

# Regulation 19 Dudley Local Plan

**Land at Ham Lane/Oak Lane, Kingswinford.**

**On behalf of Clowes Developments Limited.**

Date: November 2024 | Pegasus Ref: P24-1247

Author: SB

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## Document Management.

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# 1. Introduction

- 1.1. This representation responds to the Dudley Local Plan ('DLP') consultation on the Publication Version of the Plan, being held under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2. Representations are made with regard to the Plan itself and to the accompanying published evidence, having regard to the National Planning Policy Framework ('NPPF') of December 2023.
- 1.3. This representation is made by Pegasus Group on behalf of Clowes Development ('Clowes') who have land interests at Ham Lane/Oak Lane in Kingswinford within Dudley Borough and also land interests off the B4176 and A449, Wall Heath within the South Staffordshire District.
- 1.4. Clowes has previously submitted details of their land interests in South Staffordshire through the Regulation 18 Preferred Options Plan, where Harris Lamb made representations on behalf of Clowes.
- 1.5. The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound.
- 1.6. The tests of soundness are set out in the NPPF (December 2023), paragraph 35. For a Plan to be sound, it must be:
  - **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;
  - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - **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
  - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.7. These tests of soundness, along with other legal and procedural requirements associated with the Plan-making process provide a contextual framework for these representations.

## Clowes Land Interests

### Ham Lane/Oak Lane, Kingswinford

- 1.8. Clowes' land interests here fall within the DMBC administrative area. The Site extends to 7.42ha and comprises agricultural land that is used for crop growing. The site is immediately adjacent to the built-up urban area with residential development to the south, and existing industrial land (employment) to the east. A Site Location Plan is at Appendix 1.



- 1.9. The Site is in the Green Belt but it sits immediately adjacent to the identified Pensnett-Kingswinford corridor identified in the draft Local Plan.
  - 1.10. The Site falls predominantly within Flood Zone 1, has access off Ham Lane/Oak Lane and is well defined by existing site boundaries in the form of mature vegetation with the railway line (now the Old Railway walk) to the north. To the south and east is the existing urban area and to the west is also existing residential accommodation.
  - 1.11. The site is well defined by existing, physical boundaries meaning that, in Green Belt terms, its release from the Green Belt can be done so with identifiable boundaries containing the site. The site is also very well defined by its existing boundaries. A former railway line, now well wooded, provides an identifiable landscape feature and can be used to help contain the developed area.
  - 1.12. Clowes consider this Site would provide an ideal location to assist with meeting the needs of Dudley in assisting in the delivery of employment development within the plan period and provide modern new employment facilities that will complement the existing facilities such as at Ham Lane/Oak Lane (Dudley), in a location that is considered a priority area for growth in the Council's spatial strategy, adjacent to a regeneration corridor.
  - 1.13. Clowes would welcome the opportunity to work with the Council to assist in delivering much needed jobs for local people as well as potential improvements to the road network in the immediate area.
- Land off A491/Wolverhampton Road, Wall Heath
- 1.14. Clowes' land interests here are within the South Staffordshire Council administrative area, although immediately adjacent to Dudley.
  - 1.15. The land extends to 71.2 hectares and the indicative masterplan at Appendix 2 demonstrates how a range of, B2 and B8 could be delivered on the site with a combined floor area of 84,844 square metres.
  - 1.16. The Site is deliverable, on a principal commuting route on the edge of a conurbation and it could help deliver improvements to the A449/B4176 road junction. It has the potential to deliver a meaningful contribution to new employment provision within South Staffordshire and assist in contributing to the unmet employment needs of neighbouring authorities, including Dudley.
  - 1.17. The site is located on the boundary of South Staffordshire District With Dudley Metropolitan Borough Council (MBC). Land to the south of the site is within Dudley MBC's area. The Site abuts the northern edge of the settlement of Wall Heath (Dudley MBC) with the southern edge of the village of Himley (SSDC) to the north. The site is very well related to the Black Country and is capable of being served by public transport, a point accepted by the Council.
  - 1.18. The site is well defined by existing, physical boundaries meaning that, in Green Belt terms, its release from the Green Belt can be done so with identifiable boundaries containing the site. The site is also very well defined by its existing boundaries. A former railway line, now well wooded, provides an identifiable landscape feature and has been used to help contain the developed area which is shown on the Masterplan at Appendix 2, the settlement of Wall

Heath to the south provides a physical southern boundary and the A449 trunk road provides an eastern boundary.

- 1.19. Some minor work will be needed to the wooded area along the former railway line to accommodate access, this would have limited impact and would be fully mitigated with replacement planting. Indeed, as is shown on the illustrative Masterplan ample land is retained for biodiversity net gain purposes and, overall there will be an increase in tree planting across the site and is a key pedestrian link and there are no significant constraints to the delivery of the land.
- 1.20. Clowes consider this Site would provide an ideal location to assist with meeting the needs of Dudley in assisting in the delivery of employment development within the plan period and provide modern new employment facilities that will complement the existing facilities such as at Ham Lane/Oak Lane (Dudley) and Heathmill Road Trading Estate (Wombourne). Both facilities are a) dated in terms of accommodation and b) fully occupied.
- 1.21. Clowes would welcome the opportunity to work with the Council to assist in delivering much needed jobs for local people as well as potential improvements to the road network in the immediate area.
- 1.22. For context, Clowes land interests within South Staffordshire and Dudley administrative areas, which are referred to in these representations, are identified on the Context Plan below.



Context Plan, Clowes Land Interests

## 2. Planning Policy Context

- 2.1. Clowes supports Dudley Metropolitan Borough Council's ('DMBC') review of the adopted Development Plan, particularly given the adopted Black Country Core Strategy was adopted in February 2011 and the Borough Development Strategy was adopted in 2017. This provides the opportunity for the Council to comprehensively review the Vision, Strategic Objectives, development requirements, spatial development strategy, and policies shaping detailed development proposals.
- 2.2. **National Requirements for Plan-Making**
- 2.3. The existing Core Strategy for South Staffordshire was adopted in 2012, and as such a holistic review of the Plan is overdue. A Local Plan review is also committed to within the Site Allocations Document 2018. This Local Plan Review will therefore ensure that an up-to-date Local Plan for South Staffordshire will be in place to support growth and meet future development needs across the Plan period.
- 2.4. The Regulation 19 Publication Version of the DLP follows previous consultations on the Local Plan review. This included in Autumn 2023 consultation on the Draft Plan.
- 2.5. NPPF para 24 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 Dudley, strategic matters include housing, employment, infrastructure, and the Green Belt.
- 2.6. Clowes supports DMBC's proactive approach in continuing with a review of the Local Plan, to ensure that an up-to-date policy framework exists within the District to guide growth to 2041 and to ensure that development is genuinely plan-led but would like to make some representations on the soundness of some parts of the Plan.
- 2.7. It should also be noted at this point, that the Labour Government undertook consultation on proposed changes to the NPPF in July-September 2024. The changes proposed are referred to within these representations where relevant and appropriate and in addressing the Housing, Communities and Local Government Committee on 20<sup>th</sup> November, Matthew Pennycook indicated that the amended NPPF would be published before the end of 2024.

### **3. Dudley to 2041: Spatial Vision, Objectives and Priorities**

- 3.1. The Dudley Local Plan is seeking to set out strategic policies and proposals for growth and development and should therefore cover a minimum period of 15 years from adoption, as set out at NPPF paragraph 22.
- 3.2. The Council's July 2023 Local Development Scheme envisages adoption of the Dudley Local Plan by Spring 2026. This is dependent on the timescales for Examination in Public of the Local Plan.
- 3.3. Whilst adoption in Spring 2026 may just provide a 15 year Plan period, to allow for seemingly inevitable delays the Council should consider extending the Plan period, to avoid having to add extra years and thus additional land for development. Extending the Plan now would ensure it is consistent with national policy on the minimum time period which Plans should cover.
- 3.4. There are no in principle objections to the Vision and Objectives of the Plan, but some observations are made.
- 3.5. Vision Point 4 seeks to deliver sustainable urban growth to meet the needs of communities and businesses and it is supported by Strategic Priority 4 regarding the fostering of economic growth and development. Strategic Priority 4 seeks to deliver conditions to support growth, including 'ensuring a supply of employment land to contribute towards meeting the Borough's strategic needs.
- 3.6. To deliver the Vision and Objectives, the Plan must plan to meet both its economic and housing needs in full and this should be set out clearly in the Vision. For reasons set out in later sections of this representation the Plan is not currently identifying sufficient land to meet its economic needs. The Plan will therefore be unsound as it cannot be positively prepared if it doesn't meet its own needs.

## 4. Policy DLP1: Development Strategy

- 4.1. Policy DLP1 sets out the council's commitment to delivery of housing and employment growth across the Plan period to 2041, including the delivery of 'at least' 22.6ha of employment land and 10,470 new homes.
- 4.2. Part 3 of the policy goes on to state that the full housing and employment needs of the Borough will be met through other identified sites, and reliance on neighbouring authorities with a functional link with Dudley via the Duty to Co-Operate.
- 4.3. Table 5.1 goes on to identify how housing and employment land will be delivered. The following comments are made in this representation in respect of each type of development.

### Housing

- 4.4. The Council are planning for 10,470 net new homes across the Plan period 2024 – 2041 (616/annum). The need for housing (as identified in the Council's Housing and Delivery Position Statement (October 2024) is 11,169 dwellings and Table 5.12 of the Plan identifies that 699 dwellings are to be exported through the Duty to Co-Operate to other authority areas.
- 4.5. Table 8.1 of the Plan then goes on to identify that the Council can identify 10,470 new homes when considering their housing land supply.
- 4.6. Paragraph 11 of the NPPF requires that strategic policies in plans should "promote a sustainable pattern of development that seeks to: meet the development needs of their area...Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas." Paragraph 60 sets out the Government's objective of "*significantly boosting*" the supply of homes and paragraph 61 provides additional guidance identifying that strategic policies should be informed by the minimum local housing need, using the outcome of the standard method as a starting point for establishing a housing requirement for the area.
- 4.7. The Council are, however, not planning so 'significantly boost' their supply of housing by only planning to meet the minimum requirements. There is also no identified buffer included, so that there would still be delivery of housing to meet target should a site fail to deliver.
- 4.8. Indeed, the housing target set out in the Plan and chosen spatial growth option 3 (meeting all need through urban uplift in regeneration corridors) refers only to meeting the Borough's needs. None of the Options for delivery of housing referred to increased or higher growth numbers and therefore all reasonable alternatives have not been assessed in the Sustainability Appraisal (September 2024).
- 4.9. It is therefore considered that the Plan should include for a 5% or 10% uplift on housing figures, which will allow the Council to plan for delivery of growth in accordance with the spatial strategy, in sustainable locations and have a buffer should any sites not deliver as expected or become stalled for any reason. In turn, that buffer will ensure the Council can identify supply to meet their requirement to demonstrate a 5-year supply of land for housing and be less vulnerable to speculative applications under the presumption in favour

of sustainable development, particularly where such speculative development could conflict with the preferred spatial strategy for growth. This would be a justified and effective approach.

- 4.10. Further, in August 2024, the Labour Government consulted on proposed changes to the NPPF which included for an amended standard methodology to identifying housing requirements. A spreadsheet was published with the revised targets for each authority under the amended standard method. For DMBC the revised standard method will increase from 657 dwellings per annum to 1,594 dwellings per annum. The revised NPPF is expected to be formally published in December 2024.
- 4.11. In accordance with the proposed transition arrangements for Plan-making in the amended NPPF, if the Council have not submitted the Plan for Examination in Public within one month of the publication of the NPPF they will need to revisit the Plan and its proposed targets and growth as the difference in annual housing requirements from the current to new standard methodology will exceed 200 dwellings.
- 4.12. On that basis, it appears prudent to revisit the identification of land for housing growth and seek to identify additional land for housing. As drafted, it appears that the Plan may not be sound as it is unlikely to be consistent with national policy and the revised standard method and therefore cannot be seen to have been positively prepared.
- 4.13. There is no clear approach to how the Council's unmet need will be met in neighbouring authorities, and with other neighbouring authorities declaring unmet need that they are looking to Dudley to assist with, the Council appear to not be addressing their unmet need through the Duty to Co-Operate and indeed are not fulfilling the Duty to Co-Operate duty.

### **Employment**

- 4.14. The Black Country Economic Development Needs Assessment 2023 update identified that there will be a shortage of employment land supply across the Black Country during the period 2020-2041 of 15.63ha (gap between estimated demand and supply), of which 73ha will be in Dudley.
- 4.15. The draft Local Plan policy DLP18 states that the Council will seek to deliver at least 72ha of employment land between 2020 – 2041 but as set out in Policy DLP1, 50ha of that will be exported to other authorities through the Duty to Co-Operate, with 22.1ha delivered within the Borough.
- 4.16. Text accompanying the policy notes the strong economic and functional ties with South Staffs (refers specifically to the M54 corridor in particular). It is also noted at para 9.23 of the draft Plan that work is 'ongoing' under the Duty to Co-Operate to address where that unmet need can be delivered.
- 4.17. Similarly, the employment target set out in the Plan and chosen spatial growth option 2 (meeting all need in the urban areas and via DtC contributions). But neither option considered an increased or higher amount of employment land and therefore all reasonable alternatives have not been assessed in the Sustainability Appraisal (September 2024).
- 4.18. Additional comments are made on this matter in our representations to Policy DLP18 within this representation, but it is not considered that the Duty to Co-Operate has established 50ha of land which can be delivered elsewhere to meet Dudley's needs. If this is the case,



then the Plan is unsound as it will not meet the area's needs and is therefore not positively prepared.

- 4.19. With reference to both housing and employment land, it is not considered that all reasonable alternatives have been assessed for meeting Dudley's growth needs, and the Council have not met their Duty to Co-Operate requirement, or clearly identified where unmet needs are going to be delivered in neighbouring authorities.

## 5. Policy DLP2 –Regeneration Corridors

- 5.1. Clowes land interests at Ham Lane/Oak Lane sit right on the edge of Regeneration Corridor 1 as identified in the draft DLP – Kingswinford to Pensnett. These Regeneration Corridors are considered part of the Growth Network for the Plan, and are to be the ‘primary focus’ for *“new development, regeneration and infrastructure investment to support the delivery of significant growth and promote wider benefits to communities”*
- 5.2. As drafted the Regeneration Corridor 1 will not deliver its overall purpose. Table 5.1 identifies that the Corridor is only proposed to deliver 585 dwellings between 2024–2041 and only 3.08ha of land for employment uses. If Regeneration Corridors are to be a focus for growth as set out in draft Policy DLP1 then they should be accommodating as much growth as possible and all options, including Green Belt release, should be considered.
- 5.3. There is land available near the Regeneration Corridors, such as Clowes’ land interests at Ham Lane/Oak Lane that could deliver development to meet Dudley’s identified needs in a suitable and sustainable location.
- 5.4. This could mean reviewing Green Belt boundaries, which it is appropriate to do through a Local Plan review, where exceptional circumstances are identified that identify the need for boundaries to be reviewed (NPPF, para 145). It is also noted that the draft NPPF that went out to consultation in July 2024 seeks to amend that requirement and if published as proposed, there will be an expectation that local planning authorities should review Green Belt boundaries for the purposes of plan-making, altering them in exceptional circumstances, which include where an authority cannot meet its identified need for housing, commercial or other development.
- 5.5. The Site was considered in the Green Belt Assessment within a Wider parcel of land (Parcel B45) where the overall parcel was considered to contribute to the purposes of including land within the Green Belt as follows:
- Strong contribution to checking the unrestricted sprawl of urban areas
  - Strong contribution to safeguarding the countryside from encroachment
  - Weak/no contribution to preventing the merging of towns
  - Weak/no contribution to preserving the setting and special character of historic towns
- 5.6. The site itself was not assessed in terms of its contribution to the Green Belt, but it is considered that its contribution to Green Belt is more limited than other areas within the same parcel may be.
- 5.7. Release of the Site would retain a strong boundary to open countryside beyond and safeguard the countryside from encroachment as the site is bound to the north largely by an old railway line that is now part of a green infrastructure corridor. In turn, the Site’s location, bound to the east and south by existing development, the old railway line to the north and existing buildings at Holbeache House to the west is well contained and would not result in further expansion of the urban area north or west.



- 5.8. The Plan is currently unsound as it is not justified, it has not considered all reasonable alternatives or land available to meet its own needs, in locations that would support its proposed Development Strategy.

## 6. Policy DLP18: Economic Growth and Job Creation

- 6.1. The draft Policy confirms that the Employment land target for the period 2020–2041 is 72ha. Of that, the Council are planning for delivery of 21ha within the Borough, and for delivery of 50ha of employment land through the Duty to Co-Operate process and in areas which have strong existing or potential functional economic relationships with Dudley.
- 6.2. Of the 21ha of land within Dudley, 11ha of it is proposed to be delivered through existing allocations. The soundness of those allocations is questioned, particularly as some date back to 2011 and the Black Country Plan. If existing allocations have not come forward in the current Plan period, it is considered they are likely to be subject to constraints that will prevent their development. They must therefore be carefully scrutinised at examination if they are to be found sound.
- 6.3. Of the 50ha to be delivered in cross-boundary locations, paras 9.25–9.26 of the Plan identify that 14ha of that land can be delivered in South Staffordshire to meet Dudley's needs and notes *"it can be considered as a commitment towards contributing to Dudley's employment land supply."*
- 6.4. The Council's Duty to Co-Operate (DtC) Statement identifies that (whilst related to the then Black Country Plan), Shropshire were planning on delivering 30ha of employment land to meet the Black Country needs, but it is noted at para 4.4 that the apportionment of such delivery for Dudley's needs will now need to be clarified.
- 6.5. 14ha of land within South Staffordshire also appears to have been identified to deliver part of Dudley's unmet need as set out in the Plan, but this is not mentioned in the Duty to Co-Operate paper specifically, rather the only reference is to a Statement of Common Ground (SoCG) with South Staffordshire, which has not yet been published. Furthermore, that land is related to the West Midlands Strategic Rail Freight Interchange and it is a specific type of employment land, for logistics/distribution and that does not address the broad range of required employment land.
- 6.6. Similarly, the DtC notes that discussions with neighbouring authorities (which are seemingly still being undertaken jointly across the Black Country Authorities have identified land to meet the employment needs shortfall. But the location of that land is not set out and no agreed DtC or SoCG is apparent on this point.
- 6.7. Figure 9.2 of the draft DLP identifies that South Staffordshire is an area of strong economic transaction with Dudley (and the Black Country) in terms of Functional Economic Market Areas. It therefore seems sensible that South Staffordshire could deliver employment land to meet Dudley's requirements. But such land must be identified in South Staffordshire's Plan, which itself is at an advanced stage and the Council should be seeking amendments to the South Staffordshire Plan to clearly identify land to meet Dudley's unmet need in order to be able to effectively demonstrate that the DtC has been addressed.
- 6.8. Notwithstanding, such allocations should take place as close as possible to the Black Country boundary in order to help support the expansion of existing businesses in that area and land off A491/Wolverhampton Road Wall Heath, whilst in South Staffordshire, is well placed to fulfil the needs of local businesses for future floorspace. As the Masterplan at

Appendix 2 demonstrates, a very attractive scheme can be produced with a range of units set in an attractive landscape led setting, providing significant opportunities for biodiversity net gain and ensuring that local residential amenity is protected. A Vision Document is also attached to these representations at Appendix 3.

- 6.9. A failure to allocate such land will mean that the economic objectives of the Framework, particularly those set out at paragraphs 8a and 85 will not be met and there will then be consequences for the social aspects of the Framework with a lack of employment opportunities for the local population.
- 6.10. It is considered that the Council have not maximised opportunities to identify additional land to deliver employment sites/growth. There is land available near the Regeneration Corridors, such as Clowes' land interests at Ham Lane/Oak Lane that could deliver development to meet Dudley's identified needs in a suitable and sustainable location.
- 6.11. This could mean reviewing Green Belt boundaries, which it is appropriate to do through a Local Plan review, where exceptional circumstances are identified that identify the need for boundaries to be reviewed (NPPF, para 145). It is also noted that the draft NPPF that went out to consultation in July 2024 seeks to amend that requirement and if published as proposed, there will be an expectation that local planning authorities should review Green Belt boundaries for the purposes of plan-making, altering them in exceptional circumstances, which include where an authority cannot meet its identified need for housing, commercial or other development.
- 6.12. The Site was considered in the Green Belt Assessment within a Wider parcel of land (Parcel B45) where the overall parcel was considered to contribute to the purposes of including land within the Green Belt as follows:
- Strong contribution to checking the unrestricted sprawl of urban areas
  - Strong contribution to safeguarding the countryside from encroachment
  - Weak/no contribution to preventing the merging of towns
  - Weak/no contribution to preserving the setting and special character of historic towns
- 6.13. The site itself was not assessed in terms of its contribution to the Green Belt, but it is considered that its contribution to Green Belt is more limited than other areas within the same parcel may be.
- 6.14. Release of the Site would retain a strong boundary to open countryside beyond and safeguard the countryside from encroachment as the site is bound to the north largely by an old railway line that is now part of a green infrastructure corridor. In turn, the Site's location, bound to the east and south by existing development, the old railway line to the north and existing buildings at Holbeache House to the west is well contained and would not result in further expansion of the urban area north or west.
- 6.15. The Plan is currently unsound as it is not justified, it has not considered all reasonable alternatives or land available to meet its own needs, in locations that would support its proposed Development Strategy. It has also not demonstrated that it has worked fully with neighbouring authorities through the Duty to Co-Operate, to identify land that could deliver



employment land in locations such as South Staffordshire where there is a strong functional economic market and where land is available that could deliver development to meet Dudley's unmet need.

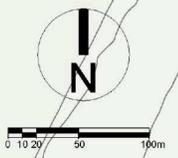


## Appendix 1 – Ham Lane/Oak Lane, Site Location Plan





## **Appendix 2 – Land off A449/Wolverhampton Road, Indicative Masterplan**



**bhb**  
architects

3533 - Wall Heath, Staffordshire  
Drawing SK04  
Indicative Site Plan  
Scale 1:2500 @ A1  
13 / 12 / 2022



## **Appendix 3 – Land off A449/Wolverhampton Road, Vision Document**

VISION DOCUMENT

# LAND AT WALL HEATH

DECEMBER 2019





This Vision Document has been prepared on behalf of CWC Group by Harris Lamb Property Consultancy.

It has been informed by work undertaken by the wider consultant team which includes:

- > **HARRIS LAMB**  
Planning
- > **BHB ARCHITECTS**  
Masterplanning
- > **BWB CONSULTING LIMITED**  
Flood Risk, Drainage and Highways
- > **HARRIS LAMB**  
Environmental / Ecology
- > **TYLER GRANGE**  
Landscape and Visual

The Vision Document and Masterplan contained within it is an evolving document and is subject to change as further information and supporting evidence is produced and/or comes to light. The current proposals are a first draft intended to stimulate discussion and will, therefore, evolve over time and should be read and considered in this context.

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# PREFACE

This Vision Document has prepared on behalf of CWC Group to support the promotion of land at Wall Heath as a strategic employment site, which could deliver in the region of 84,844 m<sup>2</sup> of employment floorspace and new areas of open space and enhanced pedestrian and cycling routes to the benefit of the wider community.

The site is located within the administrative area of South Staffordshire District Council albeit that it is located immediately adjacent to the built-up edge of Dudley Metropolitan Borough Council, which forms part of the four Black Country councils (Dudley, Wolverhampton, Sandwell and Walsall).

This Vision Document is intended to assist the Council with its consideration of the land at Wall Heath and its suitability for removal from the Green Belt and allocation as a strategic employment site. To inform the Vision Document, an initial high-level assessment of baseline conditions at the site has been undertaken, which has identified any known constraints, but also highlighted opportunities for its future development. It confirms there are no technical or environmental constraints that would prevent the delivery of the site and that the development of the site could contribute to meeting the future employment land requirements of both South Staffordshire and the Black Country over the Plan Period.

A draft concept masterplan is included in the Vision Document, which sets out a number of principles to help guide the future development of the site to create a sustainable, high quality new employment development at Wall Heath.

## SECTION 1 THE VISION

### OUR VISION FOR THE LAND AT WALL HEATH

- › To create a high-quality strategic employment site.
- › Deliver in the region of approximately 84,844 m2 of employment floorspace.
- › To provide an appropriate mix of B1, B2 and B8 employment uses.
- › Create a sustainable and attractive environment where people would like to work.
- › Create new accessible and usable public open space to the north which would act as a strategic gap between the site and the village of Himley.
- › Implement a sustainable movement strategy where walking and cycling opportunities are integrated into the heart of the development.
- › To provide a substantial green buffer around the site which would protect the amenity of local residents in addition to wildlife habitats.
- › Protecting and enhancing existing wildlife habitats on site and providing a net gain in biodiversity.
- › Utilising Sustainable Urban Drainage Systems to manage flood risk and surface run-off.
- › To provide enhanced pedestrian and cycling links between the urban area of Wall Heath to the South to Himley to the north via the existing Himley 6 bridleway.
- › To provide a suitable access solution linking the site to the wider highway network.
- › To link the site to potential future residential development opportunities to the north of the site in the village of Himley.

The accompanying masterplan identifies how these principal matters can be incorporated in the development; it is intended to inform future discussions and studies regarding the potential of the site.

## SECTION 2 INTRODUCTION

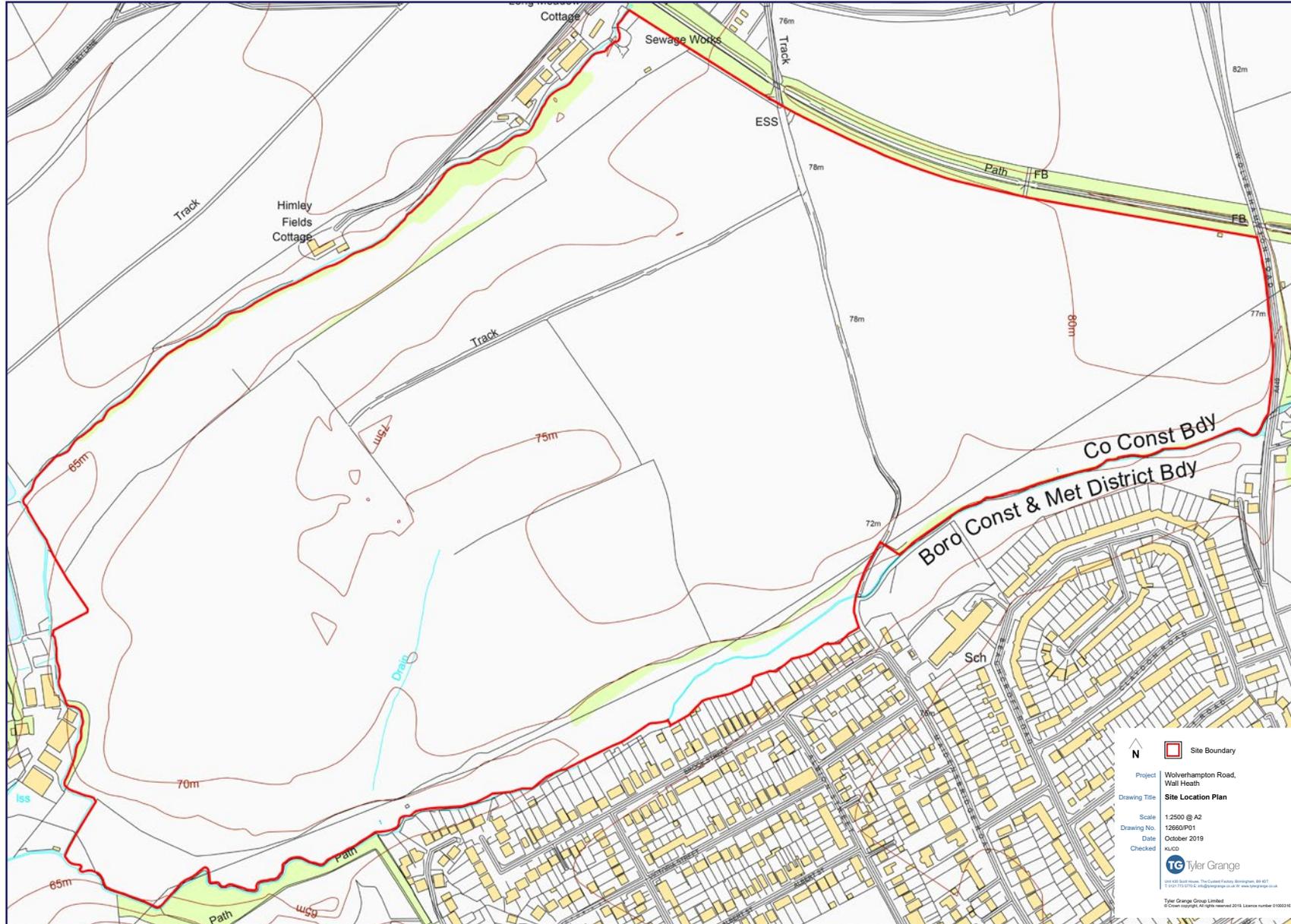
This Vision Document has been prepared by CWC Group to support the promotion of land at Wall Heath as a strategic employment site. The area of land being promoted extends to 71.2 hectares and is located within South Staffordshire albeit that it is located immediately adjacent to the built-up edge of Dudley Metropolitan Borough, which is within the Black Country. It is anticipated that the site will deliver in the region of 84,844 m<sup>2</sup> of employment floorspace and new areas of open space and enhanced pedestrian routes to the benefit of the wider community.

The site is being promoted for development within South Staffordshire's administrative area, who are currently reviewing their Development Plan and are, therefore, considering the potential of a range of sites within the District to meet its own employment requirements.

The land at Wall Heath is considered suitable to help meet the demand for employment land arising in South Staffordshire and the Black Country. The site is located within the administrative area of South Staffordshire, however, is directly adjacent to the urban edge of Wall Heath, which is within the administrative area of Dudley MBC, in the Black Country. Due to the site's proximity to Dudley, it is being promoted principally to meet the unmet employment needs of the Black Country, however, it will be down to South Staffordshire to allocate the land for development within the South Staffordshire Development Plan that is currently being reviewed.

The Vision Document, therefore, highlights the overarching need to meet the employment needs of South Staffordshire and the Black Country as a whole, by delivering a significant sized strategic employment site in a sustainable location, on the edge of Wall Heath. In doing so, it can help accommodate a significant proportion of the Black Country's unmet employment needs in a location that is well related to the main urban area and, therefore, well located to where the need is arising. The Vision Document also confirms that, following an assessment of initial baseline conditions, it is free from significant technical, physical or environmental constraints that would prevent its development.

# PLAN 1 SITE LOCATION PLAN



Site Boundary

## SECTION 3 SITE AND SURROUNDINGS

### SITE DESCRIPTION

The site is located on the northern periphery of Wall Heath, Kingswinford, a village which lies approximately 6 kilometres west of Dudley town centre. The site is approximately 71.2 hectares (see Site Location Plan).

The site comprises a number of irregular-shaped arable fields separated by mature hedgerows. The raised South Staffordshire Railway Walk with associated tree belt forms part of the site's northern boundary adding containment to the site. The Railway Walk is used as a cycle path and commuter route from Wolverhampton's Aldersley Stadium to Himley. Beyond the railway line to the north are agricultural fields and the B1476, which separates the site from the village of Himley. The eastern site boundary consists of the Wolverhampton Road and associated vegetation, whilst to the south lies the existing residential edge of Wall Heath (see Site Context Plan).

The site is shown to be generally raised above the surrounding area to the south and west, giving the appearance of an elevated plateau of land descending relatively steeply towards watercourses which are located along the northern, southern and western site boundaries. The topography within the site undulates, falling towards the northern, western and southern boundaries. The ground levels fall from approximately 82.0m Above Ordnance Datum (AOD) in the north-east to 62.5m AOD in the south.

A public right of way, known as the Himley 6 bridleway, dissects the site vertically, connecting Himley to the existing urban edge of Wall Heath to the south. A number of additional footpaths are shown on the Opportunities and Constraints Plan.

The site is strategically located near a number of settlements and employment sites within South Staffordshire District and the Black Country:

- > Himley Village 250m to the north
- > Wall Heath Village Centre 600m to the south
- > Swindon Village 700m to the west
- > Pensnett Trading Estate is approximately 1km east of the site at its nearest point. The Pensnett Estate is one of the largest secure industrial estates in Europe, comprising of 185 acres and home to almost 200 companies.
- > Wombourne Village 1.5km to the north
- > Brierley Hill Town Centre and Merry Hill shopping centre 5 kilometres to the south east
- > Stourbridge Town Centre is 6km to the south
- > Wolverhampton City Centre 8km to the north

PLAN 2 SITE CONTEXT PLAN



 Site Boundary

## SOUTH STAFFORDSHIRE LOCAL PLAN

The South Staffordshire Local Plan consists of a number of statutory and non-statutory documents that together set out the planning policies and proposals to guide the development of the District. The Local Plan comprises the Core Strategy which was adopted in December 2012 and the Site Allocations Document, which was adopted in September 2018.

### The Core Strategy

The Core Strategy is at the heart of the Local Plan and sets out the long-term vision, objectives and planning policies to deliver the vision and secure a sustainable future for the District. It has been informed by a number of strategies and assessments such as the Sustainable Community Strategy, Green Belt Assessment and Employment Studies.

The Core Strategy outlines that currently, 80% of South Staffordshire is designated Green Belt and the remaining area to the north is defined as Open Countryside. As such, Green Belt release is necessary to accommodate housing and employment growth.

South Staffordshire occupies a unique position on the edge of the West Midlands conurbation. There are around 30,000 jobs provided in South Staffordshire but many residents commute out of the District and into the conurbation and surrounding areas. Local residents rely heavily on nearby towns and cities such as Stafford, Cannock, Walsall, Wolverhampton, Dudley and Stourbridge for employment opportunities.

South Staffordshire has an important role to play in achieving economic growth within the West Midlands. The District Council has ambitions to harness the benefits that South Staffordshire has to offer by increasing employment opportunities and improving the sustainability of communities. Some Policies of note within the Core Strategy include:

#### *Core Policy 1 – The Spatial Strategy for South Staffordshire*

The general extent of the Green Belt and the area defined as Open Countryside will be protected and maintained for the Plan period, but some land will need to be released from the Green Belt and Open Countryside in some locations at the Main and Local Service Villages to deliver the proposed development strategy and enable the sustainable growth of these villages.

#### *Core Policy 7: Employment and Economic Development*

The Council, working in partnership with businesses and local communities, will support measures to sustain and develop the local economy of South Staffordshire and encourage opportunities for inward investment and further economic development of the District. The Council will support the development of creative and high technology industries at strategic employment sites in suitable locations within South Staffordshire. Measures to sustain the development of key economic sectors in the District, particularly manufacturing, storage and distribution, the service and tourism sectors will be encouraged and supported.

The Core Strategy also has a number of Strategic Objectives aiming to promote Economic Vibrancy in the District:

*Strategic Objective 9*

To meet local housing and employment needs, having regard to the Spatial Strategy for South Staffordshire, in a way that enables the existing villages within South Staffordshire to develop in a sustainable way that secures their future viability and prosperity, and supports the regeneration of rural communities and communities in neighbouring urban areas.

*Strategic Objective 10*

To support the urban regeneration of the Black Country Major Urban Area by distributing new housing and employment growth within South Staffordshire in a way that supports existing local communities and in particular discourages out-migration from the Black Country Major Urban Area.

*Strategic Objective 11*

To support the growth of a vibrant, prosperous and sustainable local economy; sustain, improve and enhance the vitality and viability of village centres and promote South Staffordshire as a tourist destination.

*Strategic Objective 12*

To support thriving and sustainable communities by ensuring that local people enjoy access to jobs and key services such as social, health care, education, open space and recreation, cultural and other facilities.

*Strategic Objective 13*

To reduce the need to travel, to secure improvements to public transport infrastructure and services and make it safer and easier for the community to travel to jobs and key services by sustainable forms of transport, such as public transport, walking and cycling.'

## SOUTH STAFFORDSHIRE DISTRICT PLAN REVIEW

A new Local Plan is being prepared which will replace the existing Local Plan and will set out the spatial planning strategy for the District up to 2037.

The SAD commits South Staffordshire to carrying out an early review of the Local Plan in order to respond to the increasing need for development, both within South Staffordshire, and in neighbouring authorities, such as the Black Country. Agreeing to an early review of the Local Plan was an essential requirement of the Government's Planning Inspector who examined the SAD and was largely in response to unmet housing needs in both South Staffordshire and the wider region. This means that South Staffordshire must submit a reviewed Local Plan by 2021, which is earlier than previously anticipated (because the current Local Plan runs until 2028).

South Staffordshire Council has no choice but to undertake a review of the Local Plan to review the existing planning policy documents and determine the new Local Plan for South Staffordshire, which will identify the development needed within the district up until 2037. This will include residential, retail and employment uses. The Local Plan will allocate the sites required to deliver the identified level of development needed.

Local Planning Authorities have a duty to cooperate with neighbouring authorities and other prescribed bodies on strategic matters that cross administrative boundaries. Strategic matters can include housing, employment, infrastructure and the Green Belt.

The Council has been working collaboratively with neighbouring authorities on cross boundary issues for a number of years. A clear example of this is the role employment allocations in the Site Allocations Document (SAD) play in meeting some of the Black Country employment needs.

- › The Issues and Options consultation was the first stage of the Local Plan review. The consultation ran from Monday 8 October until 5pm Friday 30 November 2018.
- › South Staffordshire are consulting on the second stage of the Local Plan which is focused on broad locations for housing growth and the infrastructure required to deliver the growth. The consultation runs for 8 weeks from Thursday 17 October until 5pm Thursday 12 December 2019.
- › Issues regarding employment growth will be consulted on in at the Preferred Options stage, which is scheduled for summer 2020.

### SITE ALLOCATIONS DOCUMENT

The SAD was adopted on 11 September 2018 and provides updated policy maps and policies in addition to changes to Green Belt and village development boundaries for housing, safeguarded land and employment sites.

The SAD identified land to meet development and growth needs, established new development boundaries and removed two previous 'Major Developed Sites (MDS)' from the Green Belt in line with 'Policy SAD6: Green Belt, Open Countryside and Development Boundary Amendments'. Given 80% of South Staffordshire is Green Belt, further land will need to be released to accommodate future growth requirements, through the local plan review.

## LOCAL PLAN SPATIAL HOUSING STRATEGY AND INFRASTRUCTURE DELIVERY OCTOBER 2019

The second stage of consultation for the South Staffordshire Local Plan Review is regarding Spatial Housing Strategy and Infrastructure Delivery. Its focus is on housing growth in the district, looking at broad locations for growth and the infrastructure benefits that will be delivered as a consequence.

This consultation is not site specific but looks at broad locations for growth through the different options. Some development will be at villages, but to lessen the impact on these villages, urban extensions along the western and northern edge of the Black Country have been proposed which offer the opportunity to provide self-contained development that is located close to high level services and facilities in the conurbation. The six options are as follows:

- › Scoping Option A: Rural housing growth focused on the district's larger and better-connected villages
- › Scoping Option B: Rural Housing growth dispersed across all settlements with a basic level of service provision within the district
- › Scoping Option C: Small-scale urban extensions on the fringe of neighbouring urban
- › Scoping Option D: Larger urban extensions on the fringe of neighbouring urban areas
- › Scoping Option E: New freestanding settlements away from the existing villages/urban areas
- › Scoping Option F: Introduce minimum housing densities on all housing sites and intensify development within the existing village development boundaries
- › Scoping option G: Infrastructure-led development with a garden village area of search beyond the plan period

The Council's preferred approach, is Option G which is expected to meet the districts housing requirement, as well making a contribution (under the Duty to Cooperate) to the wider unmet housing need and also take account of the impact of development on current infrastructure and what opportunities there are for new and improved infrastructure. Option G proposes that 60% of housing is focused in Tier 1 to 4 Villages (60%), with 40% of development directed towards urban extensions and rural villages. This approach will lead to Green Belt release; however, this seems inevitable in light of South Staffordshire's highly limited urban capacity.

Whilst this Vision Document has been created primarily for the promotion of land at Wall Heath as a strategic employment site, it is also CWC Group's intention to promote their land interests to the south of Himley for residential development. The land in CWC Group's control is highlighted as a 'Potential Future Housing Development' on the masterplan and could form a well contained extension to the village of Himley that could assist in meeting the housing requirement of South Staffordshire and the Greater Birmingham and Black Country Housing Market Area. As it is located directly adjacent to the existing urban boundary, the land at Wall Heath and land to the south of Himley falls within the 'Proposed Area of Search for Urban Extension' as outlined by the consultation document.

## STRATEGIC HOUSING & ECONOMIC LAND AVAILABILITY ASSESSMENT

The South Staffordshire Council Strategic Housing & Economic Land Availability Assessment (SHELAA) contains sites that have been suggested for housing or employment development.

The proposed development site has been identified as Site Ref.368, Land off Enville Road, Wall Heath. The site is considered 'Potentially suitable but subject to policy constraints - Green Belt & Core Policy 1.'

The Site Assessment text states: Site also suggested for employment, open space and community facilities. Part of site also suggested below. Currently quarry site for sand and gravel extraction. Larger part of site is cut off from access onto Enville Road to the south-west by Flood Zone 3, which cuts off this part of the site. The site is directly adjacent to the A449 to the east, which contains a lit footway leading to the Black Country urban area (Wall Heath) to the south. Therefore, on balance, the site is not considered to be disassociated from the urban edge. A PRoW runs through the site, and part of the site is within Flood Zone 3 and an SBI - these have been excluded from the gross site area, leaving approximately 62.26ha of land. Urban edge site modelled at 35 dwellings per hectare.'

## SOUTH STAFFORDSHIRE ECONOMIC DEVELOPMENT NEEDS ASSESSMENT (EDNA)

In line with the national guidance requirements, South Staffordshire's EDNA (stage 1) has undertaken an analysis of South Staffordshire's Functional Economic Market Area (FEMA) and has identified South Staffordshire as being in the same FEMA as Cannock Chase district, Dudley, Walsall and Wolverhampton. The Black Country authorities acknowledge that they have a significant unmet need for employment land for their forthcoming plan period. They are undertaking further evidence gathering to see if they can reduce this gap (including further assessment of their urban capacity and a Green Belt Review), however it is acknowledged that three of the Black Country authorities are in the same FEMA as South Staffordshire, and therefore South Staffordshire may have a role in meeting some of their unmet employment land needs.

In order to accommodate the level of growth associated with the most likely scenario, the Black Country EDNA 2017 recommends that the review should plan for up to 800 ha of additional land to meet the needs of the Black Country for the period 2014-36 within the B1(b), B1(c), B2, B8 use classes and other ancillary uses normally located within employment areas.

A significant proportion of South Staffordshire's working population travels to work outside the district. The Black Country economy, and those of other adjoining authorities, is an important source of jobs for the residents of South Staffordshire and is an important factor in the prosperity of the district. Over recent years, South Staffordshire has aspired to provide more jobs locally, reduce levels of out commuting, and provide employment for residents of neighbouring areas, such as at i54 South Staffordshire. The economic inter-relationship between South Staffordshire and the Black Country is particularly strong with a key challenge to ensure that future cross boundary employment provision is mutually beneficial.

The Council's latest evidence on employment land requirements (EDNA stage 1, 2018) has found that the district has sufficient supply of available employment land to meet its own employment requirements over the plan period to 2037, with around a 20ha surplus. Notwithstanding this surplus, it is acknowledged that South Staffordshire may have a role in meeting cross boundary employment needs, particularly for the Black Country.

## SECTION 4 ASSESSMENT OF BASELINE CONDITIONS

### INTRODUCTION

To assist with the promotion of the site, CWC Group have instructed an initial high-level assessment of baseline conditions in order to understand if there are any potential 'in principle' constraints to the development of the site, but also to identify opportunities within which to bring forward new development. As such, a high-level assessment of existing highway conditions has been undertaken in order to inform an outline access strategy for the development. In addition, landscape character and visual impact of the proposed development has been considered in order to assess the ability of the landscape to accommodate development in this location. A Flood Risk and Drainage Appraisal has been undertaken to establish the existing conditions on site and inform the developable area. Finally, an ecological walkover survey has also been undertaken in order to understand the potential of the site to accommodate any protected species and if so, the likely mitigation that may be required in order to mitigate for these.

These investigations have informed our initial thoughts on how the site could be developed, and that will be needed to be implemented in order to bring the site forward. Similarly, they have also fed into the preparation of an initial concept masterplan for the site, that seeks to identify development principles at the outset that will guide the future development of the site.

As the site is currently located in the Green Belt, we have also assessed the contribution that it makes to the five purposes of including land in the Green Belt.

## GREEN BELT

The site is currently located in the Green Belt, where there is a general presumption against inappropriate development. The Core Strategy is clear that protecting the Green Belt is a high priority for the Council, together with maintaining the distinctive local character and landscape of South Staffordshire. However, the Core Strategy is also clear that Green Belt release will be necessary to meet the growth requirements of the District.

The Policy of most relevance to landscape within the adopted Core Strategy, is Policy EQ4: Protecting and Enhancing the Character and Appearance of the Landscape which states that, 'The intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced.' It goes on to state that, 'Proposals should retain and strengthen the components of landscape character and local distinctiveness, with particular attention to the detailing of any proposal and its relationship with existing buildings, features and vegetation.'

Whilst the site is not covered by any landscape designations, it does currently lie within the Green Belt. Relevant SPD documents of note include the Staffordshire Landscape Character Assessment document. The key characteristics and landscape features of the area within which the site is located as identified by the landscape character assessment are considered in the Landscape and Visual Impacts section of this Document.

South Staffordshire undertook a Green Belt Study which was published in July 2019 to consider the potential of a number of sites to be released from the Green Belt in order to meet the future development needs of the District.

Within the study, the site falls within assessment parcel S71A, which is considered to make the following contribution to the five purposes of the Green Belt:

- › **Purpose 1: Checking unrestricted sprawl** – Strong contribution
- › **Purpose 2: Preventing merging towns** – Weak / No contribution
- › **Purpose 3: Safeguarding countryside from encroachment** – Strong contribution
- › **Purpose 4: Preserving setting and special character of historic towns** – Weak / No contribution
- › **Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land** – All of the parcels are considered to perform equally against purpose 5. It is acknowledged that Green Belt land needs to be released to meet the Councils housing and employment land requirements.

Notwithstanding the assessment of the site in the Green Belt Study, we have also assessed the site's performance against the five purposes of including land in the Green Belt (as set out in paragraph 134 of the Framework 2019).



View facing south east from the Himley 6 bridleway which dissects the site from north to south.



View facing south west from the Himley 6 bridleway which dissects the site from north to south.

## **The Sites Contribution to the Green Belt and suitability for release.**

A review of the site's performance and suitability for release is summarised below in relation to the principal Green Belt objectives as set out within the National Planning Policy Framework (NPPF) (illustrated on the Opportunities and Constraints Plan).

The assessment does not include consideration of the fifth Green Belt purpose (to assist in urban regeneration through the recycling of derelict and other urban land), as all green field land is considered to contribute equally to this purpose, with the site making an equal contribution as the other greenfield land within the Green Belt around Wall Heath making an equal contribution in this regard.

This section sets out how the site performs in relation to the first four Green Belt purposes as well as opportunities for release of Green Belt land including a new, permanent, defensible Green Belt boundary (as shown on Opportunities and Constraints Plan). Consideration is also given to the potential for enhancements of land removed from the Green Belt for improved access and recreation, as well as biodiversity and landscape enhancements.

### **Purpose 1 – To check the unrestricted sprawl of large built up areas**

The site is well contained; the South Staffordshire Railway Walk that forms part of the northern boundary is raised and is lined with tree belts and hedgerow, assisting towards the screening of views to the site from the north. To the northwest, mature tree belts assist to further screen the site with limited views possible beyond the boundary. The site sits adjacent to the existing urban extents of Wall Heath to the south adding further containment.

Considering the above, the site does not contribute to the preventing the unrestricted sprawl of Wall Heath, situated adjacent to the existing settlement edge, with development present to the west, east and north of the site and mature vegetation surrounding the site. Any sprawl would be contained by these existing surrounding features, with the South Staffordshire Railway Walk preventing the opportunity for sprawl and ensuring only a limited and localised impact. Furthermore, land to the north of the site is within the control of CWC Group, who intend on using the land as public open space, acting as a strategic green gap between the development site and Himley.



View facing south west from the Himley 7 footpath to the north of the site.



View facing east from the Swindon 2 footpath near Hinksford Farm.

## **Purpose 2 – To prevent neighbouring towns merging into one another**

The physical and visual containment of the site and the raised South Staffordshire Railway Walk to the north provides separation with adjacent towns. The site does form part of the separation of Wall Heath and Himley, a small settlement to the north, however, the South Staffordshire Railway walk ensures no connection either visually or physically is made and therefore the separation remains.

There are development opportunities for the strengthening of the boundary along the eastern edge adjacent to Wolverhampton Road. Although the site is at a higher level, enhancement of the boundary could be ensured to avoid views of the development, although building heights are to be limited towards the western, northern and eastern boundaries to help limit visibility of rooftops. The enhancement of the already mature boundary to the west would form the new, permanent Green Belt boundary, assisting to prevent visual encroachment on local settlements.

## **Purpose 3 - To assist in safeguarding the countryside from encroachment**

The site is located adjacent to the existing settlement edge of Wall Heath to the south, bound by a Road network and scattered farms and businesses with the South Staffordshire Railway Walk to the north. This places the site within an urban fringe context of existing development, limiting the contribution the site makes to safeguarding the countryside from encroachment.

Although trees and hedgerows surround the site, they are gappy in places and the opportunity exists to bolster them with new strategic tree planting, adding to the containment.

It is inevitable that some land will need to be released from the Green Belt to meet the needs of Birmingham and Black Country HMA and so some loss of open countryside will be required

## **Purpose 4 - To preserve the setting and special character of historic towns.**

There are no features of historic significance in the parcel or visible from within it. Wall Heath is not identified as a historic town of importance. Considering the above, the site does not contribute to the preservation of the setting and special character of historic towns.



View facing north from Enville Road.



View facing north from Blaze Hill Road.

## Opportunities for the Release of Green Belt

As considered above, the site makes a limited contribution to Green Belt purposes and the function of the Green Belt within the wider surrounding area. The site is contained by recognisable boundaries in the form of the raised South Staffordshire Railway Walk to the north and the mature tree belts and historic field boundaries to the west.

Although development of the site would lead to the loss of a number of arable fields, the function of the wider Green Belt in checking unrestricted sprawl and preventing coalescence of settlements would be retained. Any loss of land to development would be limited and localised.

As set out at paragraph 139 of the 2019 NPPF, when defining Green Belt boundaries, plans should 'define boundaries clearly using physical features that are readily recognisable and likely to be permanent'. The existing boundary vegetation, hedgerows and hedgerow trees, assist with enhancing the boundaries that could comfortably accommodate permanent, defensible new Green Belt boundaries and enhance those formed by the former Railway line to the north, Wolverhampton Road to the east and the farm buildings and businesses to the west.

The proposed new Green Belt boundary is shown on the Opportunities and Constraints Plan.

In addition to requiring the release of Green belt land to be clearly defined by robust new Green Belt boundaries, the NPPF also considers at paragraph 138 that 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.

Although the site does not offer the opportunity for enhancement of land retained in the Green Belt, it does offer the opportunities for enhancements through the provision of accessible open space within the proposed development. As illustrated on the Opportunities and Constraints Plan, there are further opportunities for this space to be enhanced with characteristic new structure planting to assist with filtering views of the proposed commercial development, as well as being managed for wildlife and biodiversity benefits.

The July 2019 update to the Planning Practice Guidance (PPG) provides additional information on the role of the Green Belt in the planning system to supplement Section 13 of the NPPF.

It identifies three changes; firstly identifying 'what factors can be taken into account when considering the potential impact of development on the openness of the Green Belt'. It further states how 'plans might set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements'. It finally identifies how the 'strategic policy-making authority ensure that compensatory improvements to the environmental quality and accessibility of the Green Belt can be secured'.



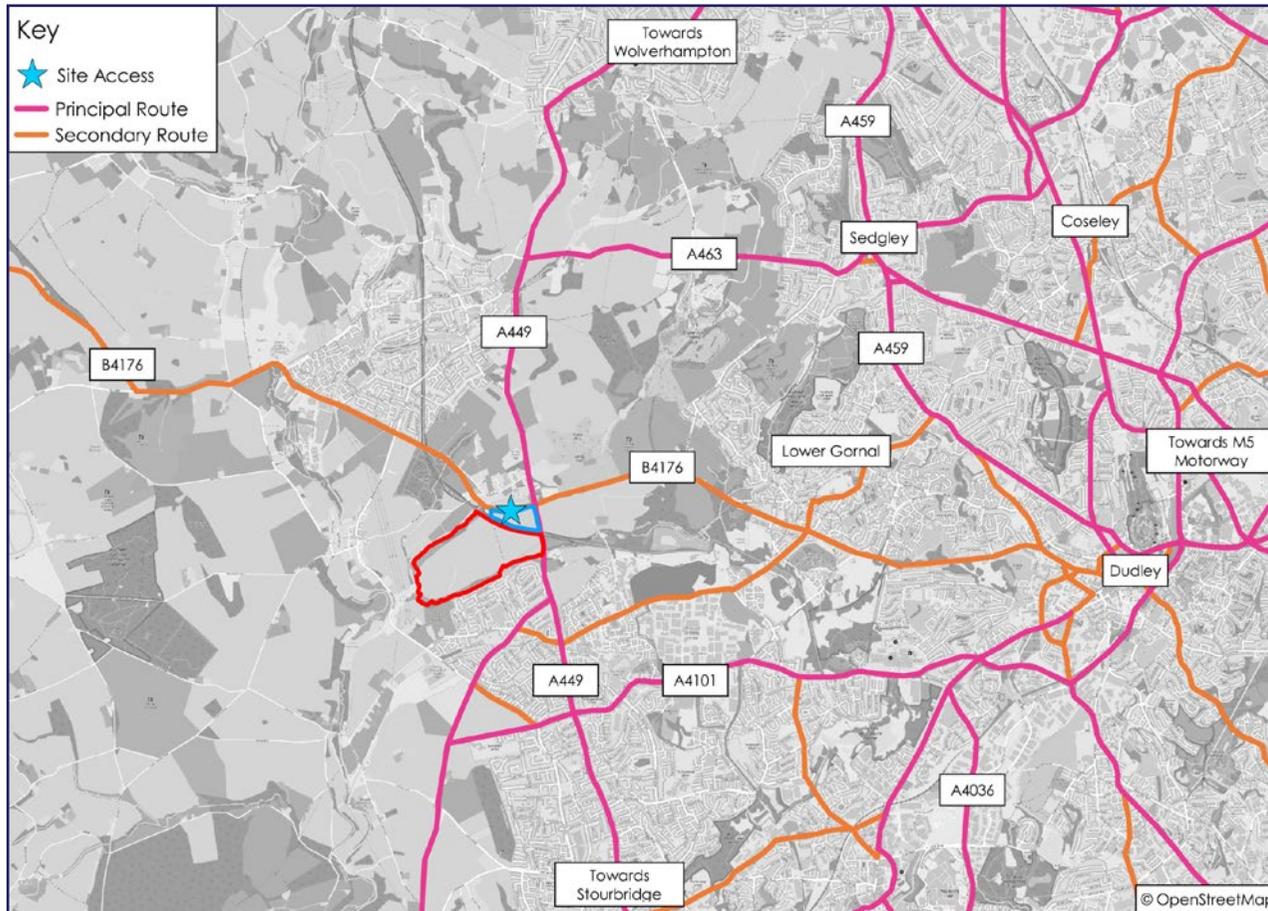
View facing east from the Himley 6 bridleway which dissects the site from north to south.



View facing west from the Himley 6 bridleway which dissects the site from north to south.

## HIGHWAYS AND TRANSPORTATION

An Access and Highway Impact Appraisal was completed to examine the transport implications of developing the Wall Heath site to provide an employment development (B1/B2/B8 use) of circa 86,701 m<sup>2</sup>.



### Existing Conditions

The proposed site is located to the south of the B4176 and to the west of the A449 Wolverhampton Road. The A449 provides a link between Wolverhampton Centre to the north east and Kidderminster to the south west. The A449 continues past Wolverhampton and provides a link to the M54 motorway at junction 2 and subsequently provides access to the strategic highway network.

The B4176 provides a link between Dudley centre to the east of the proposed development and Telford to the northwest. The junction between the B4176 and A449 comprises a four-arm signalised cross roads to the east of the proposed development site.

PLAN 4 WIDER HIGHWAY (FIGURE 1)

## Access

Primary vehicle access will be taken from the B4176 in the form of a three-arm signalised junction. A HGV vehicle tracking assessment has also been undertaken of the proposed access determining that it can accommodate the potential HGV movements.

Emergency accesses could potentially be achieved to the west of the proposed access on B4176 using the existing track, as well as via a left in/ left out arrangement on the A449 Wolverhampton Road to the east of the site if necessary, which could also form a secondary/bus only access.

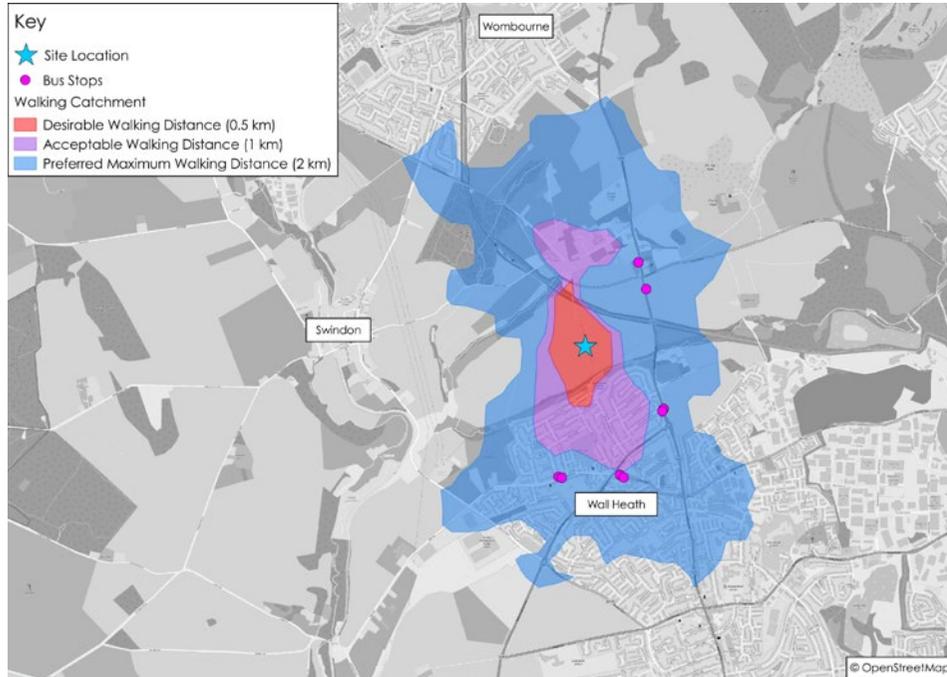


View from B4176 to the north of the site, showing the South Staffordshire Railway Walk.

## Sustainable Transport

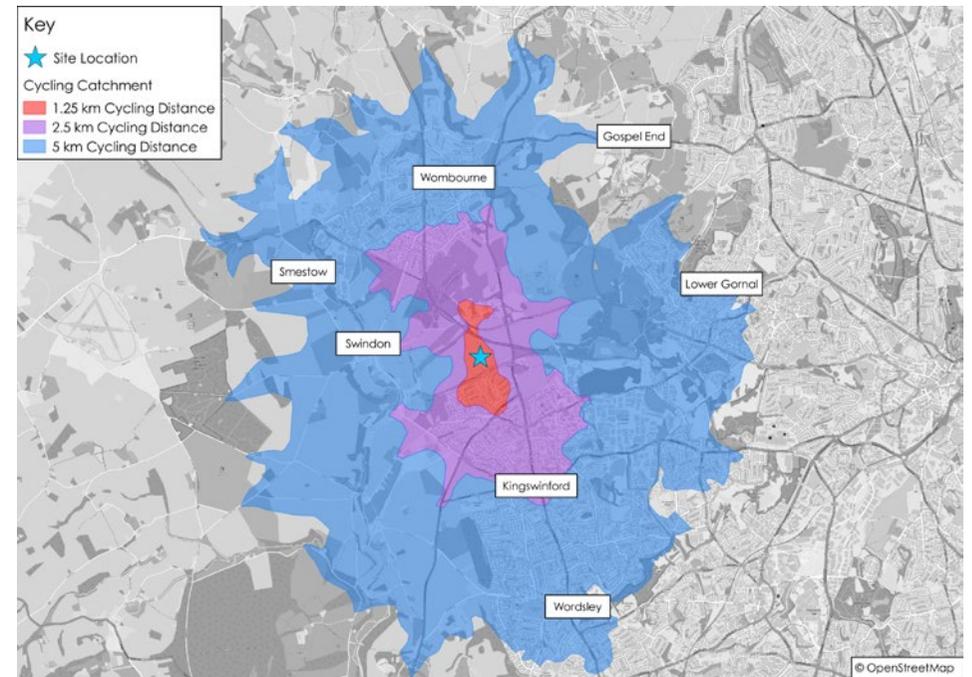
A pedestrian footway is present on the northern side of the B4176 and the eastern side of Wolverhampton Road. The South Staffordshire Railway Walk intersects the site and routes towards Wombourne to the north and Gornal Wood to the east.

Bridleway 'Himley CP 6' routes north/south through the site between the B4176 to the north and the residential estate to the south in Wall Heath.



PLAN 7 WALKING CATCHMENT (FIGURE 2)

Figure 2 shows a 2km walking catchment from the proposed development site that encompasses parts of Wall Heath to the south of the development site and extends towards Wombourne to the north.



PLAN 8 CYCLE CATCHMENT (FIGURE 3)

Figure 3 shows a 5km cycle catchment from the proposed development site that encompasses Wombourne to the north, Lower Gornal to the east, Kingswinford to the south and Swindon and Smestow to the west of the proposed development.

The nearest bus stops to the site are located on The A449 Wolverhampton Road that are served by the service number 16 Wolverhampton to Stourbridge which is operated by National Express West Midlands (**NXWM**). This service operates on a half hourly frequency Monday to Saturday. In addition, the number 15 is located to the south of the site and operates between Wolverhampton and Merry Hill Shopping Centre. This service operates with a 15-minute frequency thought the day Monday to Saturday. An hourly service runs for both the 15 and 16 on a Sunday.

Both bus services route to Wolverhampton bus station which is within convenient walking distance of Wolverhampton Railway Station. The station provides regular services to and from Birmingham.

Footway and cycleway links will be provided throughout the site to encourage active travel by the employees. These routes will also connect to the existing off-site infrastructure to allow pedestrian and cycle travel to off-site destinations. A detailed review of the walking and cycling infrastructure will be undertaken and improvements will be identified where required.

The existing bus services are located outside of convenient walking distance of some of the development parcels, and therefore a new or improved existing bus service may be required to ensure that all employees have the opportunity to travel by bus. A public transport strategy will be developed in consultation with the local bus companies and the local highway authority to identify the preferred option for serving the site. Options could include the extension of one of the existing services to loop through the site, either via an internal loop or by using two access points. Alternatively, a new service could be introduced which would route between the site and bus/railway stations at Stourbridge.

Both vehicle and cycle parking provision on site would be provided in accordance with the local parking standards.



## **Trip Generation and Distribution**

To quantify the impact of the proposed development on the local transport system, the number of vehicle trips for all modes of transport that are likely to be generated by the development should be calculated. As such, BWB forecasted the likely trips generated by all modes for the proposed development during the morning peak hour and in the evening peak hour (08:00 – 09:00 and 17:00 – 18:00).

The trip generation assessment forecast a total of:

- > 41 two-way trips for pedestrians and cyclists in the morning peak hour and 35 in the evening peak hour.
- > 371 two-way trips for car drivers in the morning peak period and 312 two-way trips in the evening peak period.
- > 75 two-way trips for HGVs in the morning peak period and 34 two-way trips for HGV's in the evening peak period.
- > 31 two-way bus trips are forecast in the morning peak period and 26 two-way trips in the evening peak period
- > 2 two-way rail trips in the morning peak period and 1 in the evening peak period.

## **Modal Split**

To provide a more accurate representation of the forecast modal split anticipated at the proposed development, the journey to work data for the daytime population has been based on the 2011 census 'location of usual residence and place of work by method of travel to work' data MSOA 'Dudley 012' that contains the Pensnett Estate that is located approximately 2.4km by road to the southeast of the proposed development and provides a similar setting to the proposed development.

The data indicates that currently approximately 83.2% of trips are made by private car with 6.7% made by public transport and 8.4% are walking / cycling trips.

## **Distribution**

Trip distribution patterns have been based on the 2011 census 'location of usual residence and place of work by method of travel to work' data MSOA 'Dudley 012'. The origins for all vehicle trips to the area were separated from the data and a percentage demand was derived for all of the destination for light vehicle driver trips using the most appropriate routes from each zone.

It is expected that 8% of trips will travel north on the A449 Stourbridge Road, 45% will use the B4176 to the east of the proposed development, 35% travel south on the A449 Wolverhampton Road and 12% travel west on the B4176.

It is expected that 36 two-way trips will travel to/from the north on the A449 Stourbridge Road in the AM peak with 28 in the PM peak, 201 trips will use the B4176 to/from the east of the proposed development in the AM with 156 trips in the PM, 156 trips will travel to/from the south on the A449 Wolverhampton Road in the AM peak with 121 trips in the PM peak and 53 trips travel to/from the west on the B4176 in the AM peak and 41 trips in the PM peak.

## **Conclusion**

In conclusion, we have considered the existing and potential future conditions and impacts of the proposed development. Consequently, there are no transport reasons as to why the site should not be allocated for employment use.

It should be noted that at this stage, this assessment has been produced to address the feasibility of the development site to inform the Local Plan. However, a Transport Assessment would also be produced as part of any future planning application.

## LANDSCAPE AND VISUAL

A Landscape Technical Note and Opportunities and Constraints Plan were undertaken following desktop analysis and preliminary fieldwork undertaken in September 2019. The note provides advice on the feasibility of future employment development in terms of landscape character and visual context. Consideration is also given to the contribution that the site makes to the Green Belt, as well as opportunities for release of the site, new Green Belt boundaries and any associated mitigation and enhancement.

### Landscape Character Context

The site is situated within the Sandstone Estatelands Character Area, described within the Staffordshire County Council's Planning for Landscape Change SPG 1996-2011.

The key characteristics of the Sandstone Estatelands include:

- > "A gently rolling, featureless landscape;
- > Remnants of silver birch woodland and heathland species present in the hedgerows;
- > Sparsely settled pattern of expanded hamlets and isolated large farms and estate buildings;
- > Straight minor roads;
- > Silver birch woodlands;
- > Well-treed stream corridors; and
- > Intensive arable agriculture in an open remnant field pattern."

Incongruous features in the area identified by the SPD include the following:

- > "Hedgerow removal along roadsides;
- > Field trees;
- > Badly designed farm reservoirs;
- > Large modern farm buildings and improved commuter properties; and
- > Power lines."

The SPD also states that there is very high potential value of new woodland planting “to restore the landscape structure of this open featureless arable farmland, to screen or direct views away from inappropriate development.”

Field observations confirm the site and surrounding locality is representative of the Sandstone Estatelands character area, although there are opportunities for enhancements within the site that would assist in providing a sympathetic characteristic settlement edge to Wall Heath.

The site itself comprises a number of irregular-shaped arable fields separated by mature hedgerows, located adjacent to the north of the existing settlement edge of Wall Heath. The mature trees associated with the watercourse along the southern boundary provide containment whilst still retaining a connection with the built residential edge. The Site Context Plan shows that to the east, Wolverhampton Road provides a strong boundary although is at a lower level than the site, surrounded by undulating topography. To the north, the raised South Staffordshire Railway Walk completes the boundary, with mature tree planting along the steep sides.

To the west, the existing farm buildings and associated businesses provide a further built-form/commercial influence to the site. Mature vegetation to the north west assists with the contained nature of the site in addition to the topography.

Hedgerows provide structure to the site, defining the open parcels of arable land, although historic maps identify the loss of historic hedgerows resulting in the larger field parcels. This provides an opportunity for the reinstatement of hedgerows to define developable parcels (as shown on the Opportunities and Constraints Plan).

## **Visual Context**

The visual envelope of the site is limited to the local surroundings due to the boundaries and surrounding mature tree and hedgerow vegetation. The topography is undulating both within the site and surrounding it, although within the area it generally stays consistent, limiting the possibility of distant views.

Local views into the site are obtained from the raised South Staffordshire Railway Walk (a long distant route which borders the site to the north) when facing south/southwest; trees and boundary hedgerows assist to filter views directly into the site at certain points, although gaps provide clear views of both the site and of the existing residential edge to the south. Although the former railway route allows for views for recreational users of the footpath, due to it being raised with planted sides, visibility towards the site from the north are screened.

The Himley 6 bridleway dissects the site from north to south, facing south east and south west. The site is generally flat but expansive in these locations. The mature tree belt on the north, east and southern site peripheries, for the most part screens the site from views inwards.

The closest conservation area lies to the north east of the site at Himley although due to intervening vegetation and the road network, the site is not intervisible with the conservation area. However, roofs of proposed development could potentially be visible, although the Himley Conservation Area document identifies no key views that need to be retained or protected; simply the buildings and features within the area that must be protected.

## Recommendations and Summary Conclusion

'A series of recommendations are set out on the Opportunities and Constraints Plan relating to the desktop study and field observations undertaken to date.

In summary:

- › Development of the site presents an opportunity to restore lost field boundary vegetation with characteristic hedgerow planting. This could be used to influence the development layout whilst improving biodiversity benefits;
- › Development set-back with areas of additional tree and hedgerow planting required at the site's eastern, northern and western boundaries to assist with the filtering of development above existing boundary trees from Wolverhampton Road and public areas/routes to the west and north;
- › Large area of public open space, with the potential for additional soft landscaping and new Green Infrastructure links through the site;
- › Opportunity to incorporate footpath links to the wider footpath network (South Staffordshire Railway Walk);
- › Building heights/zones to be sympathetic of the surrounding landscape, with heights limited to the northern, western and eastern edges to limit visibility above boundary vegetation etc;
- › Opportunity incorporating SuDS and biodiversity benefits and form part of an open space through the development linking with other spaces across the site; and
- › Retained mature tree planting/hedgerows will continue to provide biodiversity benefits and improve the visual appearance of the commercial additions within the site.

PLAN 9 OPPORTUNITIES AND CONSTRAINTS PLAN



-  Site Boundary
-  Potential Developable Area
-  Potential Area for Public Open Space/  
Green Infrastructure/RPA Off-sets
-  Existing Public Right of Way
-  South Staffordshire Railway Walk
-  Existing Internal and Boundary Hedgerows/  
Trees to be Retained Where Possible
-  Proposed Tree Planting
-  Indicative Proposed Open Space Tree  
Planting
-  Grade II Listed Building
-  Existing Retained and Enhanced  
Hedgerows
-  Proposed Hedgerows
-  New Permanent Green Belt Boundary
-  Potential Location for Access



View facing south west from the South Staffordshire Railway Walk.



View facing south from the South Staffordshire Railway Walk.

## ECOLOGY

A Preliminary Ecological Appraisal (PEA) has been undertaken, which included an Extended Phase 1 Habitat Survey of the site in October 2019 by a suitably experienced ecologist. Desk-based consultation was also undertaken with Staffordshire Ecological Record Centre and EcoRecord for records of protected species and habitats within 2km of the site. The purpose of the PEA is to identify the potential ecological constraints within, or near the site, that should be considered within the future scheme design. It also seeks to identify the likely requirement for further surveys required to inform an ecological assessment accompanying a future planning application.

### Methodology

The desktop study was undertaken in October 2019 and included:

- › EcoRecord and Staffordshire Ecological Record Centre (SERC),
- › Multi Agency Geographic Information for the Countryside (MAGIC) website,
- › Ordnance Survey (OS), and
- › Aerial imagery.

The geographical extent of the search area for biodiversity information was related to the significance of sites and species and potential zones of influence which might arise from development within the site. For this site the following search areas were considered to be appropriate:

- › 10km around the site boundary for sites of International Importance (e.g. Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site));
- › 2km around the site boundary for sites of National or Regional Importance (e.g. Sites of Special Scientific Interest (SSSI)), protected or otherwise notable species and non-statutory designated sites of County Importance (e.g. Local Wildlife Sites (LWS));
- › 1km for ancient woodland, and
- › 2km for biological records (post-2000).

On 11th October 2019, HLPC carried out an Extended Phase 1 Habitat Survey of the site. The survey was carried out by HLPC Principal Ecologist and was undertaken in accordance with 'Extended Phase 1' methodology Joint Nature Conservation Committee (2010) Handbook for Phase 1 Habitat Survey. A Technique for Environmental Audit. Specific habitat features were mapped using Target Notes (TN) to record ecological features of particular note.

## Ecological designations

### *Internationally designated sites for nature conservation*

Fens Pool SAC, located approximately 3.5 km south-east of the site, supports a variety of terrestrial and aquatic/semi-aquatic habitats and is primarily designated for supporting a large population of great crested newts.

Fens Pool SAC is considered to be of international importance to nature conservation.

### *Nationally designated sites for nature conservation designation*

South Staffordshire Railway Walk, a site nationally designated as a Local Nature Reserve (LNR), is located adjacent to the north-east of the site. The LNR comprises woodland with small areas of scrub, tall herb and fen and grassland which support a variety of bird species.

Wom Brook Walk LNR is located 1.9km to the north of the site. The LNR consists of a brook, woodland and open spaces which support a range of bird species and water vole.

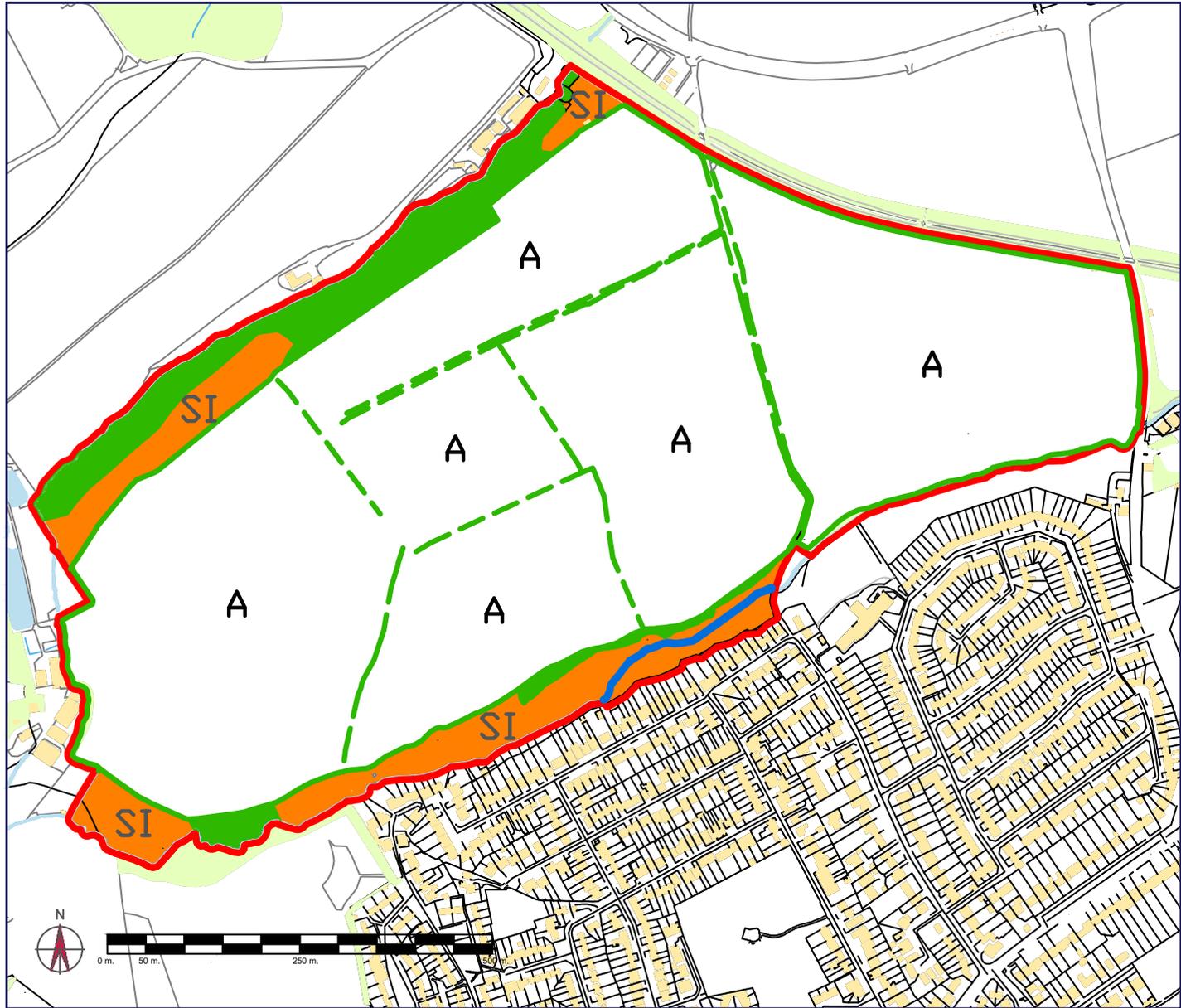
These sites are considered to be important for nature conservation at a district-national level.

### *Non-statutorily designated sites for nature conservation designation*

32 non-statutorily designated sites for nature conservation (Local Wildlife Sites (LWS), Biodiversity Alert Sites (BAS), Sites of Importance for Nature Conservation (SINC), Sites of Local Importance for Nature Conservation (SLINC) and Potential Sites of Importance (PSI)) were identified within 2km of the site. The closest sites are:

- › Himley Fields (land at), Hinksford Farm LWS which is located on site, along the northern boundary and is designated for woodland, scrub, tall herb and fen, grassland, swamp, open water.
- › Kingswinford Railway Walk, a retained BAS, which is located adjacent to the north-east of the site and is designated for woodland, scrub, tall herb and fen, grassland.
- › Holbeache Brook Valley SLINC, which is located adjacent south-east of the site and is known for wooded stream valley and adjacent grassland forming a habitat corridor link with the Staffordshire Countryside.

PLAN 10 PHASE 1 HABITAT MAP



**NOTATION:**

-  Application boundary
-  Arable
-  Semi-improved grassland
-  Broad-leaved woodland
-  Hedgerow defunct
-  Hedgerow intact
-  Watercourse

## Summary of Assessment

Depending on the location and extent of the works, Staffordshire Railway Walk LNR (which forms the sites north-eastern boundary), Himley Fields LWS (which is on site along the northern boundary) and Holbeache Brooke Valley SLINC (which is adjacent to the south-east of the site) could be affected by future development of the site. No other statutory designated sites, non-statutory designated sites or ancient woodlands are anticipated to be negatively affected by the proposed scheme.

The site has potential to support great crested newt, reptiles, bats, badger, water vole, otter, white-clawed crayfish and nesting birds. Depending on the location, timings and extent of the works, recommendations have been made for great crested newt, reptile, bat, badger otter and water vole surveys ahead of site preparatory works. Vegetation removal should avoid the nesting bird season which runs from March to August inclusive, or alternatively be preceded by a nesting bird check from an experienced ecologist. The invasive non-native species Himalayan balsam is also present at the boundaries of the site. Biosecurity and management of this species will need to be considered.

This suite of ecology surveys would be required to inform the design of a proposed development at this site. Whilst any exact mitigation requirements would be determined by the outcome of these surveys, a proposed scheme could be designed to mitigate impacts and provide ecological enhancements at a local level. It is, therefore, anticipated that a development could be planned for this site that would be compliant with current local and national planning policy.

## Conclusions

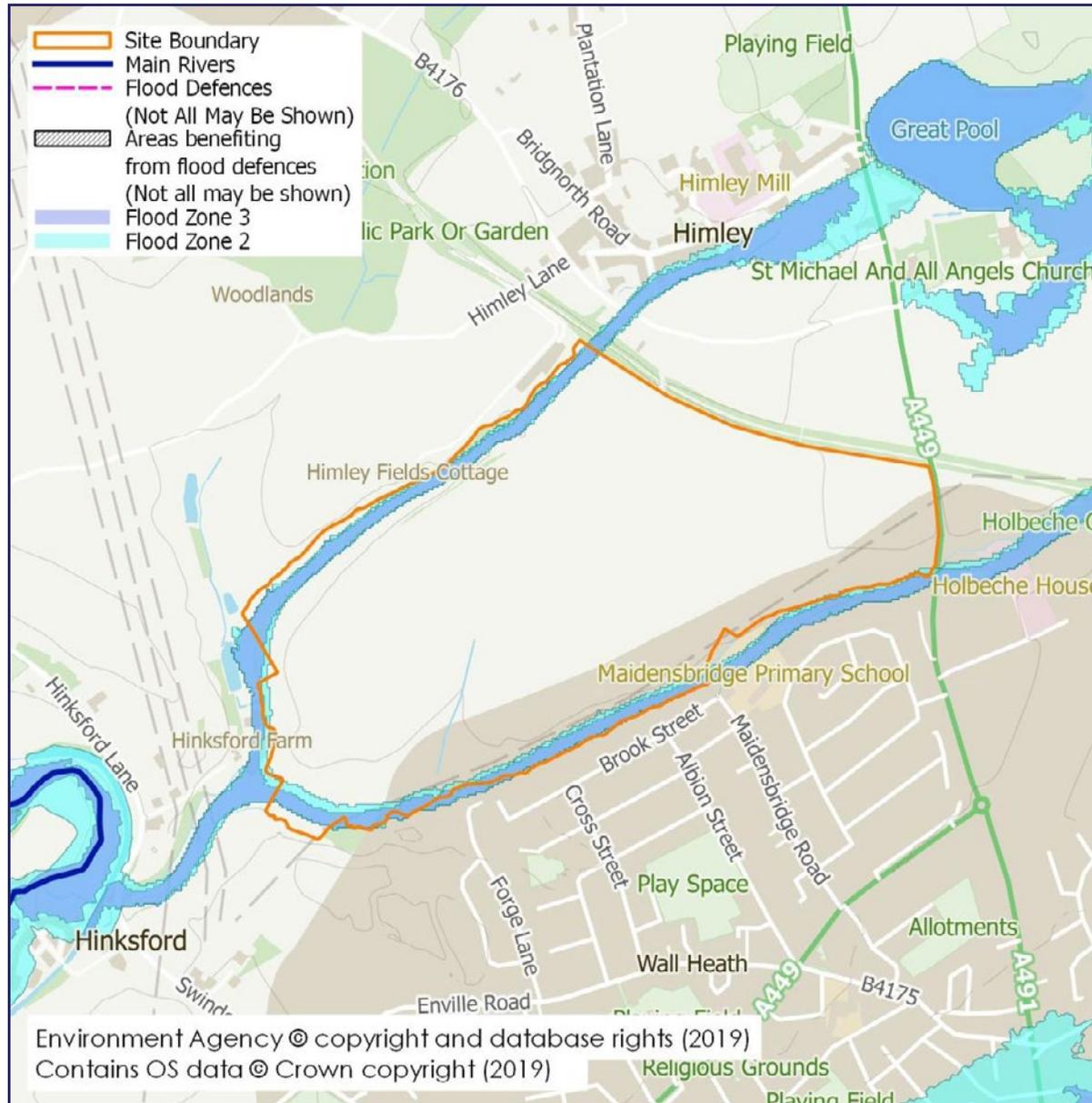
Any development scheme proposed in the future is not anticipated to have a significant impact on any site designated for its nature conservation interest, either at international, national or local level. The proposed scheme could be designed to mitigate impacts to protected species and habitats and provide ecological enhancements at a local level. It is, therefore, anticipated that a masterplan could be brought forward for this site that would be compliant with current local and national biodiversity planning policy.

## FLOOD RISK AND DRAINAGE

A Flood Risk and Drainage Technical Note (TN) was created to provide a high-level review of readily available desktop information relating to flood risk and drainage for a proposed employment development at Wall Heath.

- › Environment Agency mapping indicates that the site is located predominantly within Flood Zone 1. There are two unnamed ordinary watercourses which run along the northern, western and southern site boundaries. There are Flood Zones 2 (Medium Probability) and 3 (High Probability) associated with these minor watercourses which extend into the peripheries of the site only. The vast majority of the site is elevated and not at flood risk. The Smestow Brook is an EA Main River which flows in a south-easterly direction approximately 260m from the southern site boundary and is elevated circa 5m lower than the site.
- › Other sources of flood risk; pluvial, reservoir, groundwater and sewer flooding have been assessed and are considered to pose a low flood risk to the site.
- › The site is sloping and undulating in nature. Open source EA DTM LiDAR height data indicates that there is a fall across the site from approximately 82.0m AOD in the northeast to 62.5m AOD along the southern site boundary. It is considered that a strategic earthworks exercise will be required as part of the proposals to establish the formation levels for the development plateaus and highlight areas that are not developable, this will in-turn help to inform the drainage from a levels perspective when this is carried out at a later stage in the consultation process.
- › The site is indicated to be underlain by a permeable bedrock geology and there is the potential for runoff to infiltrate into the ground particularly within the upper layer of superficial deposits across the central portion of the site. However, infiltration potential within the bedrock geology is indicated to be less favourable within the Wildmoor Sandstone Member. A high-level review of surface water drainage has been undertaken assuming that infiltration is not viable. Site specific testing will need to be undertaken in-line with the latest guidance to confirm if there is potential use for Soakaways at the site and as the site is underlain by a Principal Aquifer. Site Investigations will be required to determine potential Groundwater levels and associated flood risk.
- › It is considered a gravity connection could be established to the nearby watercourses to intercept the proposed surface water flows from the development. The LLFA would expect discharge from the site to be restricted to the equivalent greenfield rate where practicable although ensuring that a minimum rate is met to avoid risk of blockage scenario. Surface water storage will be required and in consideration of national guidance and classification of use, this would need to be afforded up to the 1 in 100yr plus 20% climate change event. Outline calculations have been undertaken and indicative basin locations and rates have been shown on the constraints mapping provided.

PLAN 11 ENVIRONMENT AGENCY FLOOD MAP FOR PLANNING (FIGURE 2.1)



- > It is recommended that other SuDS features are incorporated into the masterplan, in addition to the main storage features and as part of a Drainage Strategy, to provide multiple levels to the treatment train and control surface water runoff as close to source as possible. These could include, but are not limited to, oil separators and channel drains for service yard areas, gravel trenches and permeable paving within the site access and landscaping as well as additional above ground treatment in the form of linear swale features or bio-retention areas.
- > Utilities plans obtained from Western Power Distribution and Cadent Gas indicate that there are both overhead power lines and high-pressure gas mains crossing the site. These will require suitable standoff in accordance with the appropriate regulatory bodies and will inform both the final layout of the masterplan and the location of above ground attenuation features. Suitable safety precautions should be in-place before any works take place on-site.
- > Given the greenfield nature of the existing site, a new foul connection to the public sewer network will be required. Based upon the LiDAR and the distance to the nearest available public foul sewer it is likely that a pumped solution will be necessary. There is known to be a sewerage treatment works approximately 30m to the north of the site just north of the Staffordshire Railway Walk, however further details will be required to understand if a foul connection is viable. It is understood due to the scale of the development that sewer modelling will be required to ensure the proposed development can be accommodated, which may result in the requirement for downstream improvement to the sewer network in order to make a connection viable.

# PLAN 12 FLOODING AND DRAINAGE CONSTRAINTS PLAN



## SECTION 5 CONCEPT MASTERPLAN

The Concept Masterplan has been informed by the initial high-level review of baseline conditions and sets out the broad design principles and parameters to guide future development at the site.

### Development Proposals

- › Deliver in the region of approximately 84,844 m<sup>2</sup> of employment floorspace providing an appropriate mix of B1, B2 and B8 employment uses.
- › Integrated access and movement strategy facilitating new accesses into the site and through it, and linking in to the existing highway network.
- › Establishment of new comprehensive footway and cycleways, including the creation of greenways through the development.
- › Retain, reinstate and enhance internal boundary hedgerows.
- › Retain trees and implement new planting where possible.
- › Provision of an area of accessible public open space to the north, forming a strategic gap between the site and the village of Himley.
- › Link the proposed employment site at Wall Heath to a potential future residential development site to the south of Himley.
- › Maximise connectivity between site and existing residential communities to the north and south.
- › To provide a substantial green buffer around the site which would protect the amenity of local residents in addition to wildlife habitats.
- › Protecting existing wildlife habitats on site and providing a net gain in biodiversity.
- › Enhancing access to the village of Himley and a potential future residential development.
- › Delivery of comprehensive sustainable urban drainage scheme incorporating attenuation features to accommodate surface water runoff and discharges into existing watercourse at greenfield runoff rates.

PLAN 13 CONCEPT MASTERPLAN



**bhb**  
architects

3533 - Wall Heath, Staffordshire  
Drawing SK03  
Indicative Site Plan  
Scale 1:2500 @ A1  
07 / 11 / 2019

APPROXIMATE AREA SCHEDULE - NOVEMBER 2019

UNIT	TYPE	GROSS OFFICES GIA		NIA OFFICES APPROX		GROSS W'HOUSE GIA		BUILDING TOTAL GIA		LEVELS	1 PER 1250FT	1 per 30m2 Offices
		m <sup>2</sup>	ft <sup>2</sup>	m <sup>2</sup>	ft <sup>2</sup>	m <sup>2</sup>	ft <sup>2</sup>	m <sup>2</sup>	ft <sup>2</sup>			
A1	Offices	2,787	30,000	2,230	24,000	0	0	2,787	30,000	3		93
A2	Offices	1,858	20,000	1,486	16,000	0	0	1,858	20,000	3		62
A3	Offices	1,858	20,000	1,486	16,000	0	0	1,858	20,000	3		62
A4	Offices	836	9,000	669	7,200	0	0	836	9,000	2		28
A5	Offices	836	9,000	669	7,200	0	0	836	9,000	2		28
A6	Offices	975	10,500	780	8,400	0	0	975	10,500	2		33
A7	Offices	1,115	12,000	892	9,600	0	0	1,115	12,000	2		37
A8	Offices	836	9,000	669	7,200	0	0	836	9,000	2		28
A9	Offices	836	9,000	669	7,200	0	0	836	9,000	2		28
A10	Offices	1,115	12,000	892	9,600	0	0	1,115	12,000	2		37
B1	Warehouse	232	2,500	0	0	4,413	47,500	4,645	50,000	2	40	
B2	Warehouse	186	2,000	0	0	3,530	38,000	3,716	40,000	2	32	
B3	Warehouse	139	1,500	0	0	2,648	28,500	2,787	30,000	2	24	
B4	Warehouse	186	2,000	0	0	3,530	38,000	3,716	40,000	2	32	
B5	Warehouse	279	3,000	0	0	5,295	57,000	5,574	60,000	2	48	
B6	Warehouse	139	1,500	0	0	2,648	28,500	2,787	30,000	2	24	
B7	Warehouse	244	2,625	0	0	4,634	49,875	4,877	52,500	2	42	
B8	Warehouse	441	4,750			8,385	90,250	8,826	95,000	2	76	
B9	Warehouse	186	2,000			3,530	38,000	3,716	40,000	2	32	
B10	Warehouse	139	1,500			2,648	28,500	2,787	30,000	2	24	
B11	Warehouse	139	1,500			2,648	28,500	2,787	30,000	2	24	
B12	Warehouse	279	3,000			5,295	57,000	5,574	60,000	2	48	
B13	Warehouse	279	3,000			5,295	57,000	5,574	60,000	2	48	
B14	Warehouse	546	5,875			10,370	111,625	10,916	117,500	2	94	
B15	Warehouse	175	1,888			3,332	35,863	3,507	37,750	2	30	
Total		16,642.4	179,137.5	10,442.3	112,400.0	68,201.3	734,112.5	84,844	913,250.0		618	435

Gross Development Total Ft<sup>2</sup> = **913,250.0**  
 Gross Development Total M<sup>2</sup> = **84,843.8**

**Note** schedule relates to drawing SK03

## SECTION 6 CONCLUSIONS

This Vision Document has been prepared on behalf of CWC Group to support the promotion of land at Wall Heath for a new strategic employment site extending to approximately 84,844 m<sup>2</sup> of employment floorspace providing an appropriate mix of B1, B2 and B8 employment uses with new public open space and landscaping. The site is located within the administrative area of South Staffordshire District although physically it is related to the built-up edge of Wall Heath, Dudley, within the Black Country, which lies immediately to the south of the site.

The need for the development stems from the inability of neighbouring authorities, such as the Black Country to be able to meet in full its own employment land needs within its own administrative area. In order to accommodate the level of growth associated with the most likely scenario, the EDNA recommends that the review should plan for up to 800 ha of additional land to meet the needs of the Black Country for the period 2014-36 within the B1, B2, B8 use classes and other ancillary uses normally located within employment areas. South Staffordshire has a close functional relationship with the Black Country and is well placed to accommodate their unmet employment requirement through the duty to co-operate.

South Staffordshire Council is currently reviewing its Development Plan in order to identify additional housing and employment sites to meet its own growth requirements, that were not available at the time that the Plan was adopted. As part of the review, the Council are also looking at how it could also meet the wider unmet housing needs of the Black Country. To facilitate the review, the Council are considering amendments to the Green Belt in the District in order to release land for housing and employment.

The land at Wall Heath is, therefore, being promoted at this time to ostensibly contribute to meeting the unmet employment needs arising in the Black Country, albeit that the site is in South Staffordshire. The location of the site on the edge of the built-up edge of Dudley, within the Black Country makes it wholly suited to meeting Black Country's needs by directing new employment land to where it is needed.

Whilst this Vision Document has been created primarily for the promotion of land at Wall Heath as a strategic employment site, it is also CWC Group's intention to promote their land interests to the south of Himley for residential development. The land in CWC Group's control is highlighted as a 'Potential Future Housing Development' on the masterplan and could form a well contained extension to the village of Himley that could assist in meeting the housing requirement of South Staffordshire and the Greater Birmingham and Black Country Housing Market Area.

To assist the promotion of the site, initial high-level assessments of baseline conditions have been undertaken which indicate that there are no technical, physical or environmental constraints that would prevent the development of the site. These assessments have also helped identify opportunities and constraints to guide the masterplanning of the site and to inform evolving transportation, landscaping, biodiversity and drainage strategies for the site.

The site will deliver a significant amount of employment floorspace over a number of years that will make an important contribution to meeting the employment needs of the HEMA. Whilst this is a significant benefit that weighs in favour of the site, a number of other benefits will also be delivered through its development including the provision of new public open space and pedestrian routes. Similarly, a development of this size and scale will deliver a number of economic benefits in terms of the development itself, in addition to construction jobs.

The proposed development will, therefore, make a significant contribution to the delivery of sustainable development. CWC Group are committed to its ongoing promotion and welcome the opportunity to continue engaging in a meaningful manner with the respective Council's through the preparation of their Local Plans.

VISION DOCUMENT PREPARED BY

**harrislamb**  
PROPERTY CONSULTANCY

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

**Birmingham (City)**

5th Floor, 1 Newhall Street, Birmingham, B3 3NH  
T 0121 308 9570  
Birmingham@pegasusgroup.co.uk  
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