

SOUTH STAFFORDSHIRE LOCAL PLAN PREFERRED OPTIONS NOVEMBER 2021

LAND OFF WROTTESELEY PARK ROAD, PERTON

**REPRESENTATION PREPARED ON BEHALF OF
RICHBOROUGH ESTATES / TAYLOR WIMPEY UK LTD**



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



Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Edinburgh | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough | Solent

DESIGN ENVIRONMENT PLANNING ECONOMICS HERITAGE

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Group.

Pegasus Group is a trading name of Pegasus Planning Group Limited [07277000] registered in England and Wales Registered Office: Pegasus House, Guern's Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited.

CONTENTS:

Page No:

1.0	Introduction	1
2.0	What Does the Local Plan Need to Consider?	3
3.0	Development Strategy	8
4.0	Site Allocations	15
5.0	Development Management Policies.....	17
6.0	Sustainability Appraisal	29
7.0	Land off Wrottesley Park Road, Perton	34
8.0	Conclusion	58

APPENDICES:

Appendix 1: Illustrative Masterplan

Appendix 2: Transport Note

Appendix 3: 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 Wrottesley Park Road, Perton, which Richborough Estates is promoting for residential-led development. An Illustrative Masterplan is included at **Appendix 1** to this Representation.

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

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

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

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

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

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

2.0 What Does the Local Plan Need to Consider?

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

National Requirements for Plan-Making

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

Evidence Base

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

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

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

development.

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

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

Infrastructure Delivery Plan

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

Question 2:

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

Yes/No

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

Yes/No

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

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

2.14 Development of Land off Wrottesley Park Road, Perton, 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 The IDP also recognises a key piece of infrastructure as being the delivery of highways improvements around Perton, stating that "*Perton has been identified as a longstanding concern for local residents*". It goes on to state that the delivery of the current site allocation (safeguarded land ref: 239) could facilitate improvements to the A41 junction that would alleviate some of the existing congestion.

2.16 Having undertaken a significant amount of technical work in respect of Land off Wrottesley Park Road, Richborough Estates submits that it is highly unlikely that the allocation of the safeguarded land alone will be able provide sufficient S106 funding to deliver the improvements that are necessary. Allocation of Land off Wrottesley Park Road would result in the provision of significantly greater funding to allow for the identified junction improvement works.

2.17 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 Cross Green.

Vision and Strategic Objectives

2.18 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

2.19 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.

2.20 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.

2.21 Overall, it is considered that the draft emerging policies will assist in delivering these objectives.

3.0 Development Strategy

Green Belt and Open Countryside

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

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

Housing

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

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

Spatial Strategy to 2038

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

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

Housing Requirement for South Staffordshire District

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

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

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

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

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

3.12 These circumstances are considered in further detail below.

Unmet Housing Needs from the Wider Housing Market Area

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

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

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

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

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

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

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

Economic Uplift

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

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

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

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

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

This may require an uplift in local housing needs identified.

Spatial Strategy

- 3.22 SSDC previously consulted on a Spatial Housing Strategy and Infrastructure Delivery (SHSID) document in October 2019. This looked at how the proposed housing target could be distributed between different settlements and other broad locations within the District.
- 3.23 Richborough Estates does not support the limiting of new allocations at Perton to only the land safeguarded through the adopted SAD. Perton is identified through Policy DS3 as a 'Tier 2' Settlement, which are the second most sustainable settlements in the District. These settlements should therefore be allocated a proportionately significant amount of growth.
- 3.24 The justification for limiting allocations at Perton to only the safeguarded land is stated at paragraph 4.16 to be "*...the lack of a finalised junction improvement scheme at the A41 and the remoteness of Green Belt site options from education facilities.*"
- 3.25 Richborough Estates disputes the above assertion, and a Technical Note has been prepared by Hub Transport Planning Ltd, appended at **Appendix 2** to this Representation, to support this position.
- 3.26 The Note demonstrates that SSDC's conclusion regarding the non-allocation of site 407 is not supported by evidence. Furthermore, the transport and accessibility mitigation and improvements proposed for the site; contribution to works at the A41, new footway/cycleway links and crossings, and a new school on the site, will provide enhancements for users of the transport network beyond just the residents of the proposal site.
- 3.27 Indeed, the highway authority (SCC), has stated that they could not support SSC's exclusion of site 407 from the local plan on transport and accessibility grounds.

- 3.28 It is therefore contended that there are significant planning and infrastructure benefits to allocating Land off Wrottesley Park Road, Perton, for development through the LPR.

Longer Term Growth Aspirations for a New Settlement

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

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

- 3.30 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.
- 3.31 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 Coast Mainline runs through its western edge.
- 3.32 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.

- 3.33 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 Wrottesley Park Road, Perton, 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 Wrottesley Park Road, Perton, should also be included within Policy SA5 and allocated for

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

- 5.14 It is recognised that a Stage 2 Viability Assessment will be undertaken once more refined and bespoke assumptions regarding infrastructure and development costs are known. It also is understood that the Infrastructure Delivery Plan will continue to be evolved and refined as the Local Plan review progresses.
- 5.15 Richborough Estates would welcome the opportunity to engage with the Council and the appointed viability consultants prior to the publication of the Stage 2 Assessment.
- 5.16 The requirement to ‘peppercot’ affordable housing in clusters across the development is generally supported. However, the policy should recognise that for management purposes, Registered Providers do require a degree of clustering of affordable housing within a development and this will inform site layouts.
- 5.17 Policy HC3 also suggests it would not support grant funding for homes to be provided under the requirements of the Policy. It is submitted that the funding mechanisms for the delivery of affordable housing is not a planning matter and is therefore beyond the remits of a Policy to control. This text should accordingly be removed.

Policy HC4 – Homes for Older People

- 5.18 Policy HC4 requires major development to:

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

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

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

- 5.19 The above policy wording does not define 'older people', so it is unclear as to exactly who this Policy is targeting or who would be eligible to occupy such dwellings.
- 5.20 It also is also unclear as to the level of bungalows or other ground floor accommodation that development is expected to provide. This should be quantified to ensure less scope for unnecessary discussions between developers and SSDC at a later stage in the application process. It is not clear if this policy intends to continue to SSDC's current approach of requiring 10% of all homes to be delivered as bungalows or other ground floor accommodation. This clarification is particularly important now that affordable compact domestic lifts are increasingly becoming an alternative to ground floor accommodation. New builds can be designed so that these can be fitted to a property when required.
- 5.21 The policy also sets out that 30% of all market and affordable homes should meet Building Regulations Standard Part M4(2) Accessible and adaptable dwellings. These requirements are optional within Building Regulations and are described as making *"reasonable provision for most people to access the dwelling and incorporate features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users."* It is recognised that the older person population is likely to increase over the plan period, however an ageing population affects the whole country and is not an issue specific to South Staffordshire. If the Government had intended that evidence of an ageing population alone

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

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

Policy HC7 – Self & Custom Build Housing

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

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

Policy HC9 – Design Requirements

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

Policy HC11 – Space about dwellings and internal space standards

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

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

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

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

Policy HC12 – Parking Standards

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

Policy HC14 - Health Infrastructure

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

Policy HC15 – Education

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

Policy HC17 – Open Space

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

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

Policy HC18 – Sports Facilities and Playing Pitches

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

Policy EC3 – Inclusive Growth

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

Policy EC9 – Infrastructure

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

Policy EC10 – Developer Contributions

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

Policy NB1 - Protecting, Enhancing and Expanding Natural Assets

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

Policy NB3 - Cannock Chase SAC

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

Policy NB6 - Energy and Water Efficiency, Energy and Heat

Hierarchies and Renewable Energy in New Development

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

6.0 Sustainability Appraisal

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

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

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

qualifications in the Plan area; and

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

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

6.3 The significance of effects is scored as follows:

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

	elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.
--	---------------------------------------------------------------------------------------------------------------------------------------------

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 West of Wrottesley Park Road (North) – Site Ref: 407

6.5 Land West of Wrottesley Park Road (North) is assessed within the SA under site reference: 407. 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
407	+/-	-	-	--	-	-	+	-	-	-	--	-

Table 6.1: Significance of effects pre-mitigation, Site Ref: 407

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
407	+/-	+	+/-	--	0	-	+	-	0	-	--	-

Figure 6.2: Significance of effects post-mitigation, Site Ref: 407

- 6.6 Richborough Estates disputes the above post-mitigation findings, particularly in respect of landscape and townscape and education.
- 6.7 The SA concludes that the development of the Site would result in a Major Negative ('--') impact upon landscape and townscape. This appears to derive from the finding in the accompanying Green Belt Study⁷ that the development of the site would cause a 'high' level of harm to the purposes of the Green Belt.
- 6.8 However, despite the SA apparently considering the potential impact of mitigation, it does not appear that the opportunity to provide a country park at the Site has been considered. The NPPF is clear that compensatory improvements to the environmental quality and accessibility of remaining Green Belt land can be considered when undertaking Green Belt release.
- 6.9 Overall, as detailed further in Chapter 7 of this Representation, it is considered that Land off Wrottesley Park Road makes a 'moderate' contribution to the purposes of the Green Belt, rather than the 'high' contribution identified within the Green Belt Assessment.
- 6.10 In respect of other aspects, the site was only found to have 'moderate/moderate-high' landscape sensitivity or a 'minor negative' impact on landscape character, views from the public right of way network, views for local residents, urbanisation of the countryside and coalescence).
- 6.11 The finding that the site would have a Major Negative impact upon landscape and townscape accordingly appears to be based upon the finding that the site would result in a 'high' level of harm to the Green Belt. This 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.
- 6.12 It is contended that the SA impact score for Landscape and Townscape

⁷ South Staffordshire Green Study: Stage 1 and 2 Report (July 2019) LUC.

should duly be tempered to a Minor Negative ('-') score.

- 6.13 In respect of education, the site is identified as scoring a Major Negative ('--') against education. This is due to the fact that the site is located "*...outside the target distances for primary and secondary schools*"⁸.
- 6.14 In response to the above, Richborough Estates has amended the illustrative proposal to include land for a new primary school. This land is located to the southern extent of the site, immediately adjacent to the safeguarded land which is to be allocated through the LPR. This proposed primary school could accordingly serve both sites, as well as other existing neighbouring homes.
- 6.15 It is considered that this represents a significant benefit of allocating Land off Wrottesley Park Road and should accordingly be reflected in the next iteration of the Sustainability Appraisal.
- 6.16 Regarding access to secondary schools, the Technical Note prepared by Hub sets out how discussions have taken place with SCC regarding potential new walk/cycle links to provide more direct linkages through the housing estate to the east. The links from the site would be encouraged by means of suitable crossing facilities of Wrottesley Park Road. In turn, this will facilitate access to busses on The Parkway at a walk of less than 1km from the Site, which provide regular services to and from Wolverhampton, from early in the morning (05:58) to late in the evening (22:45).
- 6.17 The site is therefore considered capable of providing access to both primary and secondary schools, and should accordingly score a Minor Positive ('+') score in respect of education.

⁸ 800m for travelling to a primary school and 1.5km to a secondary school, as per Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010.

7.0 Land off Wrottesley Park Road, Perton

Site Description

7.1 Richborough Estates has current land interests in land at Wrottesley Park Road, Perton. The site is located to the west of Wrottesley Park Road and to the north and immediately adjacent to housing allocation and safeguarded site ref: 239 contained within the adopted Site Allocations Document (SAD).

7.2 Land at Wrottesley Park Road comprises a number of field parcels is currently in agricultural use which total approximately 45.9 hectares. The parcels of land are subdivided by existing tree/hedgerow boundaries associated with the agricultural use of the land. The parcels are accessed via Wrottesley Park Road to the east or via a private road to the north.

Green Belt

7.3 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.

7.4 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

7.5 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

7.6 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.

7.7 However, the Study considers that this includes those settlement areas deemed close enough to the 'core' urban area for development associated with those settlements to be considered to be part of the '*large built-up area*'. Perton is stated to be one of these settlements.

7.8 Richborough Estates objects to this inclusion. Perton is of sufficient size and boasts a separate identity sufficient to be considered separate to the West Midlands Conurbation.

7.9 The parcels of land which separate Perton from the West Midlands Conurbation⁹ are assessed within the Green Belt Study and are, on the whole, identified as making a lesser contribution towards Green Belt Purpose 1. This is as a direct result of the Council’s consideration that Perton forms part of the West Midlands Conurbation. Given that Perton should be considered separate to the West Midlands Conurbation, these parcels of land in fact serve a far greater purpose in checking the unrestricted sprawl of the built-up area. This should be reflected in the Council’s Green Belt Study.

Land at Wrottesley Park Road; Contributions to Green Belt Purposes

7.10 The Green Belt Study shows Land off Wrottesley Park Road, Perton, as falling within Green Belt Sub-Parcel reference: S54B – ‘*Perton Park/Cranmoor/Wrottesley Park*’, which is identified as making the following contribution to the five purposes of the Green Belt:

GB Purpose	Assessment	Rating
P1: Checking the unrestricted sprawl of large built-up areas	Land is close or adjacent to the West Midlands conurbation, contains no significant urban development, and has strong openness. It retains a stronger relationship with the wider countryside than with the urban area.	Strong
P2: Preventing the merging of neighbouring towns	Land plays no significant role due to the distance between the West Midlands conurbation and Albrighton, the nearest town to the west.	Weak / No contribution
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (i.e 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	Land does not contribute to the setting or special character of a historic town	Weak / No contribution

⁹ Green Belt Parcels: S46A, S56A, S57A, S58A and S59D.

of historic towns		
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 S54B Contribution Towards Green Belt Purposes

7.11 The Study goes on to identify that, should Green Belt Sub-Parcel ref: S54B be released for development, the resulting harm would be 'high', stating:

"The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. This part of the sub-parcel directly adjoins the settlement of Perton. The expansion of Perton into the sub-parcel would result in a weaker Green Belt boundary than that formed by Wrottesley Park Road and tree cover along the golf course boundary that forms a boundary to land released for existing development allocations. Therefore, release of this part of the sub-parcel would constitute a limited weakening of the Green Belt. Loss of openness between Perton and Nurton/Old Perton would weaken distinction between the two, but would not increase overall harm."

land, meaning development would not extend any further westward into the countryside.

7.14 The site is bounded to the north by woodland, containing the site both physically and visually within the wider landscape whilst providing a strong boundary to restrict future development. It is clear that the site has defensible boundaries on all sides and would form a natural extension to the existing urban area and as such, the site is not required to check the unrestricted sprawl of the existing built-up area.

7.15 Lastly, the provision of a country park to the western portion of the site would serve to restrict the sprawl of the built-up urban area in the long-term.

7.16 It is therefore considered that the site makes a 'moderate' contribution to checking the unrestricted sprawl of large built-up areas, rather than the 'strong' contribution identified within the Green Belt Study.

To Prevent Neighbouring Towns from Merging into One Another

7.17 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 Perton and the nearest settlement of Patteringham to the west due to the distance of over 3km. As such, the development of the site would not result in the merging of neighbouring towns and would maintain the functions and separation of the Green Belt in this location. There are opportunities for the strengthening of the boundary at the interface with the wider landscape to the west which could provide increased physical and visual separation and a soft edge to development to further reinforce the edge.

7.18 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

7.19 Whilst the site contains some characteristics of open countryside, such as an absence of built development, it remains that the site has durable defensible boundaries that are afforded clear physical enclosure from the wider Green Belt. Furthermore, due to the existing uses that surround the site, its development would prevent further encroachment into the countryside. Whilst these boundary hedgerows are in place, they are degraded and gappy in places. 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 west.

7.20 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

7.21 Perton is not a historic town. The site is situated away from the Conservation Area and there are no views towards any heritage assets from within the site area. As such the removal of the site from the Green Belt would not affect the purpose of preserving the setting and special character of a historic town.

7.22 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

7.23 Whilst it is acknowledged that all Green Belt land makes a contribution towards encouraging the recycling of derelict and other urban land, the site and immediate area does not contain significant areas of brownfield land and would therefore not prejudice the redevelopment of urban land in this area.

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.

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

Summary of Green Belt Purposes

7.25 Overall, it is therefore considered that Land off Wrottesley Park Road, Perton, 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: S54B. This contribution is summarised in the table below:

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

Table 7.2: Land off Wrottesley Park Road, Green Belt Assessment

Compensatory Improvements

7.26 Paragraph 142 of the NPPF confirms that, when releasing Green Belt land for development, local plans should '*... set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining*

Green Belt land’.

- 7.27 As set out within the accompanying Vision Document (see **Appendix 3** to this representation) a country park delivered at Land off Wrottesley Park Road would remain in the Green Belt and would serve as an enduring defensible boundary in the long-term, beyond the plan period. In particular, the country park would provide an opportunity to give residents access to the wider Green Belt and a significant area of green infrastructure with potential to link to the wider public Right of Way network beyond. The Illustrative Masterplan included within the Vision Document indicates that the country park could provide a number of environmental and accessibility benefits, including: a café/visitor centre, a community orchard, an informal sports area, an equipped play area, natural play areas, a picnic area, wildflower meadows, heathland areas, formal and informal walking routes and connectivity to wider public right of way network.
- 7.28 These benefits should be considered when assessing overall Green Belt harm.

Green Belt Harm

- 7.29 Given the reduced impact upon the five purposes of the Green Belt and the compensatory improvements set out above, is contented that the Green Belt harm identified within the Study should be reduced from ‘high’ to ‘low-moderate’.
- 7.30 It is the view of Richborough Estates that the site makes a moderate contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. The expansion of Perton into the site would serve to facilitate the delivery of a new country park, which would result in a stronger Green Belt boundary than that formed by Wrottesley Park Road. The site would form a logical location for the expansion of the settlement edge, and new Green Belt boundaries could be readily drawn without compromising the functions of the designation. The provision of a new country park in this location would provide compensatory

improvements to the environmental quality and accessibility of the remaining Green Belt land, in accordance with Paragraph 138 of the NPPF.

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

Landscape Sensitivity

7.32 South Staffordshire District Council has produced a Landscape Study (2019) which forms part of the Local Plan Review evidence base. The majority of Land off Wrottesley Park Road falls with Landscape Parcel Reference: SL29S1, with the western edge of the site falling within SL29S2. These two landscape parcels subsequently fall within the 'Settled Farmlands' Landscape Character Type. The landscape areas are located west of Perton and Wightwick (Wolverhampton), and include a narrow strip of land which separates the two settlements. The southern boundary is formed by the A454, the eastern boundary by the settlement edge, and the south western boundary by Pattingham Road. Nurton Brook forms the western boundary, and the northern boundary is formed by field boundaries. The area incorporates Perton Park Golf Course.

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

Characteristic / Attribute	Lower Sensitivity to Development	Moderate Sensitivity to Development	Higher Sensitivity to Development
Scale	Fields separating Perton and Wightwick are smaller in scale with outgrown hedges or fenced boundaries and generally used for horse grazing. As the gap between the	The area is dominated by regular medium to large scale arable fields divided by mature trimmed hedgerows with occasional hedgerow and in-field trees.	

	settlements narrows to the west, it is characterised by scrubby woodland.		
Landform	The landform is very gently undulating, with elevations between 100m and 140m AOD. To the west of Perton the landscape rises to the west before descending to Nurton Brook. To the south, the landform is a gentle slope enclosed by a more pronounced scarp slope south of Pattingham Road.		
Landscape pattern and time depth		Field patterns are mixed in origin and include 19th century reorganised piecemeal enclosure, 18th/19th century semi-planned enclosure, as well as post-war amalgamated fields.	
'Natural' character		Priority habitat deciduous woodlands near Cranmoor and tree belts along the Staffordshire Way are identified as Ancient Woodland. The remaining woodland is predominantly coniferous, including planting within the Perton Park Golf Club. Natural features of value include the mature	

		hedgerow and occasional in-field trees.	
Built character	Built features are limited to a number of modern farms and properties along Pattingham Road and within the golf club.	A limited number of historic features important to landscape character including Trinity Cottage and a dovecote associated with South Perton Farmhouse which are Grade II Listed.	
Recreational character	A large part of the area is within Perton Park Golf Club which provides restricted recreational opportunities.		The promoted long-distance Monarch's Way passes through the west of the area. Two footpaths cross the narrow strip of land between Wightwick and Perton.
Perceptual aspects	The golf course introduces an urbanised element to the landscape.		The north and west of the area has a strongly rural character and reads as part of the wider countryside, becoming particularly tranquil with an experience of 'dark skies' away from the settlement edge.
Settlement setting	Coniferous plantation at Perton Golf Club provides enclosure to the south west of the settlement reducing its sensitivity.	The area provides a rural setting to Perton and ribbon development along Pattingham Road extending from Nurton. However, settlement on the edge of Perton is	The settlement edge of Wightwick is looser and more rural in character than the southern settlement edge of Perton. The two settlements are separated by an

		generally inward looking and Wrottesley Park Road provides an abrupt edge to the settlement.	increasingly narrow buffer of open green space which has an important role in preventing coalescence.
Visual prominence	The landscape is not visually prominent within the wider landscape due to its gently undulating topography and large areas of woodland which provide enclosure.	The rising topography to the north west of the area and the stream valley sides along the Nurton Brook are visible within the wider landscape.	
Inter-visibility with adjacent designated landscapes or promoted view points	There is no inter-visibility with any designated landscapes or marked viewpoints.		
Landscape Sensitivity Judgement (SL29S1)	The landscape is considered to have a moderate overall sensitivity to residential development. The narrow buffer of open agricultural land between the southern settlement edge of Perton and Wightwick has a particular sensitivity due to its role in preventing coalescence between the settlements.		Moderate
Landscape Sensitivity Judgement (SL29S2)	The increasingly rural and wooded landscape to the north and west of the area at Cranmoor and along the Nurton Brook, is more sensitive to residential development due to its stronger natural character and visual prominence.		Moderate-high

7.34 The Study concludes that Landscape Parcel SL29S1 (which encompasses the whole of the developable area of Land at Wrottesley Park Road) is considered to have a 'moderate' overall sensitivity to residential development, as identified on Figure 7.1 overleaf.

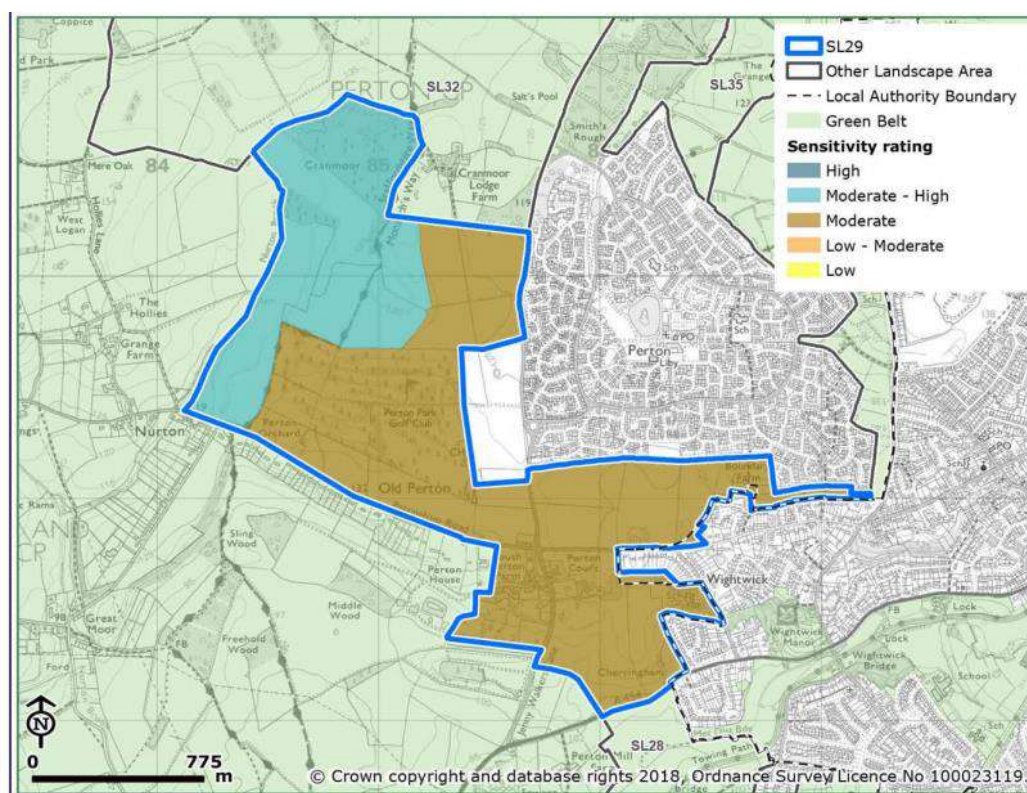


Figure 7.2: Landscape Sensitivity Rating Parcels SL29S1 and SL29S2

- 7.35 The findings of the Landscape Study are not necessarily disputed by Richborough Estates. However, the site has previously been assessed through the Site Allocations Document process as having a 'low impact' on landscape sensitivity. It is, therefore, not understood how the landscape sensitivity of the site has increased, particularly now land to the south (Site Allocation Ref: 239) has been allocated for residential development.
- 7.36 Nevertheless, it is considered that the development of the site for residential purposes represents an opportunity to strengthen existing field boundaries within and to the edges of the site. Furthermore, the development of the site facilitates the opportunity to provide a new country park, which would serve to define the western edge of Perton.
- 7.37 The county park would be partly located within the area of greater landscape sensitivity (parcel SL29S2) and would contribute towards the natural rural

character of the land, easing the transition between the urban edge and the countryside in this location.

- 7.38 Initial work undertaken by EDP has revealed that there are no 'in principle' constraints to the development of housing at the site with regard to landscape. The site does not fall within close proximity to any nationally designated landscapes or sites of nature conservation importance.
- 7.39 The general visual baseline of the Study Area – that is the distribution and availability of both internal and external intervisibility – is heavily influenced by topography, existing woodland cover or other landscape features and existing settlement both within the site and in the immediate locality. The interaction of topography, woodland cover and built form restricts the size of the area from which views of the site are possible to the north, east and south to within a relatively close range (i.e. resulting in a high degree of visual containment). The land has a strong relationship to the settlement edge of Perton, particularly further to the east of the site, where topography screens this area of the site from the west.
- 7.40 The site consists of six arable fields bordered by low hedgerows and scattered mature oak trees that give it a relatively simple landscape fabric and an open character. There are few intrinsically valuable landscape features and the fabric is considered to have a low sensitivity to change, provided that the retention of the majority of trees and key hedgerow connections can be achieved, which has been inherent when developing the proposals.
- 7.41 The illustrative masterplan for the site (see **Appendix 1**) 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. The proposals also provide a significant opportunity to improve the legibility of the Staffordshire Way.

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;
- Retail Centres Study
- Access to employment locations;
- Access to education facilities; and
- Public transport access to higher order services outside of the village.

7.44 Perton is identified as falling within 'Tier 2 Settlements' which are described as:

"Settlements within this tier typically have a food store and a range of services and facilities and education establishments, but the level of provision will typically be less than Tier 1 villages. These villages do not have access to rail stations and have lesser levels of employment access than Tier 1 villages. There is still a degree of access to services outside the village via public transport."

7.45 The overall settlement hierarchy scoring for Perton 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	

Figure 7.4: Settlement Hierarchy Scoring for Perton, RSFA (2021)

7.46 Whilst the identification of Perton as a Tier 2 Settlement is not disputed overall, Richborough Estates considers that Perton benefits from 'medium' access to employment opportunities, rather than 'low' as identified within the RSFA.

7.47 The RSFA assesses access to employment locations through 'Hansen' scores, which measures the number of destinations that can be accessed within a 60 minutes journey time, the disbenefits of travel in terms of journey time, origin point population and the total number of jobs available at the destination. This is calculated using a digital model.

7.48 Whilst the detailed modelling is not available for scrutiny as part of this consultation, it remains that Perton benefits from frequent bus services to Wolverhampton (the number 10 service), operating approximately every 15-25 minutes from 6am until 7:30pm, whereupon they become hourly until 10:45pm. The journey time between Perton and Wolverhampton is scheduled as taking 29 minutes. In the context of the Hansen scoring identified within the RSFA, that leaves an additional 31 minutes to make an onward journey to an employment destination.

7.49 Whilst this represents a simplification of the modelling that appears to have been utilised by the Council, it remains that Wolverhampton is the largest

settlement adjacent to Perton (and indeed, South Staffordshire District), both in terms of total number of jobs offered, but also the diversity of jobs offered. It is therefore not understood how Perton could be said to have 'low' access to employment locations.

Impact on the Historic Environment

- 7.50 Richborough Estates commissioned CgMs to prepare a heritage report, which draws together the available archaeological, historic, topographic and land-use information in order to clarify the heritage significance and archaeological potential of land proposed for development.
- 7.51 The assessment establishes that there are no designated heritage assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Battlefields, Registered Historic Parks or Conservation Areas) within the study site, and that development of the study site will not affect the significance of any designated heritage assets, nor their settings, in the surrounding area.
- 7.52 Heritage Gateway depicts two non-designated heritage assets within the site, which include two north south aligned field boundaries that are shown on a map of Perton Manor dated to 1663 (MST18002) and a track way dated to the same period. The work undertaken to date however, has identified that these would not be a constraint to development within the site or require to be designed around. This assessment has also established that the site has a negligible potential for significant (non-agricultural) archaeological remains of all periods.
- 7.53 In summary, the technical work undertaken to date concludes there are therefore no heritage constraints to the allocation of the site for residential development.

Surface Water Flooding

- 7.54 Richborough Estates has commissioned a technical review of the flood risk and drainage issues, produced by BWB. The report identifies that the site lies within Flood Zone 1; less than 1 in 1,000 annual probability of river or sea flooding. Surface water flood mapping indicates the potential for pluvial flooding along the northern boundaries of the site, however, this is anticipated to be managed and mitigated as part of the development proposals and drainage strategy.
- 7.55 OS Plans and an initial site walkover would suggest a system of ditches and drains exists flowing north along Wrottesley Park Road towards the roundabout and ultimately to the River Penk. As part of the detailed Flood Risk Assessment, investigations would be made to verify a surface water outfall.
- 7.56 With such mitigation measures in place it is considered that flood risk to and from the development will be managed and betterment will be provided by the development.
- 7.57 Underlying bedrock is designated as Principal Aquifer and superficial deposits as Secondary Aquifer by the Environment Agency. This information indicates there is potential for soakage on site and therefore detailed soakage testing will be completed as part of any Flood Risk Assessment.

Highways (Accessibility to the Site)

- 7.58 The site is sustainably located, and a range of local facilities are accessible by modes other than the car. Shared foot/cycle way provision and two new pedestrian points of access could be proposed into the village from Wrottesley Park Road, ensuring the sustainable access to and from the site will be excellent.

- 7.59 Vehicular site access can be provided in accordance with relevant local and national design guidance onto Wrottesley Park Road, ensuring there would be no material impact on highway safety or highway capacity as a result.
- 7.60 Richborough Estates has undertaken further work in respect of transport and has assessed the traffic generation impacts of proposals for 750 dwellings on land at the western edge of Perton (which is assumed to include the sites at Wrottesley Park Road and other sites contained within the adopted Local Plan). The results show that the junctions in the vicinity of the site have sufficient capacity to accommodate 750 dwellings, with the exception of the A41 Holyhead Road/ Wrottesley Park Road/ Heath House Lane junction which is predicted to operate over capacity during the PM peak period. The junction already operates over capacity in 2016 base year.
- 7.61 An initial potential strategy has been developed to improve the operation of this junction, focussed on increasing the capacity of the two A41 approach arms. The assessment with this improvement shows that the junction will operate within capacity during the AM and PM peak periods and also shortens the cycle time to 90 seconds.
- 7.62 In summary therefore, this strategic work demonstrates that the development site can be delivered on the highway network with the improvements required being deliverable within highway land.
- 7.63 In addition, consideration has been given to the provision of new pedestrian linkages between the site and existing built up area of Perton. Land to the east of Wrottesley Park Road has been secured to enable pedestrian linkages to be provided, offering accessibility to services and facilities on foot.

Impact on Current Land Use

- 7.64 The agricultural land contained within this site is believed to be a mixture of Grade 3 (split of 3a and 3b is unknown at this time), and Grade 2 (which is land of best and most versatile value).

7.65 However, the same is true for the majority of land around Perton and therefore does not reflect negatively against this site.

Impact on Natural Environment

7.66 Initial work undertaken by EDP has revealed that there are no 'in principle' constraints to the development of housing at the site with regard to ecology. There are no statutory sites of nature conservation importance at an international (e.g. Special Areas of Conservation) or national (e.g. Sites of Special Scientific Interest) scale located within a 5km radius of the site.

7.67 The site consists predominantly of arable land with a network of hedgerows and occasional hedgerow and field boundary trees. The network of hedgerows and any notable trees have been, and will continue to be, sought to be retained within any proposals and the site offers opportunities for such networks to be enhanced.

7.68 From the initial work undertaken, there is a low overall diversity of habitats on the site and those that it does support are common and widespread within the local landscape. Therefore, it is considered that the ecological value of the site is limited.

7.69 There are considerable opportunities for biodiversity enhancement through habitat creation given that it proposes a significant area of open space both within the development area and the proposed Country Park. The creation of new habitats should be designed to contribute towards targets set within the UK and Staffordshire Biodiversity Action Plan. The scheme specifically has the opportunity to contribute to the targets for the following BAP habitats: lowland wood and pasture/parklands; lowland acid grassland; ponds and lakes; reedbeds; wildflower meadows; and biodiverse architecture.

Impact on Environmental Quality

7.70 The agricultural site is unlikely to have significant issues in relation to contamination, and the surrounding context of the site is not considered to represent constraints in relation to air quality and noise.

7.71 Whilst it is accepted that development is unlikely to improve the environmental quality of the site as there are no existing issues of contaminated land, development would not give rise to any further environmental quality issues.

Site-Specific Opportunities

7.72 As set out previously within this Representation, the development of the site for residential purposes presents the opportunity to deliver a new country park at Perton, which has previously been identified within the Council's Infrastructure Delivery Plan as a future project.

7.73 Further detail in respect of the country park is provided within the accompanying Vision Document, included at **Appendix 3** to this Representation.

7.74 This represents a significant benefit of allocating Land at Wrottesley Park Road, Perton, for residential development. The development of the site could also deliver:

- Delivery of up to 300 dwellings to include market and affordable homes and a mix of property types aligned to local needs;
- Provision of land for a new primary school to serve both the Site and the safeguarded land to the south;
- Strong Green Belt boundary provided utilising existing trees and

hedgerows;

- New residential links provided to wider residential areas and Perton Centre to maximise connectivity and encourage sustainable trips;
- Provision of a network of green links and corridors and provision of equipped play;
- Delivery of a new Country Park to serve Perton that connects into the Staffordshire Way;
- Retention of existing field pattern;
- Provision of a new visitor centre/café ancillary to the Country Park;
- Increased biodiversity and wildlife habitats, including incorporation of Sustainable Drainage Systems (SuDS);
- Creation of new, enduring Green Belt boundary and provide opportunity to provide recreational access, enhanced landscapes and increased biodiversity.

Suitability

7.75 The information set out above demonstrates that Wrottesley Park Road is a suitable site for development.

Deliverability

7.76 There is an agreement in place between the landowner and Richborough Estates to facilitate the development of the site.

-
- 7.77 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.
- 7.78 There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the impacts identified by the Council through the assessment of the site can be mitigated and, in many cases, a positive outcome can be achieved.
- 7.79 The site is deliverable and immediately available and, subject to allocation, could deliver homes and associated community benefits within the next 5 years.

8.0 Conclusion

- 8.1 This representation is made by Pegasus Group on behalf of Richborough Estates Limited to the South Staffordshire Local Plan Review, Preferred Options (Regulation 18) consultation. This representation relates to land at Boscomoor Lane, Penkridge, which Richborough Estates is promoting for residential development.
- 8.2 Richborough Estates is supportive of the Local Plan Review overall. However, it does not support the failure to allocate Land off Wrottesley Park Road Perton, on the basis of surrounding highways capacity and access to education.
- 8.3 The Technical Note prepared by Hub appended to this Representation demonstrates that not allocating the site due to concerns over the A41 junction is unjustified.
- 8.4 It also sets out how most facilities within Perton Village are within a 1km or so walk of the proposal site including; a first school, public houses, restaurants, medical centre, pharmacy, dentist, optician, Sainsbury supermarket, library, vets, and post office. Buses can be access on The Parkway at a walk of less than 1km. The Perton Primary Academy is within a mile walk of the proposal site.
- 8.5 The site also provides the opportunity to provide a primary school to serve not only the site itself, but also the safeguarded land to the south. This is considered to be a significant benefit to the overall sustainability of the scheme.
- 8.6 The information contained within this representation, read in conjunction with the appended illustrative masterplan, demonstrates that land off Wrottesley Park Road is a suitable and deliverable site for residential development, subject to its release from the Green Belt.

-
- 8.7 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



- Key**
- Application site boundary
 - Open space
 - Indicative surface water attenuation basin
 - Existing (retained) trees & hedgerow
 - Indicative proposed planting
 - Potential for equipped play/LEAP
 - Natural play 'station'
 - Existing Public Right of Way
 - Proposed footpath connector improvements to Parkway Roundabout
 - Proposed hard surfaced pedestrian/cycle link
 - Proposed mown path
 - Indicative development cell
 - Potential primary school site: 15.2ha



APPENDIX 2

Technical Note

Project Number: T19535

Project: Wrottesley Park Road, Perton

Title: Transport Technical Note 2 – LP Review

Date: 08.12.21

Prepared By: Gerard McKinney

Distribution List:

Radclyffe House
66/68 Hagley Road
Edgbaston
Birmingham
West Midlands
B16 8PF

Background

- 1.1 Hub Transport Planning was commissioned by Richborough Estates to provide supporting information in relation to the promotion of land to the west of Wrottesley Park Road, Perton. The proposal site is referred to as site 407 in the SA. Allocated safeguarded land lies to the south of the development proposal and is referred to as site 239 in the SA.
- 1.2 Richborough Estates and Hub Transport Planning Ltd have been in discussion with Staffordshire County Council (SCC) for over two years regarding the potential development and the opportunities for transport mitigation and improvements that could come forward with the allocation of the proposal site.
- 1.3 We understand that SCC are content with the transport merits of site 407 in terms of its impact on the transport network, subject to improvements to the A41/Wrottesley Park Road/Heath House Lane signalled junction and local improvements to active and sustainable travel.
- 1.4 Despite this South Staffordshire Council (SSC) has not allocated site 407 in the current LP Review. The purpose of this note to examine the transport merits of site 407 and to provide evidence as to why the site should be included within the LP.

SSC LP Review Summary

- 1.5 The summary of the SSC SA is provided in tabular form overleaf. The review indicates that all sites assessed are scored with a slight negative on Transport & Accessibility pre-mitigation and post-mitigation.
- 1.6 Our understanding of the proposed 'mitigation' for the traffic signalled junction design ultimately arrived at for the A41/Wrottesley Park Road/Heath House Lane as being suitable to include site 239 amounted to simple alterations to intergreen and overall signal timings at the A41/Wrottesley Park Road/Heath House Lane signalled junction. Such changes are within the gift of SCC without and are not physical improvements.

Technical Note

Pre-Mitigation													Post-Mitigation												
Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment		Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
238	+/-	-	+/-	-	-	-	+	-	-	-	-	-	238	+/-	+	+/-	-	-	-	+	-	-	-	-	
239	+/-	-	+/-	-	-	-	+	-	-	-	-	-	239	+/-	+	+/-	-	0	-	+	-	0	-	-	
241	+/-	+	+/-	-	-	-	+	-	-	-	-	-	241	+/-	+	+/-	-	-	-	+	-	0	-	-	
243	+/-	-	+/-	-	-	-	+	-	-	-	-	-	243	+/-	+	+/-	-	-	-	+	-	0	-	-	
245	+/-	-	-	-	-	-	+	-	-	-	-	-	245	+/-	+	+/-	-	-	+	+	-	0	-	-	
246a	+/-	-	-	-	-	-	+	-	-	-	-	-	246a	+/-	+	+/-	-	0	-	+	-	0	-	-	
260	+/-	+	+/-	-	-	-	+	-	-	-	-	-	260	+/-	+	+/-	-	-	-	+	-	0	-	-	
402	+/-	+	+/-	-	-	-	+	-	-	-	-	-	402	+/-	+	+/-	-	-	-	+	-	0	-	-	
407	+/-	-	-	-	-	-	+	-	-	-	-	-	407	+/-	+	+/-	-	0	-	+	-	0	-	-	
454	+/-	-	+/-	-	-	-	+	-	-	-	-	-	454	+/-	+	+/-	-	0	-	+	-	0	-	-	
504	+/-	+	+/-	-	-	-	+	-	-	-	-	-	504	+/-	+	+/-	-	-	-	+	-	0	-	-	
505	+/-	+	+/-	-	-	-	+	-	-	-	-	-	505	+/-	+	+/-	-	-	-	+	-	0	-	-	
506	+/-	-	+/-	-	-	-	+	-	-	-	-	-	506	+/-	+	+/-	-	0	-	+	-	0	-	-	
705	+/-	-	+/-	-	-	-	+	-	-	-	-	-	705	+/-	+	+/-	-	0	-	+	-	0	-	-	

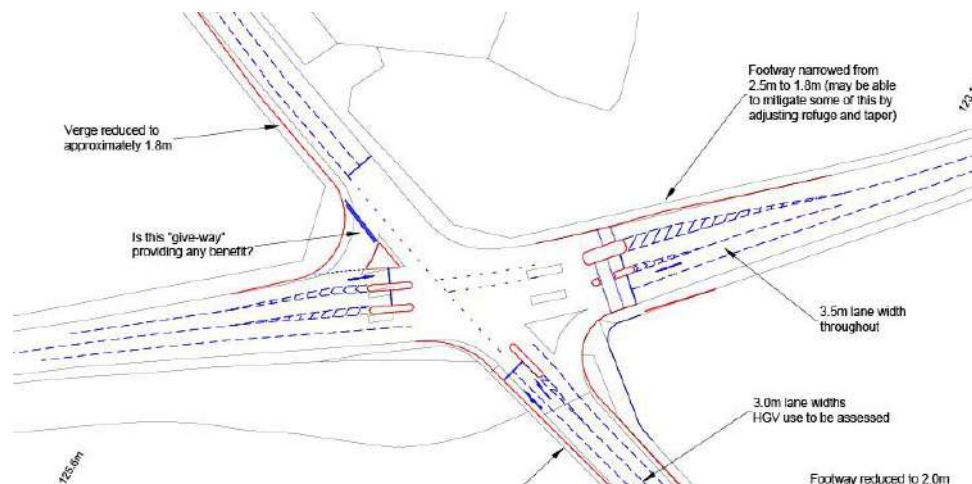
1.7 The SA concludes that allocations at Perton should be limited to the existing safeguarded land;

‘reflecting the lack of a finalised junction improvement scheme at the A41 and the remoteness of Green Belt site options from education facilities’.

1.8 As indicated in the opening paragraphs of this note we have been discussing the proposals at site 407 with SCC for over two years. Transport issues discussed over this period included the following; the operation of the traffic signals at the A41/Wrottesley Park Road/Heath House Lane, active travel routes to local facilities, and public transport services including services to schools.

SCC Proposals at A41/Wrottesley Park Road/Heath House Lane Signalled Junction

1.9 SCC commissioned JCT to provide traffic modelling relating to a proposed improvement scheme at the A41 signalled junction (referred to as Option 2) as indicated in the sketch below.



Technical Note

- 1.10 The modelling of the proposed scheme indicates very real capacity benefits for the junction in the PM peak hour and includes signalled pedestrian facilities not currently provided. The development impact of the proposal site 407 are minimal in the AM peak hour.
- 1.11 We understand that SCC has no objection to the inclusion of site 407 as an allocated site in the local plan on the basis that this junction improvement is in place.
- 1.12 Given that site 239 has previously been allocated with no physical improvements to the junction and offering little or no mitigation at this location, we can see no good highway reason why site 407 should not be allocated subject to a suitable contribution to provision of this scheme. Our understanding is that the scheme will not proceed without developer funding.
- 1.13 It is our view that the post-mitigation situation in relation to site 407, in relation to the traffic signals and taking a balanced view on peak hour operation and likely inter-peak and off-peak operation of the signals, ought to be neutral at worst i.e. an improvement to the current situation.

Distance to Facilities and Potential Mitigation and Improvements

- 1.14 In discussion with SCC a potential new walk/cycle links have been identified to provide more direct linkages through the housing estate opposite. The links from the site would be encouraged by means of suitable crossing facilities of Wrottesley Park Road.

Table 1 - Distance to Local Services

Amenity	Distance
Pear and Partridge Public House	960m
Perton Village Centre (including Medical Centres, Pharmacy, Dentists, Opticians, Sainsbury's supermarket, Library, Vets, Post Office, Parish Council, Petrol Filling Station, Public House and Restaurants)	1.1km
Perton First School	1.1km
Perton Village Nursery	1.1km
Perton Golf Club	1.4km
Perton Primary Academy	1.6km
Perton Middle School	2.0km

- 1.15 Most facilities within Perton Village are within a 1km or so walk of the proposal site including; a first school, public houses, restaurants, medical centre, pharmacy, dentist, optician, Sainsbury supermarket, library, vets, and post office. Buses can be access on The Parkway at a walk of less than 1km. The Perton Primary Academy is within a mile walk of the proposal site.
- 1.16 As such the proposal site 407 is within SSC's suitable walking distance of one mile from first/primary education facilities.
- 1.17 Regardless of meeting the education walking distance criteria for primary education facilities, site 407 can offer the potential for a first/primary school on the land; thus much reducing the walk distances to primary education facilities for residents of the site and for existing and planned neighbouring developments.

Technical Note

- 1.18 SCC has also confirmed that with the improvements planned at the A41 junction and the linkages proposed towards Perton, they are content that the accessibility requirements of the site are met.

Conclusions

- 1.19 SSC's conclusion regarding the non-allocation of site 407 (included at paragraph 1.7 of this report) is not supported by the evidence. Furthermore, the transport and accessibility mitigation and improvements proposed for the site; contribution to works at the A41, new footway/cycleway links and crossings, and a new school on the site, will provide enhancements for users of the transport network beyond just the residents of the proposal site.
- 1.20 Indeed, the highway authority (SCC), has stated that they could not support SSC's exclusion of site 407 from the local plan on transport and accessibility grounds.

APPENDIX 3



LAND OFF WROTTESLEY PARK ROAD **PERTON**

P R O M O T I O N A L D O C U M E N T

Prepared by Pegasus Group on behalf of Richborough Estates
DECEMBER 2021 | BIR.4758_08



Pegasus Group
5 The Priory
Old London Road
Canwell
Sutton Coldfield
B75 5SH
www.pegasusgroup.co.uk | T 0121 308 9570 | F 0121 323 2215

Prepared by Pegasus Group
on behalf of Richborough Estates,
December 2021. Project code BIR.4758. Document ref BIR.4758_08.
Contact: Ben Cook

COPYRIGHT The contents of this document must not be copied or reproduced
in whole or in part without the written consent of Pegasus Planning Group Ltd.
Crown copyright. All rights reserved. Licence number 100042093.





PAGE 5	1	PAGE 9	2	PAGE 15	3	PAGE 33	4	PAGE 37	5	PAGE 41	6	PAGE 45	7	PAGE 49	8	PAGE 53	9
INTRODUCTION & DOCUMENT PURPOSE		PLANNING POLICY CONTEXT		THE SITE AND SURROUNDING CONTEXT		VISION		INDICATIVE MASTERPLAN & DESIGN PRINCIPLES		WEST PERTON		DELIVERABILITY & KEY BENEFITS		COUNTRY PARK		SUMMARY & CONCLUSIONS	

THIS DOCUMENT IS DESIGNED TO BE VIEWED AS A3 DOUBLE SIDED





THE SITE

WROTTSLEY PARK ROAD





INTRODUCTION AND DOCUMENT PURPOSE

INTRODUCTION

1.1 The land at Wrottesley Park Road represents a logical and appropriate extension to the sustainable settlement of Perton. 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 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 located within the Green Belt.
- 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 the most 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 Wrottesley Park Road. The extent of land controlled by Richborough is shown edged red on the Location Plan on Page 6 of this document.

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 2038. 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 to the west of Wrottesley Park Road will form a logical extension to Perton 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 This 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 Overall, this Promotional Document presents a sustainable site to supports the site’s future allocation through the Local Plan Review process and promotes its release from the Green Belt.
- 1.9 This document has been prepared with input from the following Consultant Team:

Planning:
Pegasus Group



Urban Design:
nineteen47



Landscape:
Pegasus Group



Access & Movement:
Hub



Flood Risk & Drainage:
BWB



Heritage:
CgMs







2

PLANNING
POLICY CONTEXT





PLANNING POLICY CONTEXT

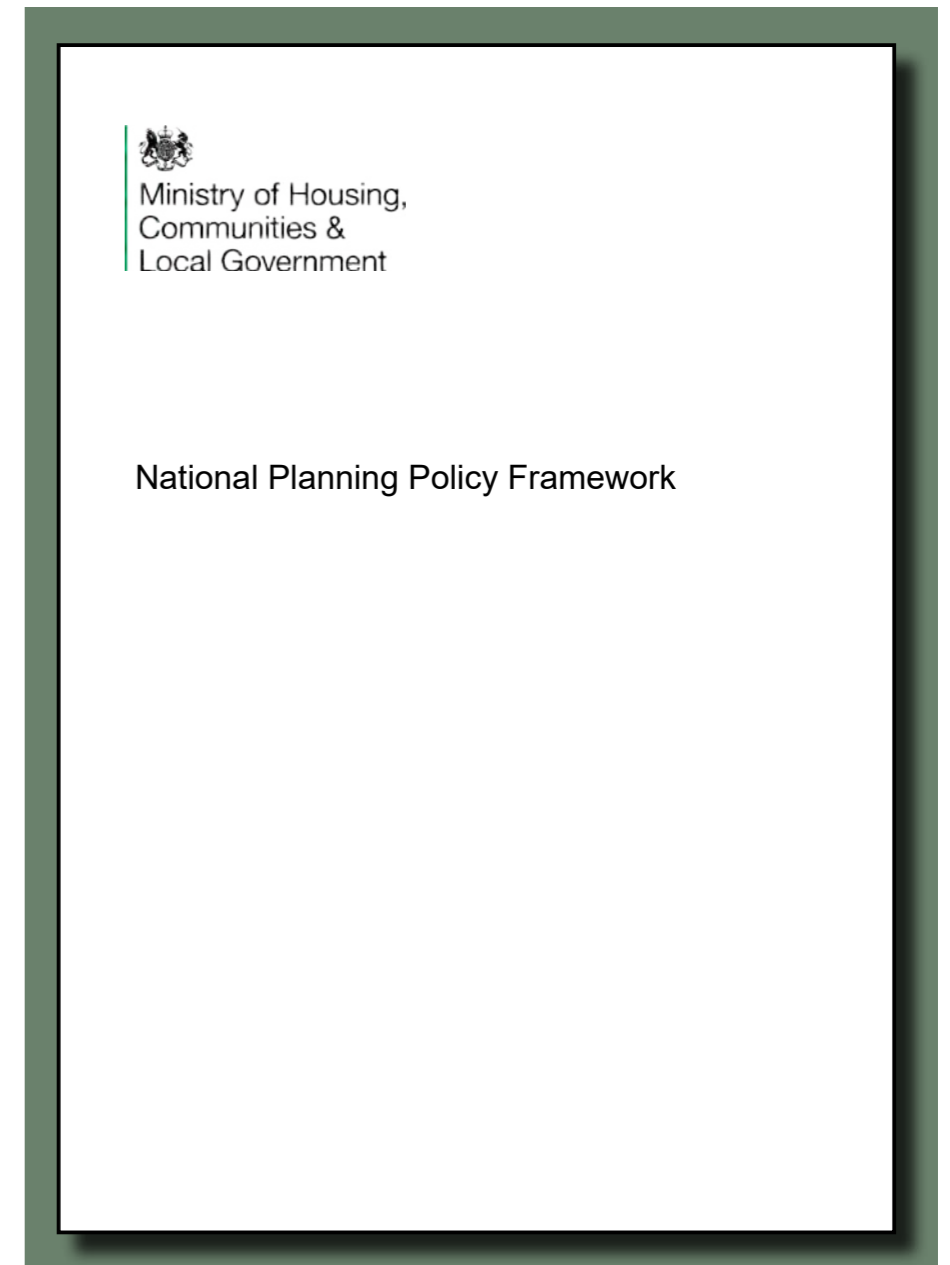
NATIONAL PLANNING GUIDANCE

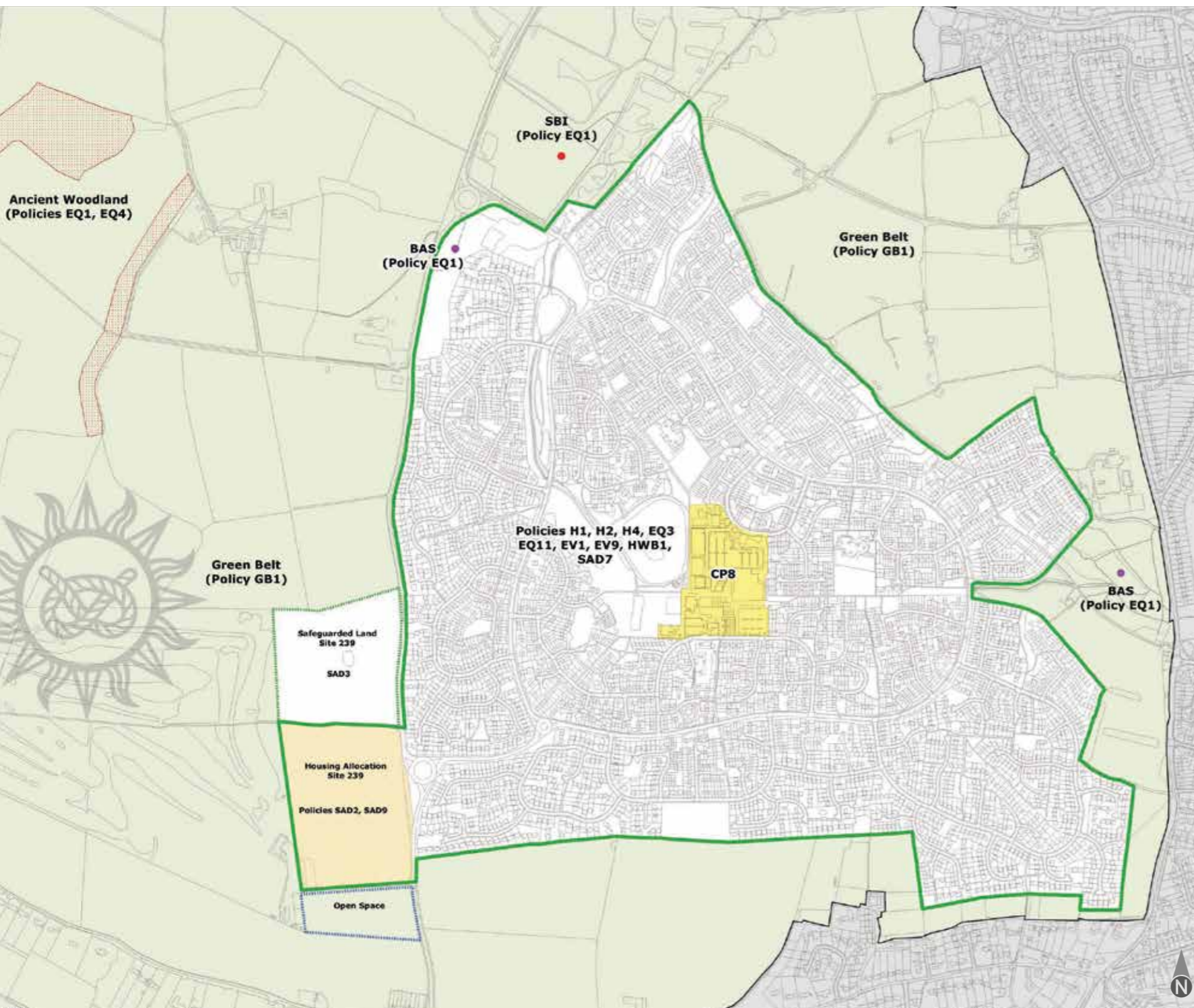
2.1 In 2021, the Government published a revised National Planning Policy Framework (“Framework”) which replaces the previous guidance published in 2018 and 2019 and provides the overarching planning framework for England. Central to the Framework is a presumption in favour of sustainable development (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.

2.2 Paragraph 139 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 138 of the Framework.

2.3 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.

2.4 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 to the west of Wrottesley Park Road, Perton, 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.





ADOPTED LOCAL PLAN POLICIES MAP | NOT TO SCALE

EXISTING DEVELOPMENT PLAN

- 2.5 The Development Plan for South Staffordshire currently comprises the adopted Core Strategy (adopted 11th December 2012) and the Site Allocations Document (adopted 11th September 2018).
- 2.6 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.
- 2.7 The policies map identifies the following designations for the site:
 - Green Belt (Policy GB1)
- 2.8 Perton does not lie within a Neighbourhood Area Designation and therefore a Neighbourhood Plan has not been progressed to date.

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW

- 2.9 The South Staffordshire development plan currently comprises the South Staffordshire Core Strategy (adopted in December 2012) and the South Staffordshire Site Allocations Document (adopted in September 2018). The current Strategy covers the period 2006-2028 and sets a housing requirement of at least 3,850 new homes to be delivered within this period which, at 175 dpa, is considerably lower than the need that has now been identified.
- 2.10 The Site Allocations Document (SAD) commits the District Council to carrying out an early review of the development plan in order to respond to the increasing need for development, both within South Staffordshire and the wider housing market area. The SAD also requires a new Local Plan to be submitted for an Examination in Public (EiP) by 2021.

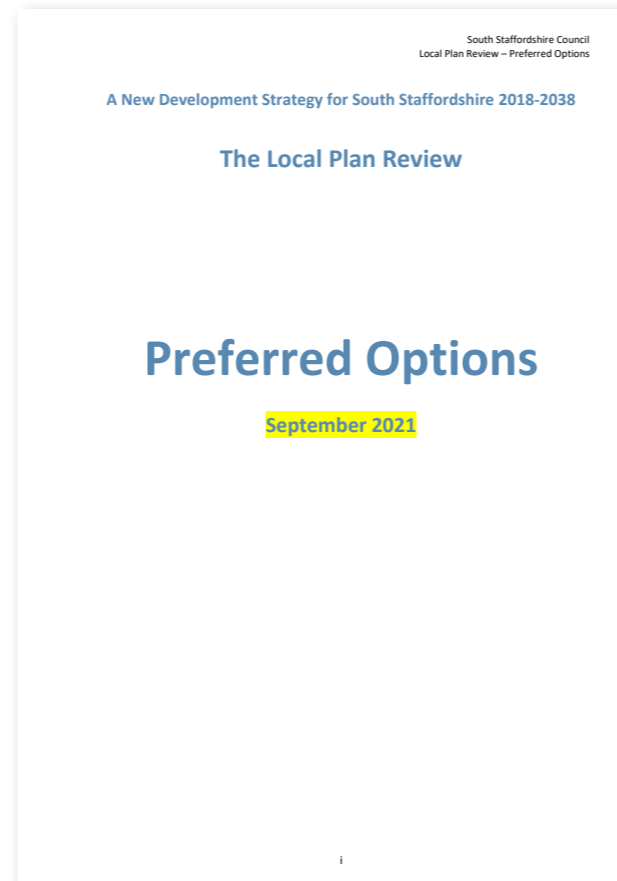
2.11 Richborough Estates supports the District Council's decision to carry out a review to ensure an up to date planning policy framework is in place to shape the District to 2038. The review provides an opportunity to address housing need, reflect new national planning guidance and provide a meaningful contribution to meeting needs of neighbouring authorities, where it can be demonstrated that they are unable to do so.

2.12 The Local Development Scheme (LDS) published in June 2020, proposed the following timetable for the Review:

Issues and Options Consultation	Oct/Nov 2018
Strategic Spatial Strategy and Infrastructure Delivery Consultation	Autumn 2019
Preferred Options Document	Autumn 2021
Publication Document	Summer 2022
Submission of Local Plan	Winter 2022/23
Local Plan Examination	Spring 2023
Adoption of Local Plan	Winter 2023

2.13 Richborough Estates notes that the LDS shows that the Local Plan Review will not be submitted for examination in line with the SAD requirement.

2.14 The draft Preferred Options version of the Local Plan Review is anticipated to begin on 1 November and will run for 6 weeks until Monday 13 December 2021. The Preferred Options document contains an overall housing target of 8,881 dwellings, comprising 4,131 derived from South Staffordshire's own housing need calculated by the Government's Standard Method, 750 dwellings arising from completions in the District since the start of the plan period (2018-2021) and an additional 4,000 dwellings to contribute towards the unmet needs of the Greater Birmingham Housing Market Area.



2.15 A revised Settlement Hierarchy is set out within the Local Plan Review, which highlights Perton as a "Tier 2" settlement. Tier 2 settlements are considered to be some of the most sustainable of the District's villages, with good access to services and facilities. It is concluded that:

"Settlements within this tier typically have a food store and a range of services and facilities and education establishments, but the level of provision will typically be less than Tier 1 villages. These villages do not have access to rail stations, but still have a degree of access to services outside the village via public transport."

2.16 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.

2.17 Perton is completely constrained by Green Belt, with the exception of an area of Safeguarded Land directly south of Richborough Estates' land interests. 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 Perton. 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 Perton to allow for future needs to be met.

CASE FOR GREEN BELT RELEASE

2.18 Given the need to accommodate an increased amount of housing and employment land, the Council concluded there were exceptional circumstances to release Green Belt land through the adoption of the Site Allocations Document. The need to consider Green Belt release through the Local Plan Review process is acknowledged through the Spatial Housing Strategy and Infrastructure Delivery consultation document to support the preferred strategic option for growth. There are exceptional circumstances that exist for the targeted release of Green Belt land in Perton to meet identified housing needs in a sustainable location within this Tier 2 village.





3

THE SITE AND SURROUNDING CONTEXT





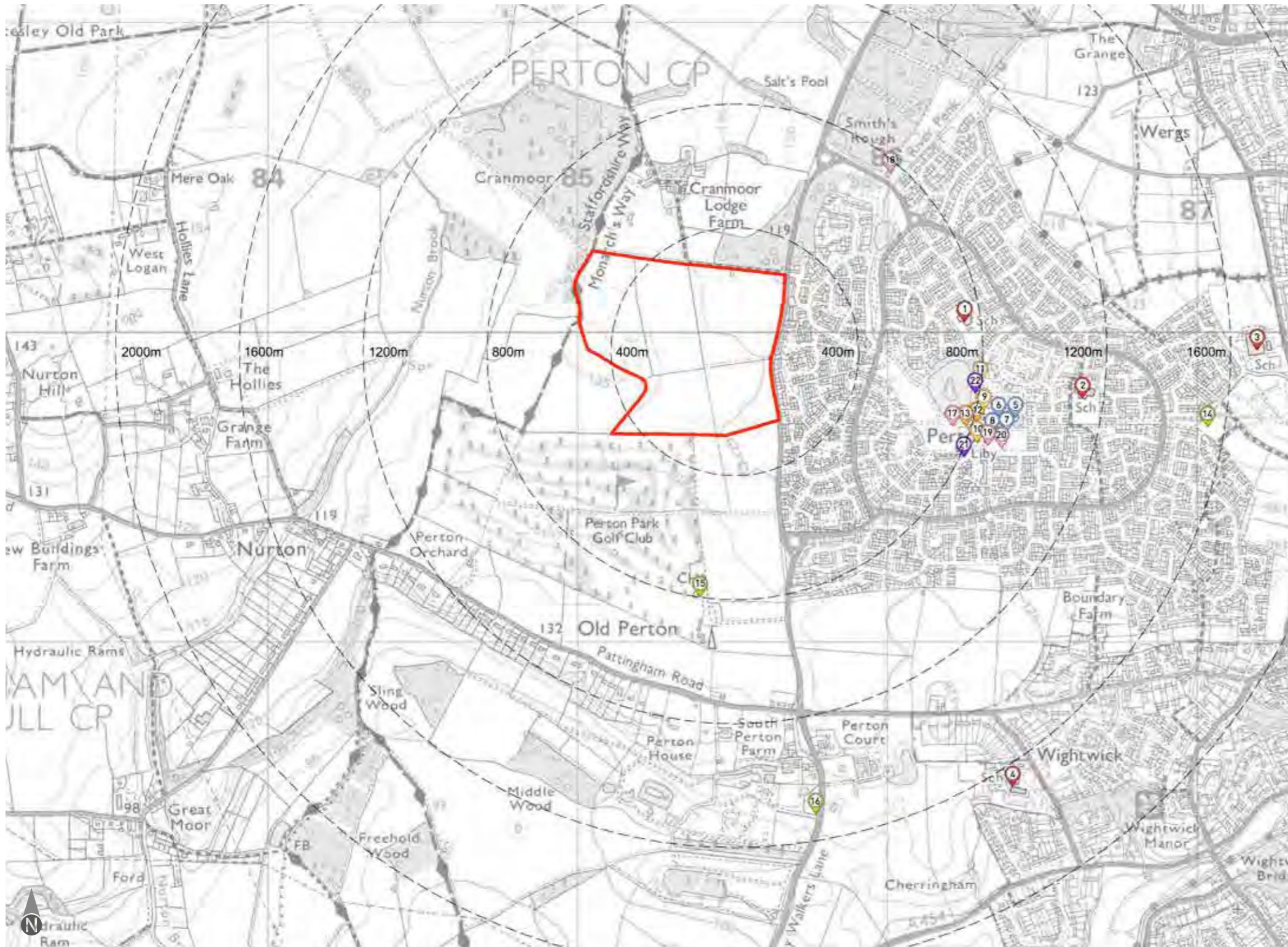
THE SITE AND SURROUNDING CONTEXT

LAND AT WROTTESLEY PARK ROAD

- 3.1 The site is located to the west of Wroottesley Park Road and to the north and immediately adjacent to safeguarded land allocation ref: 239 contained within the adopted Site Allocations Document (SAD).
- 3.2 The site comprises a number of field parcels currently in agricultural use which total approximately 45.9 hectares. The parcels of land are subdivided by existing tree/hedgerow boundaries associated with the agricultural use of the land.
- 3.3 Richborough Estates has secured an interest in this site.

SURROUNDING AREA

- 3.4 The site is located adjacent to the current built up area of Perton with good access to the village centre, including being within walking distance of its many facilities and bus links.
- 3.5 The site also benefits from good access to further services and facilities located within the wider urban area, including Wolverhampton. 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, library, dining and coffee facilities, surgery, dental practice and a range of schools. All of these services can be reached easily by foot from the site.
- 3.6 The site provides an opportunity to deliver much needed housing, together with all necessary supporting infrastructure. Additionally, the site provides the opportunity to deliver a new country park at Perton, resulting in an opportunity for residents to access the wider Green Belt and significant areas of green infrastructure with potential to link to the wider public right of way network beyond.



- Key**
- Site location
- Education**
- 1 Perton First School
 - 2 Perton Primary Academy
 - 3 Perton Middle School
 - 4 Wightwick Hall School
- Shops**
- 5 Sainsbury's/ Sainsbury's Fuel
 - 6 Perton Post Office
 - 7 Martins Convenience Store
 - 8 Taylor's Frozen Foods
- Healthcare**
- 9 Lloyds Pharmacy
 - 10 Tamar Medical Centre
 - 11 Lakeside Medical Centre
- Places of Worship**
- 12 The Church at Perton
 - 13 Lakeside Community Church
- Leisure**
- 14 Perton Pavilion
 - 15 Perton Park Golf Club
 - 16 Tough Guy
- Public Houses & Restaurants**
- 17 Wrottesley Arms
 - 18 Pear and Partridge
 - 19 Flamingo Pink
 - 20 Perton Fish Bar
- Community**
- 21 Perton Library
 - 22 Perton Parish Council

LOCAL FACILITIES | NOT TO SCALE



LOCAL FACILITIES, AMENITIES & SERVICES

- 3.7 There are a number of local facilities within walking distance of the site, with all local facilities listed falling within the suggested 2km upper limited as referenced in Manual for Streets (MfS) guidance.
- 3.8 Both local first schools and one secondary school are located within the (Institute of Highway and Transportation (IHT) maximum walking distance to schools of 2km.

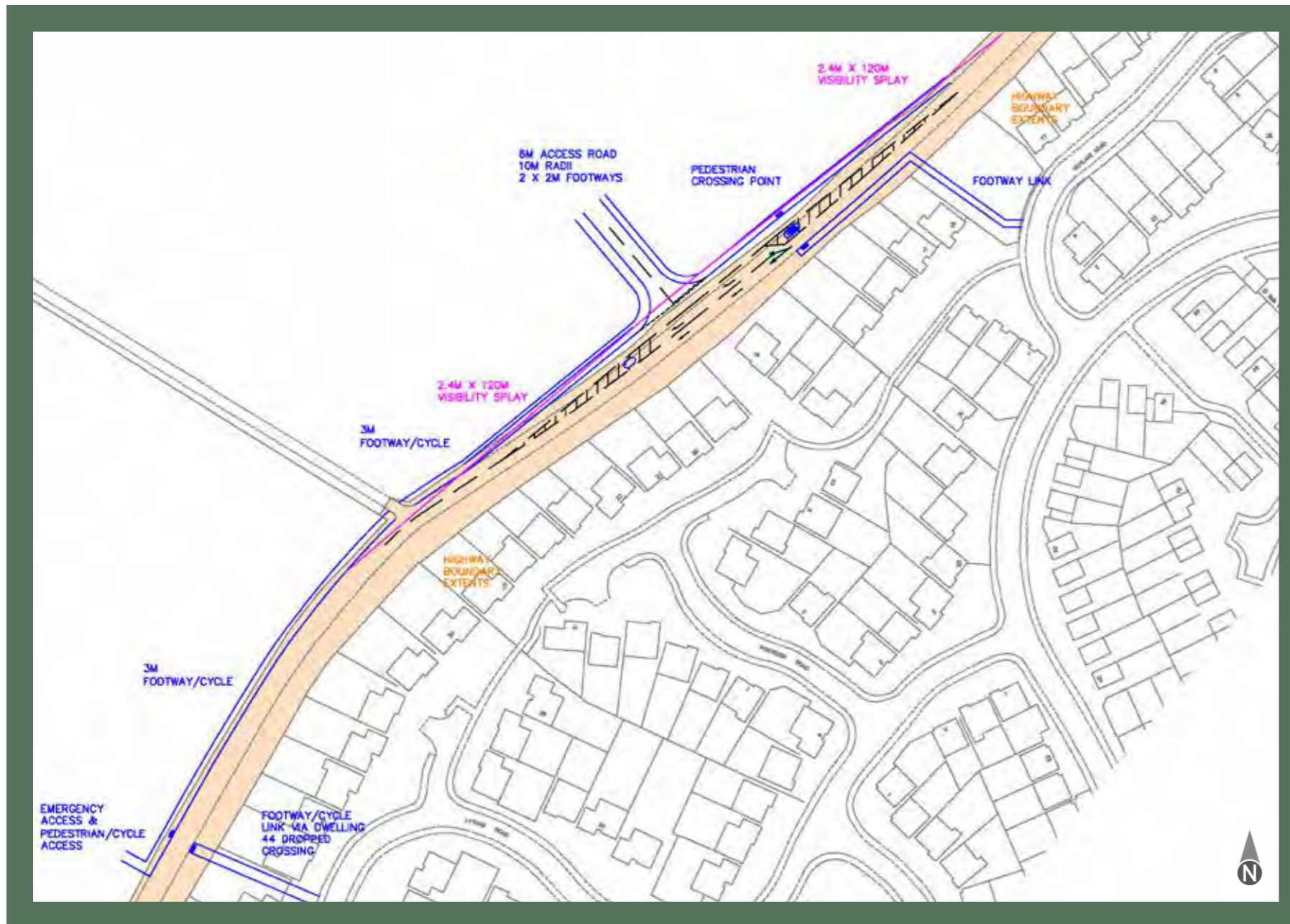
ACCESS & MOVEMENT

LOCAL TRANSPORT NETWORK

- 3.9 Highway (Including Pedestrian Networks): Wrottesley Park Road is the primary local distributor road between the A41 to the North and A454 to the south. The road varies between 6m and 7m wide with grass verges on both sides of the carriageway (the eastern verge being particularly generous in terms of width). The road is reasonably straight and generally provides good forward visibility. The speed limit is restricted to 40mph.
- 3.10 Vehicular access towards the village of Perton from Wrottesley Park Road is taken via two 3-arm roundabouts. The first is approximately 650m to the north of the existing site access on Wrottesley Park Road. The second is 550m south of the site.

- 3.11 Wrottesley Park Road feeds into The Parkway to the East which leads into the village. Pedestrian linkage within the existing residential road network is taken via both footways alongside local roads and off carriageway footpath links. The footways include raised kerbs, street lights, lowered tactile paving at crossings within a 30mph speed limit environment.
- 3.12 Bus: Bus stops are located to the east of the site on The Parkway serving the number 10/10A/10B service. This service is operated by National Express and passes the stop approximately every 15-30 minutes and operates between Wolverhampton and Perton via Compton. It offers access to the village centre (close to the Sainsbury's, the local library and other local facilities and amenities) and to the local schools on its way to Wolverhampton.
- 3.13 Rail: The nearest railway station to the site is Codsall Station, 3.7km to the north off Station Road. The station can be accessed via the 10B bus service which operates from the stops close to the site. Codsall Station offers services to Birmingham New Street (via Wolverhampton) every hour.





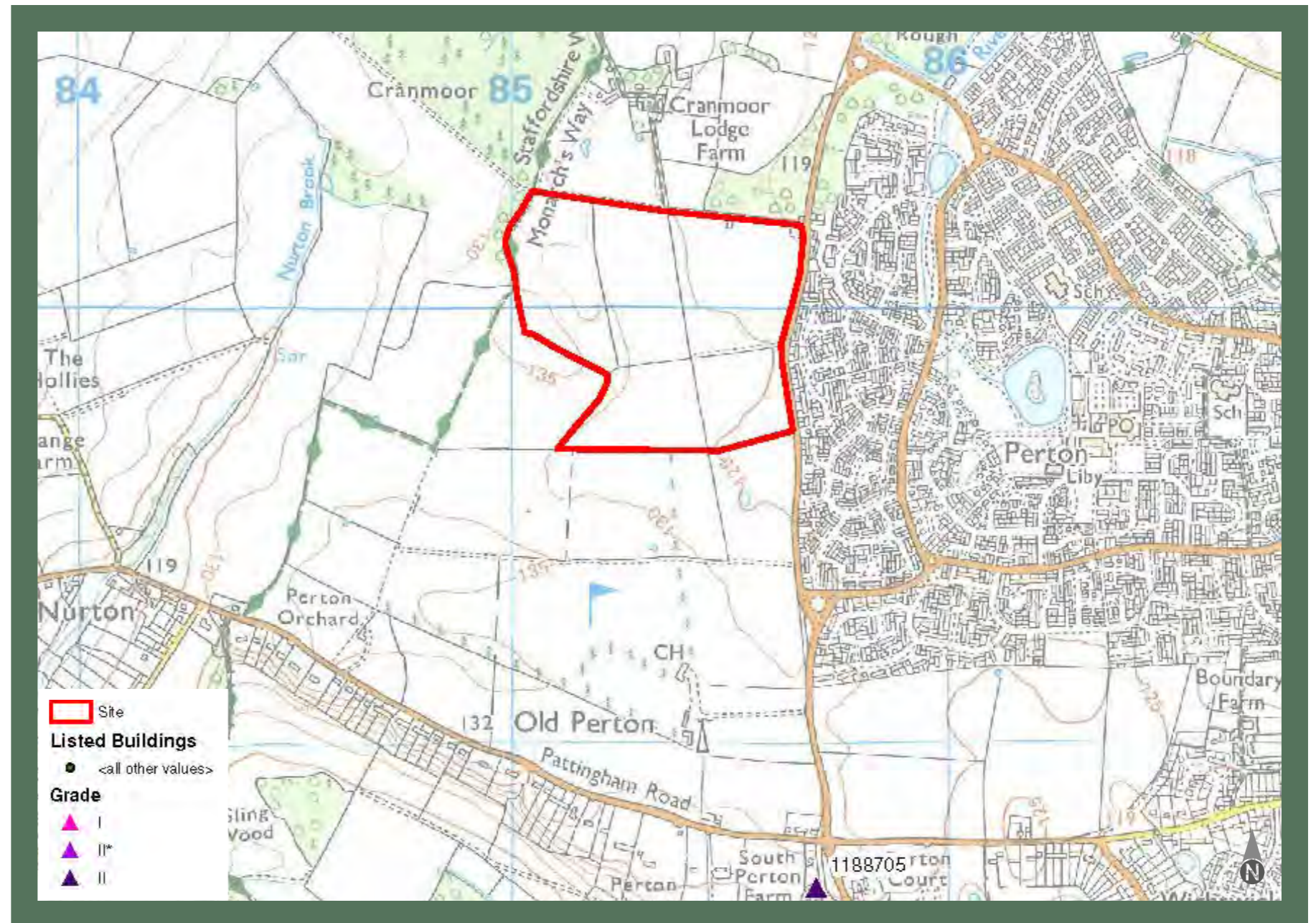
PROPOSED SITE ACCESS | NOT TO SCALE

ACCESS

- 3.14 The nature of the generally straight alignment of the Wrottesley Park Road site frontage provide a range of feasible site access designs. These can be tailored to quantum of development, modified in the longer term as appropriate with land available as necessary.
- 3.15 Current options include: two simple priority controlled T-junctions; a priority ghost island right turn; a single ghost island right turn lane; and a roundabout. Each can be delivered on available land. The appropriate solution can be agreed with the highway authority in due course, but significant flexibility exists and one example is shown on the adjacent plan. Appropriate visibility splays and geometric designs will be delivered in accordance with prevailing design standards supported by traffic data and independent road safety audit.
- 3.16 Footway links are to be secured to the east of Wrottesley Park Road to ensure permeability and encourage sustainable trips to services and facilities available within Perton.

HERITAGE & ARCHAEOLOGY

- 3.17 A Heritage Statement has been undertaken which identifies and considers heritage assets located within the site and within the vicinity of the site. The assessment draws together the available archaeological, historic, topographic and land-use information in order to clarify the heritage impacts and below-ground archaeological potential of the site. This study provides an assessment of the archaeological potential of the site and enables relevant parties to identify and assess the impact of the proposed allocation.
- 3.18 The assessment establishes that there are no designated heritage assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Battlefields, Registered Historic Parks or Conservation Areas) within the study site, and that development of the study site will not affect the significance of any designated asset in the surrounding area.
- 3.19 This assessment has also established that the site has a negligible potential for significant (non-agricultural) archaeological remains of all periods. The site is known to contain post-Medieval agricultural features and may also contain ploughed out structures relating to RAF Perton. These non-designated assets are not a constraint to development and will not require to be designed around.
- 3.20 There are therefore no heritage constraints to the allocation of the site for residential development.



LISTED BUILDINGS | NOT TO SCALE

GREEN BELT

- 3.21 The 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.
- 3.22 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, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land. 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 Vision Document.

CONTRIBUTIONS TO GREEN BELT PURPOSES

- 3.23 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.
- 3.24 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Once established, Green Belts should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating

of plans (NPPF paragraph 136). This Vision Document considers the contribution that land within the site makes to the purposes and function of the Green Belt, with reference to the Council's Green Belt Study. Recommendations are also included for the release of land for development that does not harm the Green Belt and offers options for new boundaries and the enhancement of retained Green Belt land.

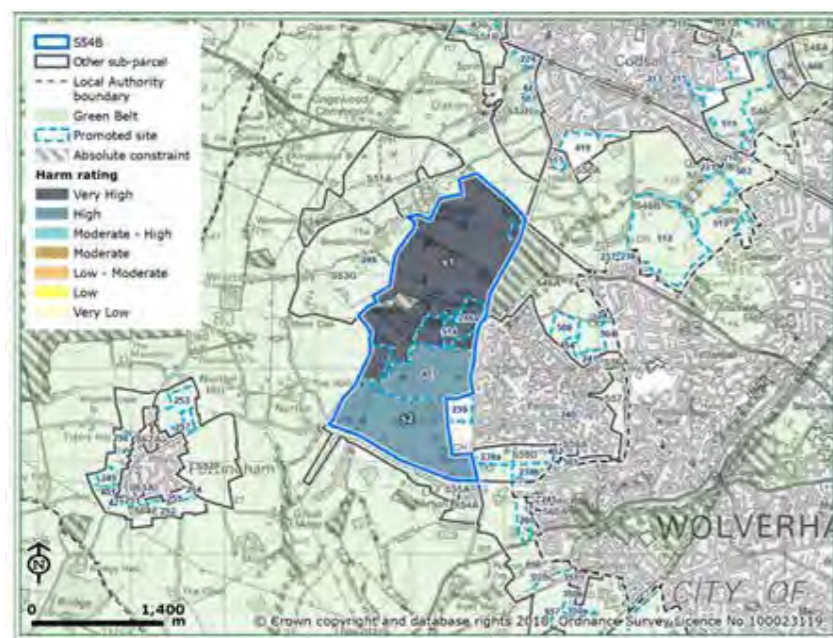
- 3.25 The Council's Green Belt Study shows Land off Wrottesley Park Road, Perton, as falling within Green Belt Sub-Parcel reference: S54B – 'Perton Park/Cranmoor/Wrottesley Park', which is identified as making the following contribution to the five purposes of the Green Belt:

GB PURPOSE	ASSESSMENT	RATING
P1: Checking the unrestricted sprawl of large built-up areas	Land is close or adjacent to the West Midlands conurbation, contains no significant urban development, and has strong openness. It retains a stronger relationship with the wider countryside than with the urban area.	Strong
P2: Preventing the merging of neighbouring towns	Land plays no significant role due to the distance between the West Midlands conurbation and Albrighton, the nearest town to the west.	Weak / No contribution
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (i.e 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

GREEN BELT PURPOSES SUMMARY: PARCEL S54B - PERTON PARK/CRANMOOR/WROTTESLEY PARK

3.26 The Study goes on to identify that, should Green Belt Sub-Parcel ref: S54B be released for development, the resulting harm would be 'high', stating:

“The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. This part of the sub-parcel directly adjoins the settlement of Perton. The expansion of Perton into the sub-parcel would result in a weaker Green Belt boundary than that formed by Wrottesley Park Road and tree cover along the golf course boundary that forms a boundary to land released for existing development allocations. Therefore, release of this part of the sub-parcel would constitute a limited weakening of the Green Belt. Loss of openness between Perton and Nurton/Old Perton would weaken distinction between the two, but would not increase overall harm.”



HARM RATING OVERVIEW OF LAND WITHIN SUB PARCEL |
NOT TO SCALE

3.27 Whilst the conclusions of the above assessment are noted, it remains that Green Belt Sub-Parcel ref: S54B extends significantly beyond Land off Wrottesley Park Road, Perton, which itself serves a reduced function against the five purposes of the Green Belt, as assessed below.

To Check the Unrestricted Sprawl of Large Built-Up Areas

3.28 Although the site relates well to the existing residential edge of Perton, development is currently contained to the east of Wrottesley Park Road, meaning development would extend further west than the current situation. The area to the west of the road however, is not absent of development, with a number of scattered farm dwellings situated to the north of the site and Perton Golf Course to the south.

3.29 The site is bounded to the north by woodland, containing the site both physically and visually within the wider landscape whilst providing a strong boundary to restrict future development. It is clear that the site has defensible boundaries on all sides and would form a natural extension to the existing urban area and as such, the site is not required to check the unrestricted sprawl of the existing built-up area.

3.30 Lastly, the provision of a country park to the western portion of the site would serve to restrict the sprawl of the built up urban area in the long-term.

3.31 It is therefore considered that the site makes a 'moderate' contribution to checking the unrestricted sprawl of large built-up areas, rather than the 'strong' contribution identified within the Green Belt Study.

To Prevent Neighbouring Towns from Merging into One Another

3.32 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 Perton and the nearest settlement of Pattingham to the west due to the distance of over 3km. As such, the development of the site would not result in the merging of neighbouring towns and would maintain the functions and separation of the Green Belt in this location. There are opportunities for the strengthening of the boundary at the interface with the wider landscape to the west which could provide increased physical and visual separation and a soft edge to development to further reinforce the edge.

3.33 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

3.34 Whilst the site contains some characteristics of open countryside, such as an absence of built development, it remains that the site has durable defensible boundaries that are afforded clear physical enclosure from the wider Green Belt. Furthermore, due to the existing uses that surround the site, its development would prevent further encroachment into the countryside. Whilst these boundary hedgerows are in place, they are degraded and gappy in places. 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 west.

3.35 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

- 3.36 Perton is not a historic town. The site is situated away from the Conservation Area and there are no views towards any heritage assets from within the site area. As such the removal of the site from the Green Belt would not affect the purpose of preserving the setting and special character of a historic town.
- 3.37 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

- 3.38 Whilst it is acknowledged that all Green Belt land make 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.
- 3.39 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

- 3.40 Overall, it is therefore considered that Land off Wrottesley Park Road, Perton, 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: S54B. This contribution is summarised in the table below:

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

GREEN BELT PURPOSES SUMMARY: LAND OFF WROTTESLEY PARK, ROAD, PERTON

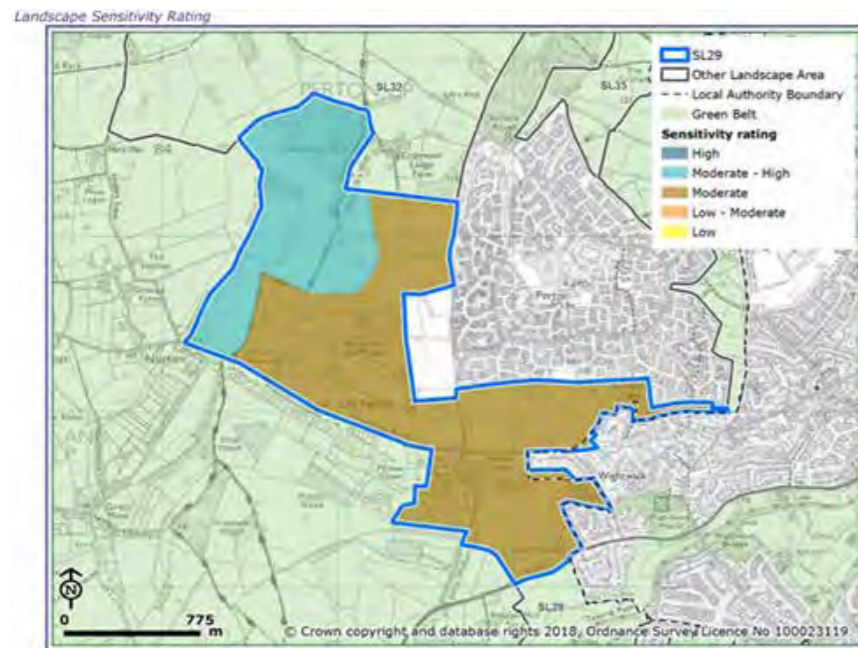
GREEN BELT HARM

- 3.41 As such, is contented that the Green Belt harm identified within the Study is also reduced, from 'high' to 'low-moderate'. It is the view of Richborough Estates that the site makes a moderate contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. The expansion of Perton into the site would result serve to facilitate the delivery of a new country park, which would result in a stronger Green Belt boundary than that formed by Wrottesley Park Road. Therefore, release of this site would constitute a limited weakening of the Green Belt.

LANDSCAPE AND VISUAL

LANDSCAPE CHARACTER

- 3.42 The characterisation process is a non-value judgement process; therefore, classifying landscapes into distinct areas does not suggest that one character area is more sensitive than another or valued by people more or less.
- 3.43 The landscape character appraisal process reviews the wider landscape character type at a national level, explores more detailed character features at a district/local level and analyses site-specific land use that informs local distinctiveness and sense of place. This promotion document considers the local, site-specific character features and context as identified through fieldwork. From this we can identify the relevant characteristics and important site features to retain.



LANDSCAPE SENSITIVITY RATING | NOT TO SCALE

- 3.44 South Staffordshire District Council has produced a Landscape Study (2019) which forms part of the Local Plan Review evidence base. The site falls with Landscape Parcel Reference: SL29 S1, which itself falls within the 'Settled Farmlands' Landscape Character Type. The landscape area is located west of Perton and Wightwick (Wolverhampton), and includes a narrow strip of land which separates the two settlements. The southern boundary is formed by the A454, the eastern boundary by the settlement edge, and the south western boundary by Pattingham Road. Nurton Brook forms the western boundary, and the northern boundary is formed by field boundaries. The area incorporates Perton Park Golf Course.
- 3.45 The Study concludes that the landscape is considered to have a moderate overall sensitivity to residential development. The narrow buffer of open agricultural land between the southern settlement edge of Perton and Wightwick has a particular sensitivity due to its role in preventing coalescence between the settlements.
- 3.46 It is considered that the development of the site for residential purposes represents an opportunity to strengthen existing field boundaries and provide a new country park, which would serve to define the western edge of Perton.

SITE-SPECIFIC CONTEXT

- 3.47 The site comprises 2 individual fields separated by mature hedgerow and tree planting.
- 3.48 The northern site boundary is defined by a PRoW which runs along an access drive to a number of farmsteads to the north. Beyond this a woodland block physically and visually contains the northern boundary.
- 3.49 The site's eastern boundary is defined by Wrottesley Park Road and associated residential dwellings which back onto the site. These provide an urban influence to the site which is surrounded by countryside to the west.
- 3.50 To the south west of the site lies Perton Golf Course, which confirms the area is not unspoilt landscape and contains urbanising features. To the south, further fields adjacent to Wrottesley Park Road provide a small gap between the existing residential dwellings and Perton Golf Course.
- 3.51 The hedgerow and field boundaries provide containment and structure to the fields and are also characteristic features within the surrounding local landscape. They should be retained where possible to strengthen the locally-contained nature of the site.



VIEWS

- **Viewpoint 1** shows the view from the PRow along the northern site boundary facing south. The lack of boundary vegetation along the southern side of the track allows for clear views across the site. In the distance, residential properties off Wrottesley Park Road are visible, showing that the frontage to the east will need to be considered to reflect the current built-edge.
- **Viewpoint 2** shows the view from the long distance route, Monarch's Way, which runs north to south in close proximity to the western site boundary. The rising topography almost entirely screens views towards the site to the east. Glimpses are possible of Perton Golf Course to the right, which is situated to the south west of the site and will allow for limited intervisibility through boundary vegetation.



- **Viewpoint 3** shows the view further along the track off Wrottesley Park Road as it approaches Monarch's Way. This view represents recreational users of the long distance footpath where users will be travelling at low speeds along pedestrian routes. Existing properties off Wrottesley Park Road are visible in the distance, identifying the site in the foreground. This highlights the requirement for enhancements to the existing western boundary vegetation to assist with filtering views from this route.

- **Viewpoint 4** shows the view facing west from the central gated access off Wrottesley Park Road. This view represents transient users of the road and local residents. The managed hedgerow allows for clear views across the site, with sparse tree planting filtering some views along the eastern boundary. Additional tree planting along the frontage will assist with providing a positive frontage along Wrottesley Park Road.



ECOLOGY

DESIGNATIONS

- 3.52 There are no statutory sites of nature conservation importance at an international (e.g. Special Areas of Conservation) or national (e.g. Sites of Special Scientific Interest) scale located within a 5km radius of the site.
- 3.53 There is one statutory nature conservation site within 5km designated at a local level, Smestow Valley Local Nature Reserve (LNR), a mosaic of woodland/scrub/grassland situated approximately 2.6km to the southeast of the site within the Wolverhampton City Council area.

HABITATS

- 3.54 The site consists predominantly of arable land with a network of hedgerows and occasional hedgerow and field boundary trees. There is a low overall diversity of habitats on the site and those that it does support are common and widespread within the local landscape. Therefore, it is considered that the ecological value of the site is limited.
- 3.55 Nonetheless, it has potential to support protected species including great crested newts and bats, and also species of conservation concern such farmlands birds.

PROTECTED SPECIES

- 3.56 The site offers potential for protected species, notably: bats, badger, breeding birds, wintering birds and reptiles. Dedicated surveys for these species will be undertaken to identify their presence and inform the scale of any required mitigation.
- 3.57 It is anticipated that the site provides significant scope to deliver any required mitigation in respect of protected species through the provision of the significant Green Infrastructure proposals within the site.

BIODIVERSITY PROTECTION & ENHANCEMENT

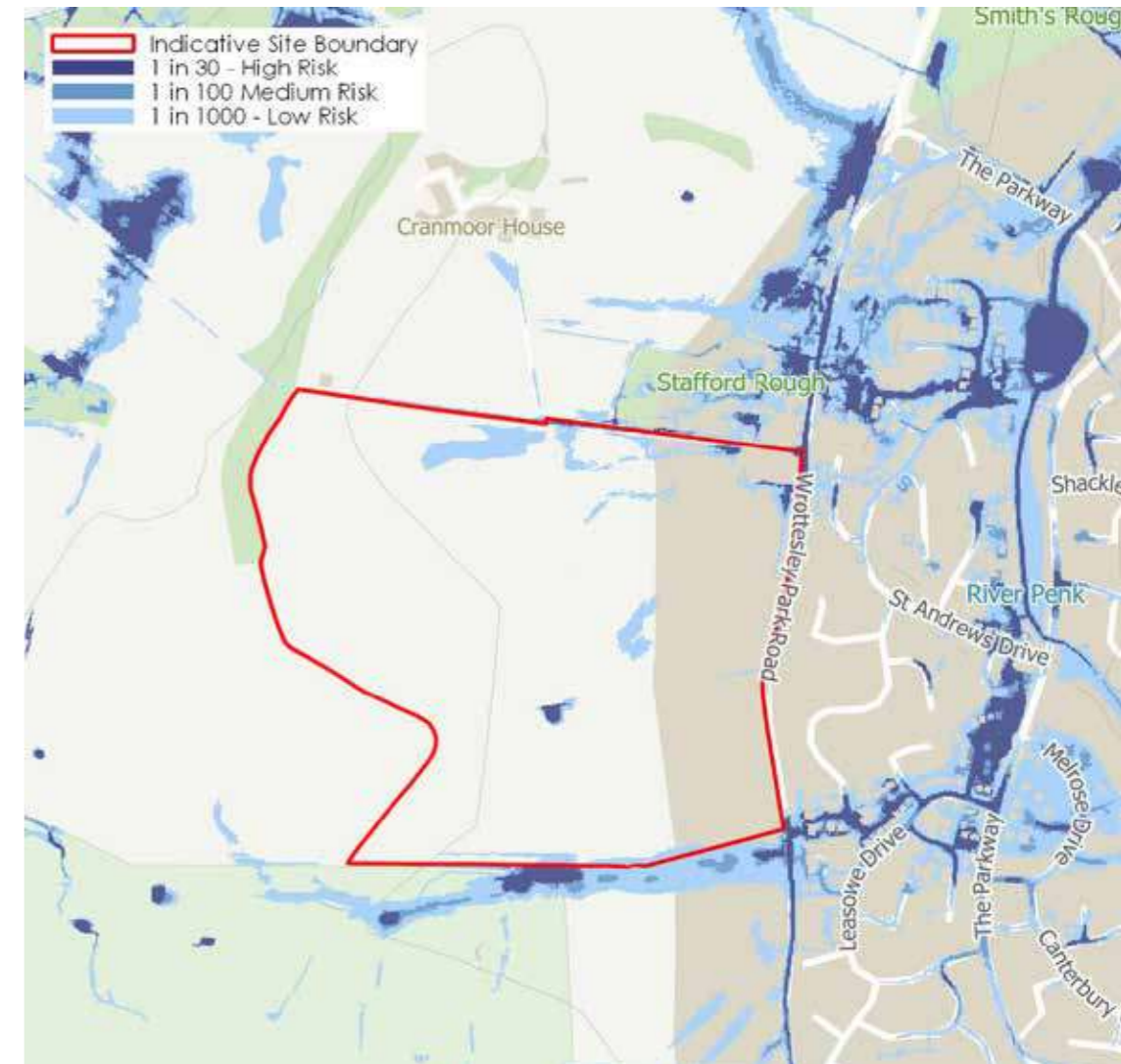
- 3.58 The site affords considerable opportunities for biodiversity enhancement through habitat creation through the provision of a significant area of open space both within the development area and through an opportunity to create a new Country Park. The creation of new habitats should be designed to contribute towards targets set within the UK and Staffordshire Biodiversity Action Plan.
- 3.59 The scheme has the opportunity to contribute to the targets for the following BAP habitats:
- Lowland Wood Pasture and Parkland – within a proposed Country Park and through retention and management of the existing mature trees and the planting of locally native broadleaf trees and shrubs. This would also contribute to the parkland landscape character of the Sandstone Estatelands;
 - Lowland acid grassland – the site is underlain by sandstone and the free-draining slope within the western section of the site represents a possible location for acid grassland creation. This is a rapidly declining habitat type of significant biodiversity importance and its potential on the site should be investigated by soil analysis to determine feasibility. If achievable, this is likely to require stripping of the O-horizon to remove the fertile topsoil rich in weedseeds to expose the underlying sandy substrate;

- Ponds and Lakes – Sustainable Drainage System (SuDS) features within the site could be designed to maximise biodiversity value. SuDS have the advantage of providing flood amelioration, visual amenity and biodiversity and therefore are a good example of multi-functional green infrastructure;
- Reedbeds – can be created around the margins of the ponds, lakes and swales by encouraging shallow areas of periodically inundated land. Reedbeds (and other tall emergent aquatic vegetation communities such as rushes and sedges) can be encouraged to establish through natural colonisation or preferably by introducing plants through coir mats and/or plug planting;
- Wildflower meadows – could be created within the areas of grassland and open space. In order to maximise their botanical value, a variety of seed mixtures and cutting regimes should be employed. Meadows could be combined with short mown amenity grass areas by creating informal paths and larger areas for recreation; and
- Biodiverse Architecture – consideration should be given to constructing the buildings to incorporate features on their exterior that can be used by roosting bats and nesting birds.

FLOOD RISK & DRAINAGE

- 3.60 According to the Environment Agency Flood Map for Planning, the application site is located entirely within Flood Zone 1 (Low Probability), which is land defined as having less than a 1 in 1000 annual probability of river or sea flooding. The watercourse is the River Penk (an ordinary watercourse), which is located approximately 275m east of the site.
- 3.61 The existing site is entirely greenfield in nature, with minor area of hardstanding to the north eastern corner. LiDAR data suggests that the site is peaked within the central region, which falls away to both the eastern and western boundaries. The overall lowest point of the site is located to the within the north eastern corner.
- 3.62 An appropriate Surface Water Management Strategy which complies with the latest local and national advice will be implemented on the site to attenuate the increase in surface water runoff caused by development. As a first option, infiltration should be considered for the disposal of surface water due to the expected favourable ground conditions of Sandstone bedrock geology with superficial deposits of sand and clay. It is therefore strongly recommended that infiltration testing is carried out at the earliest opportunity, to confirm if drainage via soakaway is achievable and ascertain a suitable rate of infiltration.
- 3.63 In the event that infiltration is not viable, alternative surface water outfall locations should be investigated. A network of drainage ditches appears to be present beyond the northern site boundary, to the north of the private access road. However, any connection would be subject to proving onward connectivity and existing condition, through survey works.
- 3.64 Furthermore, any connections would be reliant on agreements to connect through 3rd party land.
- 3.65 There are no public surface water or combined sewers located within the adjacent Wrottesley Park Road. Surface water sewers are present within the neighbouring residential development to the east, which discharge directly to the River Penk.

- 3.66 Any potential connections to this surface water network would require crossing 3rd party land, subject to the necessary agreements. A potential connection may be viable to the asset within Hoylake Road, through an undeveloped plot. However, this would remain subject to further investigation into the existing network invert levels, and confirmation of land ownership. Additionally, the network at this location is likely to be of small diameter and would be subject to capacity assessment by Severn Trent Water.
- 3.67 Owing to the constraints present to connect to surrounding drainage ditches, minor watercourses and public surface water sewers, drainage via infiltration remains the preferred method of surface water disposal.
- 3.68 The rate at which the runoff is discharged into either an existing drainage ditch network or existing sewer network would be restricted to the equivalent greenfield runoff rate, preventing an increase in flows leaving the site and thus ensuring that the development does not have a detrimental impact upon flood risk elsewhere.
- 3.69 Through the application of Sustainable Urban Drainage Systems (SuDS), the additional surface water will be stored within the site and subjected to multiple stages of treatment to guarantee that the water quality in the wider drainage network is protected. Wherever possible SuDS features will be above ground to enhance the aesthetic amenity of the development and provide valuable habitats for the local wildlife.
- 3.70 The attenuation provided will be appropriately sized to include an allowance for climate change. Example SuDS features that will be incorporated into the development wherever possible include attenuation basins, permeable paving and swales.
- 3.71 Principles within the previous concept plan iteration should be maintained, specifically the allocation of space for a 'blue corridor' which serves the proposed attenuation pond.



SURFACE WATER FLOODING | NOT TO SCALE



INDICATIVE SURFACE WATER DRAINAGE APPRAISAL | NOT TO SCALE





4

VISION



VISION

VISION

- To produce a living environment of the highest standard, with a clear and recognisable identity which reflects the local vernacular of Perton and contextual views;
- To provide a sustainable development comprising a range of houses, including family homes and smaller properties and significant new areas of publicly accessible open space, including a new Country Park to serve the village of Perton;
- To create a safe, attractive and secure neighbourhood, streets and places which promote social interaction which will afford access and movement priority to pedestrians and cyclists, including connectivity with the existing network of footpaths to local services and facilities;
- To provide a locally inspired and meaningful new green space network which enhances the character of the site and the natural and historic environment and creates a robust and enduring new Green Belt boundary; and
- To create a development that will enhance the attraction of Perton as a place to live and work, incorporating valued aspects of local character, heritage, landscape, visual amenity and biodiversity.







5

INDICATIVE MASTERPLAN & DESIGN PRINCIPLES

KEY ELEMENTS OF THE PROPOSAL

- Delivery of up to 300 dwellings to include market and affordable homes and a mix of property types aligned to local needs;
- Strong Green Belt boundary provided utilising existing trees and hedgerows;
- New residential links provided to wider residential areas and Perton Centre to maximise connectivity and encourage sustainable trips;
- Provision of a network of green links and corridors and provision of equipped play;
- Delivery of a new Country Park to serve Perton that connects into the Staffordshire Way;
- Retention of existing field pattern.
- Provision of a new visitor centre/café ancillary to the Country Park.
- Increased biodiversity and wildlife habitats, including incorporation of Sustainable Drainage Systems (SuDS).
- Creation of new, enduring Green Belt boundary and provide opportunity to provide recreational access, enhanced landscapes and increased biodiversity



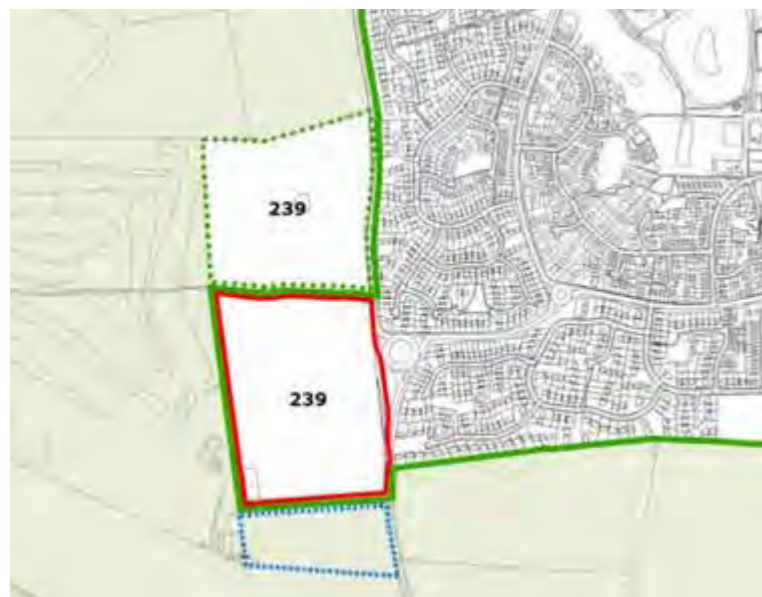
INDICATIVE MASTERPLAN | NOT TO SCALE



6

WEST PERTON

- 6.1 The adopted Local Plan for South Staffordshire District comprises the Core Strategy (2012) and the Site Allocations Document (2018). The Site Allocations Document removed 16.6 hectares of land from the Green Belt adjacent to Perton (site ref: 239), with 9.1 hectares allocated for residential development (minimum of 163 dwellings), with an additional 7.5 hectares safeguarded for future development needs (an additional minimum of 112 dwellings). An extract of the adopted Site Allocations Document proposals Map Inset for Perton is included below.
- 6.2 The land under the control of Richborough Estates is located immediately to the north of the safeguarded land west of Wrottesley Park Road. The release of this land from the Green Belt and its allocation for residential development represents an opportunity to deliver a comprehensive and connected new community west of Perton. Discussions are ongoing between Richborough Estates and neighbouring sites to deliver this vision.
- 6.3 The allocation of the land for residential development offers the opportunity for the delivery of a country park (see Chapter 8 of this document) as well as improving and enhancing pedestrian, cycle and green space connectivity within the wider area.



WIDER AREA MASTERPLAN | NOT TO SCALE







DELIVERABILITY & KEY BENEFITS

DELIVERABILITY

- The site is a suitable area for housing as there are no physical, technical or environmental constraints preventing its development.
- The Framework requires Local Planning Authorities to maintain delivery of housing land to meet their housing targets. To be considered deliverable, a site should be:
- **Available.** A site is considered available when there is confidence that there are no legal or ownership problems.
- **Suitable.** A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities; and
- **Achievable.** A site is considered achievable for development where there is a reasonable prospect that housing will be delivered on the site within five years, and in particular, development of the site is viable.

AVAILABLE

- 7.1 Richborough Estates has a legal agreement in place with the landowners and are in a position to progress with the promotion of the site for residential led development.
- 7.2 If the site is to be successfully allocated for development and removed from the Green Belt, Richborough Estates would seek to develop the site immediately, which would contribute considerably to the District's housing supply.

SUITABLE

- 7.3 The site is suitable for residential development for the following reasons:
 - It offers a suitable location for development and can be brought forward immediately following an allocation;
 - It would form a natural extension to the established area of Perton;

ACHIEVABLE

- 7.4 The site has been fully assessed in terms of its environmental considerations and it has been demonstrated that the delivery of the site is achievable and deliverable, and a team of technical consultants has been appointed to support the delivery of this site moving forward. Where technical constraints are identified, Richborough Estates will provide appropriate mitigation and invest in the site to ensure delivery.
- 7.5 Richborough Estates has reviewed the economic viability of the proposals in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Perton. These considerations have been analysed alongside cost factors associated with the site, including site preparation costs and site constraints. Richborough Estates can therefore confirm that the site is economically viable and therefore achievable.

KEY BENEFITS

- 7.6 Development of the site will contribute to building a strong, responsive and competitive economy. In particular, the delivery of new homes at the site will bring economic benefits during the construction, operational and commercial stages.
- 7.7 The proposal would assist in the delivery of supporting infrastructure, including a new Country Park to serve new and existing residents of Perton.
- 7.8 Overall, the provision of much needed additional open market and affordable homes in the District will contribute to building a strong, responsive and competitive economy in line with the objectives of the NPPF.





8

COUNTRY PARK



- Key**
-  Application site boundary
 -  Open space
 -  Indicative surface water attenuation basin
 -  Existing (retained) trees & hedgerow
 -  Indicative proposed planting
 -  Potential for equipped play/LEAP
 -  Natural play "station"
 -  Existing Public Right of Way
 -  Proposed footpath connection improvements to Parkway Roundabout
 -  Proposed hard surfaced pedestrian/cycle link
 -  Proposed mown path
 -  Indicative development cell

INDICATIVE MASTERPLAN | NOT TO SCALE



COUNTRY PARK

- 8.1 As identified previously within this Vision Document, the release of Land off Wrottesley Park Road for residential development provides the opportunity to facilitate the delivery of a new country park to the western edge of the site, to serve both existing and future residents of Perton and the surrounding area.
- 8.2 The delivery of Perton Country Park has previously been identified as an emerging infrastructure opportunity within the Council's Infrastructure Delivery Plan (2019 version). This opportunity is reflective of Perton's status as a sustainable Tier 2 settlement, as well as site-specific green infrastructure characteristics which lend the site to the delivery of a park.
- 8.3 A country park delivered at Land off Wrottesley Park Road would remain in the Green Belt and would serve as an enduring defensible boundary in the long-term, beyond the plan period. In particular, the country park would provide an opportunity to give residents access to the wider Green Belt and a significant area of green infrastructure with potential to link to the wider public Right of Way network beyond.
- 8.4 A country park would be capable of delivering the following facilities and benefits, as shown on the Illustrative Layout shown adjacent.
- Café/visitor centre
 - Community orchard
 - Informal sports area
 - Equipped play area
 - Natural play areas
 - Picnic area
 - Wildflower meadows
 - Heathland areas
 - Formal and informal walking routes
 - Connectivity to wider public right of way network
- 8.5 The design of the country park will continue to evolve through discussions with South Staffordshire District Council and other relevant parties as the site continues to be promoted through the process of the Local Plan Review.







SUMMARY AND CONCLUSIONS

9.1 This Promotional Document demonstrates that there is a need to accommodate an increased level of housing within the District to meet future housing needs and there are exceptional circumstances to justify the need for Green Belt release to accommodate this as part of the Local Plan review.

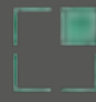
9.2 This site represents a well located and exceptionally sustainable site, which would deliver approximately 315 new market and affordable dwellings to assist in meeting the future housing requirement of South Staffordshire District without undermining the purposes of the Green Belt or adversely impacting upon the environment.

9.3 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;
- Deliver a new Country Park which would offer significant biodiversity benefits and provide recreational access to the countryside;
- Provide the potential to deliver new community facilities, including a visitor centre and café linked to the Country Park;
- Be sustainably located on the edge of Perton and within proximity of a wide range of services and facilities, with new pedestrian/cycle links created to the wider residential area and Perton Centre;
- Accommodate a high-quality residential development with safe, attractive and secure neighbourhood, streets and places which promote social interaction which will afford access and movement priority to pedestrians and cyclists, including connectivity with the existing network of footpaths to local services and facilities;
- Provide a locally inspired and meaningful new green space network which enhances the character of the site and the natural and historic environment and creates a robust and enduring new Green Belt boundary; and
- Create a development that will enhance the attraction of Perton as a place to live and work, incorporating valued aspects of local character, heritage, landscape, visual amenity and biodiversity.



DESIGN



ENVIRONMENT



PLANNING



ECONOMICS



HERITAGE

pegasusgroup.co.uk



Pegasus Group

5 The Priory,
Old London Road,
Canwell,
Sutton Coldfield,
B75 5SH

Telephone: 0121 308 9570

COPYRIGHT The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group.

Crown copyright. All rights reserved, Licence number 100042093.