wood Road along the site frontage is 40mph, Slate Lane is subject to a 30mph speed limit, Strawmoor Lane and part of Moatbrook Lane are subject to the national speed limit with the majority of Moatbrook Lane that fronts the site being subject to a 30mph speed limit.
- 4.11 Strawmoor Lane is approx. 5.5m wide and has the nature of a country lane with verges present; no lighting or footways are currently provided. Strawmoor Lane turns first eastwards at Moatbrook Lane and then northwards at right angles to become Slate Lane; Slate Lane is relatively narrow in places at about 3.8m and has housing on its eastern side with frontage access to the lane; the lane is lit but no footways are present.
- 4.12 Wood Road forms part of the route from the site, through Codsall and Bilbrook, and towards the A449 Stafford Road. The route carries only modest traffic levels. Strawmoor Lane and Moatbrook Lane are lightly trafficked routes by any standard.
- 4.13 Staffordshire County Council (SCC) have been consulted through the official pre-application process to discuss the proposed access strategy and potential highway impacts of the proposed development site. Positive feedback has been received from SCC with regard to the access proposals. Furthermore, the potential scope of the Transport Assessment which would support any subsequent planning application has been agreed.

### IMAGES

- 1 View south along Stawmoor Lane
- 2 View south-east along Wood Road
- 3 View south along Slate Lane
- 4 Moatbrook Lane/Strawmoor Lane junction
- 5 Slate Lane/Moatbrook Lane junction
- 6 Wood Road/Slate Lane junction





4



5



6

### Policy Considerations

4.13 The Staffordshire LTP 2011 covers the plan period 2011-2026 and has among its stated aims:

- Enabling economic growth without causing congestion
- Providing opportunities for residents and visitors to access jobs, training and education
- Keeping the highway safe and serviceable whilst achieving value for money
- Improving on our excellent safety record
- Encouraging and providing for active travel

4.14 Policies 5.1 and 5.2 of the Plan address the promotion of alternatives to private motor vehicles and encouraging low-emitting vehicles and vehicle efficiency.

4.15 Policies 6.1 and 6.2 deal with encouraging walking and cycling for health benefit reasons and helping residents to access services (sustainably) by integrating transport and land use policies. Policy 6.4 aims at improving Staffordshire’s road safety record and Policy 6.6 deals with reducing emissions from road transport.

4.16 The content of this Vision Document for the proposed development demonstrates that the location of the land is well placed to make use of existing local facilities and sustainable transport services/infrastructure with the need for only limited mitigation works to provide connections from the site to these facilities, sustainable infrastructure, and sustainable services.

4.17 Any subsequent planning application will be supported by a Travel Plan alongside a Transport Assessment. The Travel Plan will address the policy considerations set out in the LTP and seek to promote the residential development in a sustainable manner.

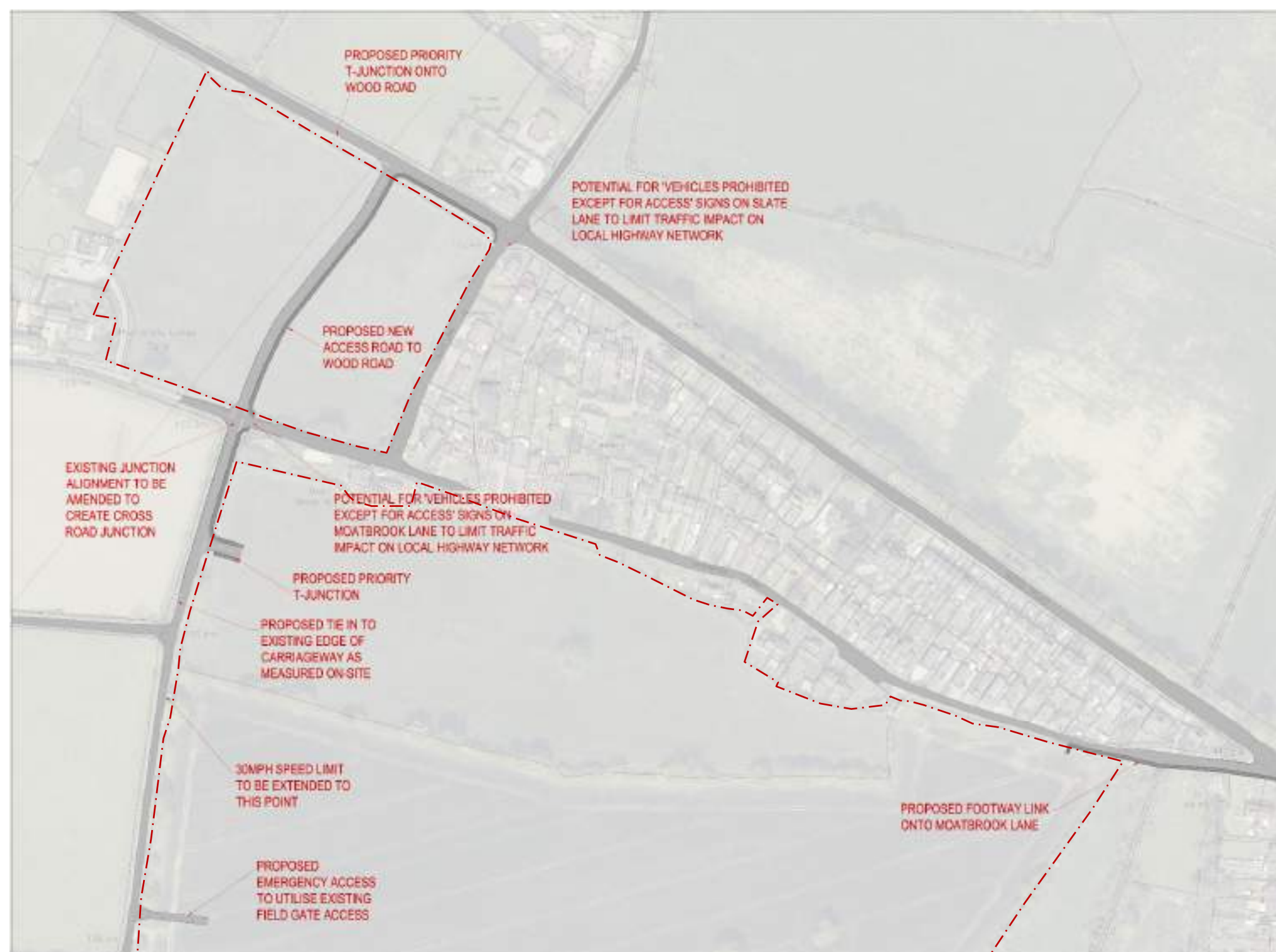
4.18 The relevant national policy is set out in the National Planning Policy Framework (NPPF) which states that:

*“Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”*

4.19 We shall, of course, be aiming for the much higher standards that that set out in local policy by encouraging active modes of travel alongside public transport as realistic opportunities to private car use.

## Proposed Access Strategy

- 4.20 At a potential site capacity of up to 230 dwellings we are proposing an access strategy that extends Strawmoor Lane northwards to serve the northern parcel of land, meeting Wood Lane at a priority junction and providing a more attractive route to Wood Lane for traffic (rather than along Slate Lane) from the development proposal and elsewhere. To help enforce this, signs indicating '*motor vehicles prohibited except for access*' are proposed to the western extent of Moatbrook Lane and on Slate Lane on its junction with Wood Road.
- 4.21 The main vehicle access to the major body of the development will be from Strawmoor Lane in the form of a priority junction, with Moatbrook Lane forming a priority crossroads junction with Strawmoor Lane and on through the northern development parcel to Wood Lane. A separate pedestrian access is provided to Moatbrook Lane in the northeast corner of the site. The access arrangements are indicated on the accompanying drawings to the left and right.
- 4.22 The site access points can accommodate a refuse lorry, which is typically the largest vehicle that might be expected to access site on a week-to-week basis.
- 4.23 The proposed development of around 230 dwellings would be expected to generate around 120 two-way peak hour vehicle trips; two vehicle movements per minute with the majority of traffic expected to head north along Strawmoor Lane. The site access strategy can easily accommodate such levels of traffic and the impact of the development traffic is such that it will be barely perceptible to existing road users on the local and wider highway network away from the site access.
- 4.24 The visibility splay requirements at the proposed site access junctions have been based on recorded traffic speeds and are in line with guidance set out in Staffordshire County Council's Residential Design Guide (Appendix A).



PROPOSED SITE ACCESS STRATEGY OVERVIEW

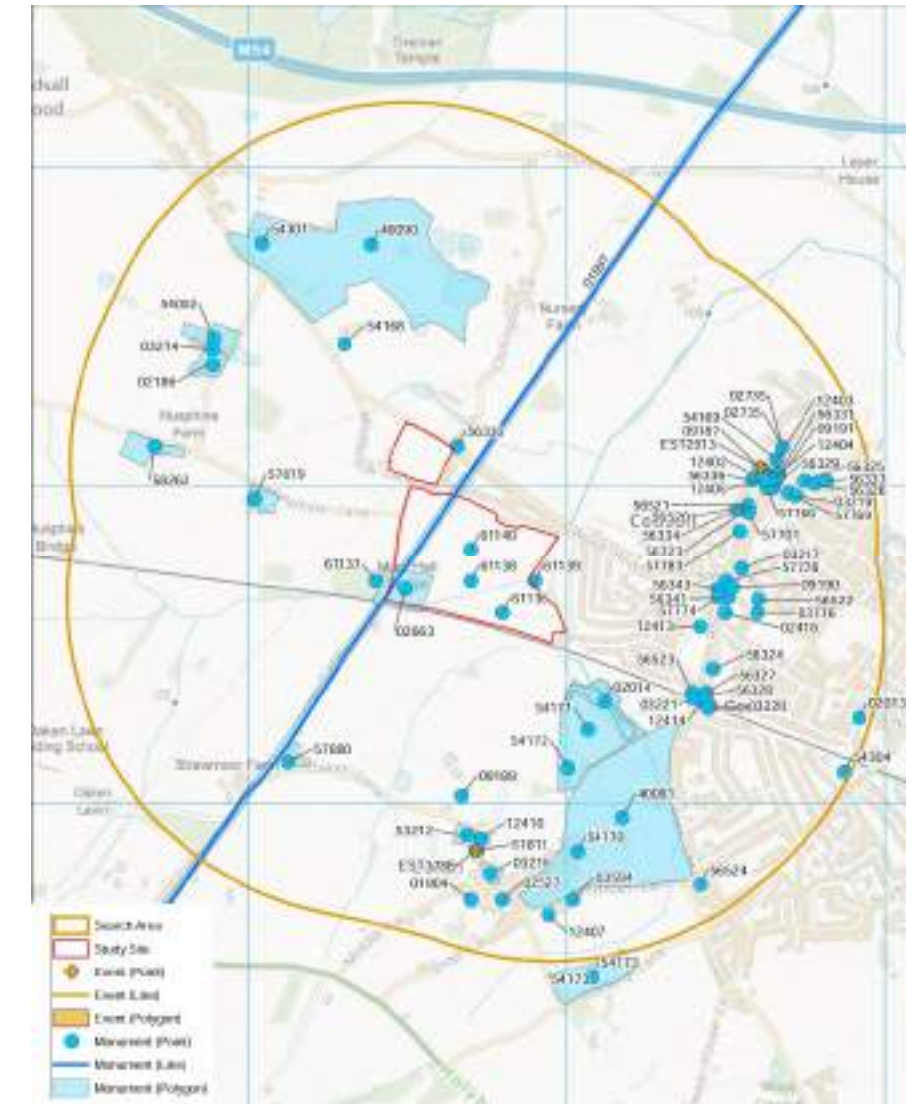
## HERITAGE AND ARCHAEOLOGY

- 4.25 Archaeological Desk Based and Built Heritage Statements have been undertaken which identify and consider heritage assets within a 1 km search radius. These assessments draw together the available archaeological, historic, topographic and land-use information in order to clarify the heritage impacts and below ground archaeological potential for the site.
- 4.26 There are no designated heritage assets on the proposed development site, and the proposed development will have no impact upon the significance of any designated heritage assets outside of the study site.
- 4.27 The site forms a neutral element of the wider settings of two of the identified built heritage assets: the Church of St Nicholas (Grade II\*) and the Codsall & Oaken Conservation Area (designated 1973). However, the proposed development of the site could be sensitively designed to protect their respective significance. Therefore the proposed development of the site would cause no harm to the significance of any built heritage assets.



VIEW EAST FROM STRAWMOOR LANE ACROSS SITE

- 4.28 The study site contains no evidence for remains of Prehistoric date, and only very limited evidence has been recovered from within the 1km search area pertaining to Prehistoric activity.
- 4.29 There are two records of Medieval activity within the study site: the remains of Moor Hall and Moat (see 1831 plan) and a Medieval padlock. In addition, the LiDAR imagery indicates that the site formerly contained ridge and furrow which may be of Medieval date. No remains of Saxon/Early Medieval date area recorded within the study site on the HER.
- 4.30 Except for the southwest corner of the study site, the site is considered to have a negligible potential for significant remains of Saxon/Early Medieval or Medieval date. The southwestern corner of the study site however is considered to have a high potential for remains of Medieval date relating to the former Moor Hall and Moat. It should be noted that the current Illustrative Masterplan for the proposed development envisages limited development within the area of Moor Hall and Moat.



MONUMENT AND EVENT DATA



PLAN OF THE TOWNSHIP OF CODSALL, 1831

## LANDSCAPE AND VISUAL



### Policy Context

- 4.31 The site is not subject to any national landscape designations. The site lies within the Green Belt.
- 4.32 The site is located within the South Staffordshire district, located to the north western edge of Wolverhampton and to the west of Codsall residential suburb. Applicable local policy objectives address the need to enhance the landscape of the Green Belt and the green infrastructure of the District.
- 4.33 There are no public footpaths running through or adjacent to the four fields; however, a network of Public Rights of Way are present across the wider landscape.

### IMAGES

- 1 View facing south from Moatbrook Lane
- 2 View facing west from junction located at Wood Road and Slate Lane
- 3 View facing south west from Moatbrook Lane
- 4 View facing east from Strawmoor Lane





## Landscape Character

4.34 At a regional level, within the Staffordshire County Council Planning for Landscape Change SPD (2000), the site is identified as being located within the 'Ancient Clay Farmlands'.

4.35 The key characteristics of the Ancient Clay Farmlands include:

- *A gently rolling landform with localized meres and mosses*
- *An irregular field pattern defined by ancient hedgerows*
- *Narrow winding, often sunken lanes*
- *Hedgerow damsons and occasional native black poplars*
- *Marl pits and field ponds*
- *Dispersed settlement pattern of farmsteads and wayside dwellings*
- *Traditional red brick and clay tile buildings*

4.36 Detracting features in the area identified by the SPD include the following:

- *Busy main roads and motorway*
- *Powerlines*
- *Large modern farm buildings*
- *Industrial developments*
- *Electrified railway line*
- *Urban edge*
- *Improved and new commuter dwellings*
- *Introduction of wire fencing for tock control associated with deteriorating field pattern*



## Site-Specific Context

4.37 PARCEL A: Bounded by dense hedgerow planting; the eastern boundary influenced by the existing residential edge of Codsall. Three of the four boundaries are surrounded by roads with access from Moatbrook Lane along its southern boundary. This parcel comprises a singular grassland field which slopes gently to the east with no internal landscape features.

4.38 The larger southern parcel comprises 3 irregular-shaped fields (B, C and D). The northern boundary is influenced by existing properties off Moatbrook Lane, although intervening hedgerows separate the site from the residential edge. Mature hedgerows and trees strongly distinguish the individual parcels, with a scattering of mature trees providing the only internal landscape features.

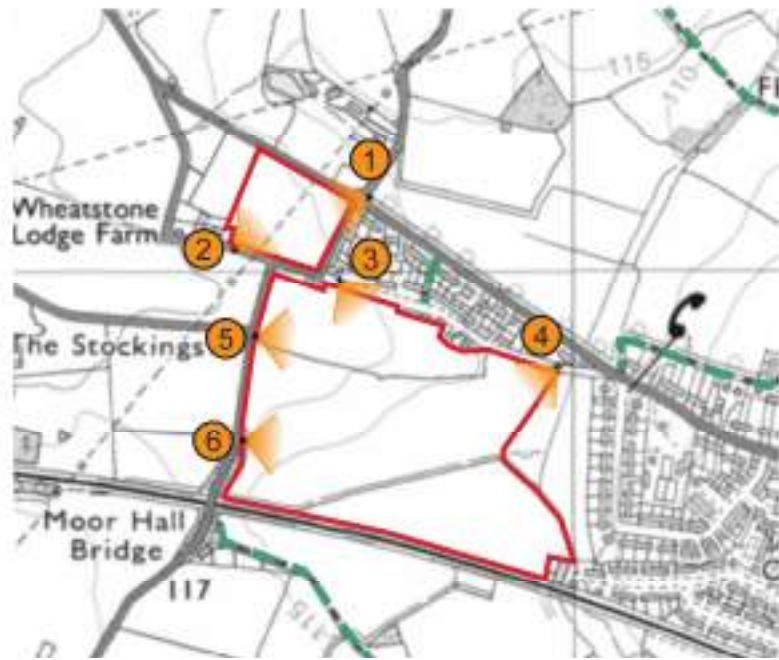
4.39 To the south of the site lies the railway line and associated vegetation. Strawmoor Lane bounds the western edge to parcel B and C with small fields surrounded by dense vegetation to the east of parcel C and D.

4.40 The hedgerow field boundaries along with hedgerow tree planting provide containment and structure and are also characteristic features within the local landscape. They will be retained and enhanced wherever possible to strengthen the contained nature of the site and filter the new development and existing built edge.

4.41 Development fronting Moatbrook Lane and Wood Road will respect the character of existing properties that are set back from the road frontage, retaining good quality tree stock.

4.42 Field parcels B, C and D are irregular-shaped and expansive with a small number of internal hedgerows to separate them. Scattered field trees are located within parcels B and C.

4.43 Parcel C and D are divided by a ditch with associated vegetation. The Flood Zone covers a large part of Parcel C and D as shown on the Landscape Opportunities and Constraints Plan.



### Views

- 4.44 Both parcels relate visually to the existing settlement edge. The northern parcel lies adjacent to properties on either side of the road junction (see view 1), with dense hedgerow filtering views into the site. Slate Lane to the left of the viewpoint is a single track road that runs adjacent to the boundary vegetation of the northern parcel.
- 4.45 Viewpoint 2 shows a view from Moatbrook Lane facing east with filtered views across the site. There are no internal hedgerows or trees, with topography sloping gently to the east. The northern parcel is further influenced by built form in the way of Wheatstone Lodge Farm, accessed via the gate shown in the view.
- 4.46 Viewpoint 3 shows the view from Moatbrook Lane facing south-east towards the southern parcel. The site land is slightly raised adjacent to the roadside, although bound by mature hedgerow and trees restricting views into the site itself.



4.47 Viewpoint 4 is from the north-eastern corner of the main parcel looking south-west across the site. The residential influence is highlighted by the properties along Moatbrook Lane. All field parcels are bound by mature hedgerows and vegetation, although the site itself is expansive with no internal trees. The hedgerow along the eastern section of Moatbrook Lane is gappy and allows for clear views into the site.



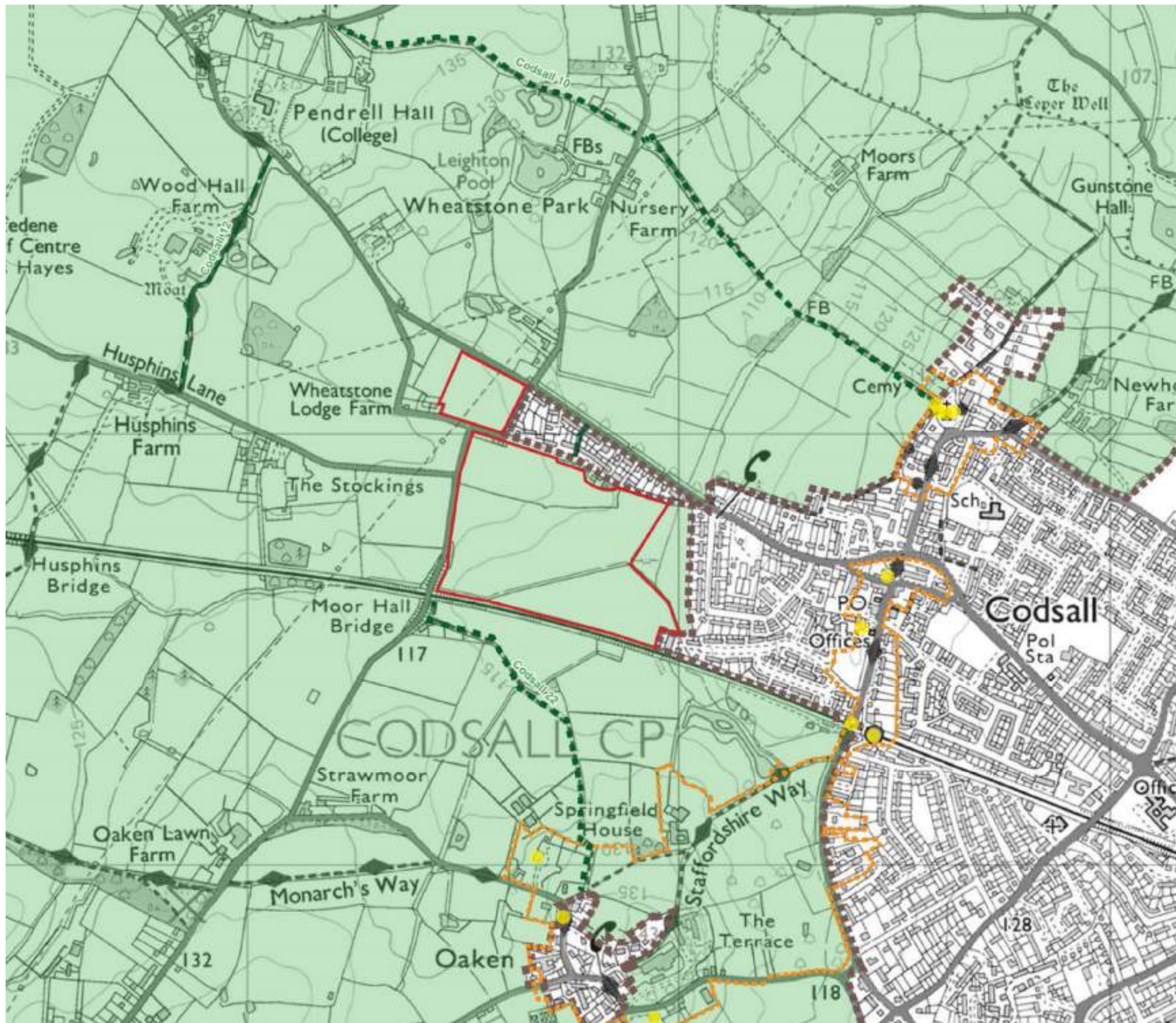
4.48 Viewpoint 5 is from the western boundary of the main parcel; existing properties along Moatbrook Lane visibly providing a developed backdrop. The internal hedgerows are well-maintained and provide a strong distinction between parcels. The topography of the southern, larger parcel slopes gently towards the brook which dissects the site from east to west.



4.49 Viewpoint 6 is from the western boundary of the main, open field parcel, the southern extent of the site. Expensive views are possible with boundary vegetation providing a backdrop between existing properties to the east. The railway line lies to the right hand side of this view point, bound further by mature vegetation which restricts the possibility of any distant views towards the site.

## IN SUMMARY

Overall, the site relates well to the existing residential edge of Codsall, with the proposed development providing no uncharacteristic or incongruous features. Views are limited and localized and all feature urban influences, with the railway line and associated vegetation to the south further restricting distant views.



- Site Boundary
- South Staffordshire Local Plan (2012):*
- Development Boundary
- Green Belt: Policy GB1
- Conservation Areas: Policy EQ3
- Public Rights of Way:*
- Footpaths
- Bridleways
- Other Designations:*
- Listed Buildings

LANDSCAPE PLANNING ANALYSIS AND PUBLIC RIGHTS OF WAY

4.50 The site is largely contained by development along Moatbrook Lane and Wood Road to the north, and the edge of Codsall to the east, placing the site within the built extents of the settlement. The parcel of land within the site to the west of Slate Lane is similarly well contained by roads that form robust boundaries. Development would not extend beyond the existing development of Moatbrook Lane and would be contained by the existing roads. Considering the above, any sprawl would be well contained within the existing fields, built edge and infrastructure network.

4.51 Trees along Woods Road and hedgerows and trees to fields bounding the site provide further physical and visual containment. To the south, the site is contained by the railway line and lies adjacent to the extents of existing residential on the edge of Codsall to the east, therefore the site does not prevent coalescence of Codsall Wood to the north and Oaken to the south. There are opportunities for the strengthening of the boundary along the railway line with additional tree belt/woodland planting.

4.52 The land between Moatbrook Lane and the railway line comprises agricultural fields including hedgerows and trees to field boundaries. To the east, tree belts and woodland provide separation with the adjacent built edge. Away from the influence of properties on Moatbrook Lane, the southern site area has a more rural character and sense of being in the countryside, although the railway line, passing trains and influence of the adjacent settlement place the site within an urban fringe/peri urban context. Whilst there are hedgerows and trees dividing the southern site area, these are degraded and gappy in places, with field trees indicating former field boundaries and railway line being open along much of its length. There are therefore opportunities for reinstating and enhancing field boundaries and providing new hedgerow, tree and woodland planting in this area to strengthen the landscape character and the physical and visual boundaries to the site at the interface with the wider landscape and Green Belt to the south. The development site therefore makes a limited contribution to Green Belt purposes.

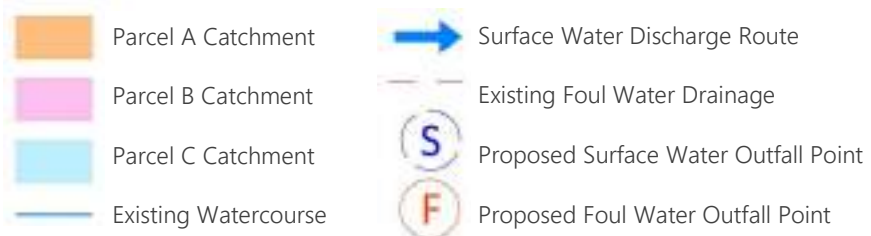


## LANDSCAPE OPPORTUNITIES AND CONSTRAINTS

## FLOOD RISK AND DRAINAGE



DRAINAGE STRATEGY PLAN



- 4.53 The site is shown to be predominantly in Flood Zone 1, which is land considered to have a low probability of fluvial/tidal flooding. There are some lower areas of the site which are in Flood Zones 2 & 3 these are not proposed for development.
- 4.54 One ordinary water course is present, entering from the west and flowing eastwards, becoming a Main River on the eastern boundary.
- 4.55 No record of historic flooding on the site exists, however, anecdotal evidence suggests that the lowest parts of the site (i.e., those adjacent to the watercourse) are seasonally wet, which is to be expected. A sequential approach to the development layout is sufficient to reduce the risks relating to the watercourse.
- 4.56 The area is not considered to be at notable risk from groundwater-flooding and there are no small or large waterbodies that pose a risk to the site should they fail.
- 4.57 Tidal and canal sources are not considered to pose a risk due to the distance and terrain between the site and such features.
- 4.58 The topography of the site supports the use of gravity storm drainage, with a general fall towards existing watercourses.
- 4.59 It is anticipated that some foul drainage will require pumping. A pumping station will therefore be required on the site at a location which is to be determined based on the final layout requirements.
- 4.60 An initial surface water drainage strategy has been produced for the site and is incorporated within the indicative masterplan. It is proposed that on site attenuation is provided up to the 1 in 100 year plus climate change event, using sustainable drainage systems with a networks of swales and ponds providing suitable flow conveyance, attenuation and a controlled outfall at greenfield runoff rates.
- 4.61 The drainage strategy has been developed with an aim of making parcels self-sufficient wherever possible to remove a reliance on large, site-wide infrastructure and to promote the interception of exceedance flows, working with the natural topography to locate attenuation features in the low points of each parcel.
- 4.62 The development parcels and associated sustainable drainage infrastructure have been located so as to avoid encroachment into the flood zones as presently shown on EA mapping. Pre-application advice has been sought from the Lead Local Flood Authority who are accepting of these principles and the general strategy. There may be opportunity to provide further betterment along Moatbrook Lane by capturing and diverting overland flows into the on site drainage, subject to further technical studies.

## ECOLOGY

4.63 An initial preliminary ecological appraisal and desk-based study was undertaken in August 2018, by RammSanderson. The purpose of the preliminary ecological appraisal was:

- To classify the habitat types on the proposed site
- To evaluate any potential for protected species to be present
- To identify any significant ecological impacts likely to result from the proposed development
- To provide recommendations for further surveys that might be required

### Habitats

4.64 The site was dominated by arable fields and improved grassland bounded by hedgerow, drains and scattered trees, with field margins of scrub and poor semi improved grassland. No ponds were identified on the site, however there were eleven ponds identified within 500m of the site. Several of these were beyond major dispersal barriers. Three ponds were identified that may provide suitability for great crested newt (GCN).

4.65 The majority of habitats onsite are considered to be of low inherent ecological value. However, the dense continuous scrub hedgerows and trees are of ecological and intrinsic value at the site level. These habitats where possible shall be retained. Any of these habitats that will be lost shall be mitigated through landscape replanting.

### Protected/Priority Species

4.66 The site offers potential for protected species, notably: bats, breeding birds, GCN, otter, water vole and white clawed crayfish dedicated surveys for these species will be undertaken to identify their presence and inform the scale of any required mitigation. Badger, reptiles and local biodiversity action plan (LBAP) species such as brown hare shall be mitigated for on site accordingly with sensitive vegetation management and precautionary methods of works during construction.

### Designated Sites

4.67 No statutorily designated sites were recorded within 2km of the site and the closest site was over 4km away (Donington and Albrighton Local Nature Reserve) from the site boundary.

4.68 The closest non-statutory designated site was a Biodiversity Alert Site (BAS). The site has been retained due to the type of habitat (wet pasture) and plant diversity within the drain running through the BAS. Due to proximity of this site considerations will be taken into account, to ensure the site is not disturbed during and post construction. Reduction in footfall to this site shall be undertaken through solutions designed to reduce pedestrian access to the BAS.

### Opportunities for Enhancement

4.69 The recently revised NPPF 2018 requires sites to deliver biodiversity net gains and benefits. Therefore, additional enhancements shall be provided within the development plan to achieve this objective. Where new landscape

planting is proposed species commonly occurring locally shall be used. Where losses of hedgerows, or individual tree removals cannot be avoided planting will be of a "like for like or better" basis.

4.70 Areas of the site to the south are proposed for Green Infrastructure provision, which provides a corridor through the site, linking the existing Moat Brook BAS, to the woodland and farmland to the west. The current drain that flows into Moat Brook will be retained and provides suitable commuting and foraging for several different species. The features shall be retained and enhanced with additional native planting to buffer the ditch from the proposed development.

4.71 Other additional enhancements that can be provided include the incorporation of bat boxes and bird nest boxes. Implementation of hedgehog(/mammal) friendly fencing and gaps in gravel boards will also be implemented to prevent isolation and fragmentation for these species.



ECOLOGICAL OPPORTUNITIES AND CONSTRAINTS PLAN



- KEY**
- - - SITE BOUNDARY
  - EXISTING TREES AND HEDGES
  - ➔ POTENTIAL ACCESS LOCATIONS
  - - - OPPORTUNITIES FOR HIGHWAY IMPROVEMENTS
  - ⋯ EXISTING PUBLIC RIGHTS OF WAY
  - ➔ OPPORTUNITIES FOR FOOTPATH CONNECTIONS
  - ➔ RESIDENTIAL AMENITY CONSIDERATIONS
  - ▭ FLOOD ZONE
  - ▭ ELECTICITY CABLES AND CLEARANCE ZONE
  - ⋯ INDICATIVE TOPOGRAPHY
  - ▭ POTENTIAL LAND TO BE ENHANCED AND RETAINED AS GREENBELT
  - ▭ POTENTIAL FOR ARCHAEOLOGICAL REMAINS OF MOORHALL AND MOAT



# SUMMARY OF ANALYSIS

4.72 Richborough Estates have considered landscape character, ecology, highways, flood risk and drainage, heritage and archaeology, and it has been demonstrated that there are no constraints that would preclude development at the site. The analysis has shown:

- The site is well-located in terms of local facilities and services, in particular to local bus and train services
- The site access strategy can easily accommodate levels of traffic envisaged to be associated with the proposed development; it is considered that the impact of such development traffic will be barely perceptible to existing road users on the wider highway network
- There are no designated heritage assets on the proposed development site, and the proposed development will have no impact upon the significance of any designated heritage assets outside the study area
- The site relates well to the existing residential edge of Codsall, with the proposed development providing no uncharacteristic or incongruous features
- Views are limited and localised and all feature urban influences, with the railway line and associated vegetation to the south further restricting distant views
- The development site makes a limited contribution to Green Belt purposes
- The majority of habitats on site are considered to be of low inherent ecological value
- Dense continuous scrub hedgerows and trees are of ecological and intrinsic value; these habitats will be retained wherever possible


4.73 Principal considerations and opportunities that a development proposal should take into consideration are as follows:

## CONSIDERATIONS

- Site topography and associated high/low points;
- Existing landscape comprising mainly hedgerows and trees at field boundaries
- Areas of the site subject to surface water flooding
- Ecological value of existing habitats
- Existing electricity cables and associated no-build easements
- Residential amenity of existing dwellings
- Local vernacular and character of existing residential areas
- Transitional location of the site between built up areas and the wider countryside
- Impact on the existing highway network
- The potential for development to extend north-westwards along Wood Road to cause the perceived visual coalescence and merging with adjacent properties

## OPPORTUNITIES

- To provide access into the site from existing road network (Strawmoor Lane)
- To create an attractive new walkable neighbourhood
- To create a high quality, distinctive and landscape led development supported by public open space, children's play, sports and community allotments
- To create a highly sustainable living place which offers a range of dwelling types, sizes and tenures and increases housing choice
- To make efficient use of land, though the application of a range of appropriate densities
- To create development identity areas which draw upon local vernacular and complement existing character
- Provide a fully interconnected landscape structure, based on retention of existing mature trees and hedgerows, and enhancement where necessary
- Improvements to Strawmoor Lane/Moatbrook Lane junction and provision of new link road between Moatbrook Lane and Wood Road
- Provision of new footpath network through public open space and connectivity to existing Public Rights of Way

A scenic landscape photograph. In the foreground, a large, leafy tree with thick branches frames the top and right sides of the image. Below the tree, there is a dense thicket of green bushes and shrubs. In the middle ground, a vibrant green field stretches across the frame. In the background, a dirt road or path leads into a line of trees under a bright sky. The overall scene is lush and natural.

“Planning policies and decisions should ensure that developments establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit”



**05**

VISION FOR LAND AT  
STRAWMOOR LANE



**KEY**

- ① Continuous north-south linear green space corridor
- ② Continuous east-west linear green space corridor accommodating retained field boundary landscaping
- ③ Proposed central open space feature straddling east-west linear green space
- ④ Proposed pedestrian footpath connections
- ⑤ Proposed road framework linked for vehicle permeability
- ⑥ No vehicular access along Slate Lane (existing roadside hedgerow to be retained and enhanced where necessary)
- ⑦ Existing landscaping to be retained and enhanced where necessary
- ⑧ Proposed surface water attenuation (to incorporate permanent water features and opportunities for ecological and biodiversity enhancements)
- ⑨ Continuation of building frontage
- ⑩ Proposed 'Multi Use Games Area' (MUGA)
- ⑪ Proposed 'Local Equipped Area for Play' (LEAP)
- ⑫ Proposed Allotments (approx. 0.5 ha)
- ⑬ Proposed parking for Allotments and MUGA

- Existing Public Rights of Way
- Existing electrical cables and clearance zone
- Existing Watercourse

**PROPOSED HIGHWAY WORKS**

- A Strawmoor Lane/Moatbrook Lane junction improvements
- B New road link (as northwards 'extension' of Strawmoor Lane) between Moatbrook Lane and Wood Road
- C Proposed footway link onto Moatbrook Lane
- D New continuous footpath within site along Strawmoor Lane frontage

**PROPOSED MOVEMENT HIERARCHY**

- ➡ Proposed site entrances
- ➡ Proposed Emergency access off Strawmoor Lane
- Proposed primary residential access road
- Proposed secondary residential access road
- Proposed shared surfaces
- Proposed private driveways
- Proposed black-top footpath
- Proposed informal pathways through open space

# 05 VISION, CONCEPT PLAN AND DESIGN PRINCIPLES

## VISION FOR STRAWMOOR LANE

- To produce a new living environment of the highest standard, with a clear recognisable identity which is complementary to the vernacular and character of Codsall
- To provide the right ingredients for a balanced and sustainable new development, which provides a range of high quality homes and a range of publicly accessible open spaces
- To provide a range of new community infrastructure to benefit existing and new residents of Codsall alike
- To establish safe, attractive and secure neighbourhoods, streets and places which promote social interaction and afford access and movement priority to pedestrians and cyclists
- To apply the practical use of environmentally friendly technology and techniques through the development, with the emphasis on carbon reduction, energy-saving and the avoidance of waste
- To provide a locally-inspired and meaningful new green space network which enhances the character of the site and natural environment and creates a robust and enduring new Green Belt boundary
- To create a place which will enhance the attraction of Codsall as a place to live, incorporating aspects of local character, landscape, heritage, visual amenity and biodiversity

## MAIN DESIGN PRINCIPLES

- Continuous north-south linear green corridor
- Continuous east-west linear green space corridor accommodating retained mature field boundary landscaping
- Proposed central open space feature straddling east-west linear green space
- Proposed pedestrian footpath connections
- Proposed road framework linked for vehicle permeability
- No vehicular access along Slate Lane (existing roadside hedgerow to be retained and enhanced where necessary)
- Highway improvements to Strawmoor Lane/Moatbrook Lane junction
- Proposed footway link from site onto Moatbrook Lane
- New continuous footpath within site along Strawmoor Lane frontage
- Existing landscape to be retained and enhanced where necessary
- Proposed surface water attenuation (to incorporate permanent wet features and opportunities for ecological and biodiversity enhancements)
- Continuation of building frontage along Moatbrook Lane
- Proposed areas for play, including 'Multi Use Games Area' and 'Local Equipped Area for Play'
- Proposed allotments and associated parking facilities

## SUMMARY OF PROPOSALS:

- Number of dwellings provided = Approx. 230
- Net Developable Area = 6.980 Ha (17.25 Acres)
- Approximate residential density = 33/34 dph
- Total Open Space Area = 10.740 Ha (26.540 Acres)

### PROPOSED COMMUNITY FACILITIES:

- Allotments (approx. 0.5 Ha)
- Multi-use Games Area (MUGA)
- Local Equipped Area for Play (LEAP)
- Proposed parking for Allotments and MUGA

### PROPOSED HIGHWAY IMPROVEMENTS:

- Strawmoor Lane/Moatbrook Lane junction improvements
- New road link (as northwards 'extension' of Strawmoor Lane) between Moatbrook Lane and Wood Road)
- Proposed footway link onto Moatbrook Lane
- New continuous footpath within site along Strawmoor Lane frontage



INITIAL PROPOSALS



REFINED PROPOSALS

KEY

- EXISTING ROADS
- INDICATIVE PROPOSED PRIMARY ROADS
- INDICATIVE PROPOSED SECONDARY ROADS
- INDICATIVE PROPOSED PRIVATE DRIVES
- PROPOSED ALLOTMENT PARKING AREA
- ➔
PROPOSED VEHICULAR ACCESSES
- ➔
PROPOSALS FOR PRIVATE DRIVEWAY ACCESSES ONTO EXISTING ROAD NETWORK
- ➔
PROPOSED EMERGENCY ACCESS
- POTENTIAL FOR 'VEHICLES PROHIBITED EXCEPT FOR ACCESS' SIGNS

## DESIGN EVOLUTION

- 5.1 Initial scheme proposals comprised two main vehicular accesses, as well as a number of private driveways, onto Strawmoor Lane. In addition, while the proposed northern extension of Strawmoor Lane (connecting to Wood Road) was included at an early stage, these initial proposals included a number of individual private driveway accesses onto Slate Lane.
- 5.2 Proposals were further developed and refined to take on board feedback from Staffordshire County Council (SCC) following pre-application advice.
- 5.3 The concept layout was subsequently amended and improved as follows:

- Vehicular access to the northern parcel taken from new Strawmoor Lane road extension link road
- No direct private driveway accesses onto Slate Lane
- No private driveway accesses onto Strawmoor Lane
- One single vehicular access from Moatbrook Lane to main development parcel
- Vehicular loop arrangement link road to southern land parcel (within main parcel)
- Potential location for proposed allotment parking area indicated
- Southern vehicular access from Strawmoor Lane moved northward to utilise existing gap in hedgerow; access to be for emergency vehicles only
- Potential for 'vehicles prohibited except for access' signs included at the Moatbrook Lane/Strawmoor Lane junction, as well as on Slate Lane at its junction with Wood Road, to limit traffic impact on local highway network

## DESIGN ASPIRATIONS

- 5.4 South Staffordshire Council's Supplementary Planning Document (SPD) *Village Design Guide* (adopted 15 September 2009) states that large scale developments have the potential to enhance or regenerate the character of a settlement significantly, perhaps involving the creation of new neighbourhoods or places, which should complement and strengthen the character of an existing village.
- 5.5 In line with 'Key Development Design Principles' set out in the SPD, it is envisaged that the scheme will be designed to create a new character area; one which is 'highly permeable and closely integrated both with the established village fabric and its enclosing countryside.'

- 5.6 The building materials typically and frequently seen in the village, and as identified in *Village Design Guide* are as follows:

**Tiles:** Red clay  
**Bricks:** red  
**Facing:** Render, some painted  
**Doors & windows:** Timber

- 5.7 It is envisaged that proposed dwellings will be designed to complement this already-established materials palette.
- 5.8 New dwellings, whilst being 'contemporary', will be designed to form part of the evolving built tradition in respect of their form, siting, materials and features.





“Planning policies and decisions should ensure that developments optimise the potential of the site to accommodate and sustain an appropriate mix of development (including green and other public open green space) and support local facilities and transport network”



A high-speed train is shown from a high-angle perspective, traveling away from the viewer on a track that curves through a lush, green, hilly landscape. The sky is filled with white and grey clouds. The train is yellow and white, and its tracks are dark with gravel. The overall scene is bright and natural.

# 06

## SUMMARY AND CONCLUSION



# 06 SUMMARY AND CONCLUSION

## SUMMARY AND CONCLUSION

- 6.1 This Promotional Document demonstrates that there is a need to accommodate an increased amount of housing land within the Green Belt and there are exceptional circumstances that exist for the targeted release of Green Belt land as part of the Local Plan Review in order to meet this identified need.
- 6.2 The site presents an exceptional opportunity to deliver approximately 230 new market and affordable dwellings to meet the future housing need of South Staffordshire without undermining the purposes of the Green Belt or adversely impacting upon the environment.

6.3 In summary, this promotional document has illustrated that the site would:

- Positively contribute to the identified need for new housing and create a range and mix of housing types that will make a positive contribution to the District's housing requirements by providing a mix of types and tenures of dwellings, including new affordable homes;
- Represent a logical and natural extension to the existing urban area that has strong physical boundaries and is well-contained;
- Be sustainably located on the edge of Codsall and within proximity to a wide range of local facilities and services, with Codsall neighbourhood centre located only approximately 0.5 miles from the site;
- Accommodate a high quality residential development that nestles within the surrounding landscape and green space network;
- Deliver an overall development vision for the site that provides a well-designed and sympathetic development in a sustainable location in Codsall;

- Generate growth and provide significant social benefits as well as benefits to the local economy, including construction spend and investment generated by new residents; and
- Have no identified technical or environmental constraints that will prevent its delivery

6.4 The site can support South Staffordshire District Council in planning for its future development needs and achieving long term sustainable development. The site is appropriate for Green Belt release and allocation for housing development because it is well contained, has physical and defensible boundaries, and will not impact on the core purposes of the Green Belt. The site forms a logical extension to the residential area of Codsall.



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