SOUTH STAFFORDSHIRE COUNCIL
SOUTH STAFFORDSHIRE LOCAL PLAN

EXAMINATION OF THE
SITE ALLOCATIONS DOCUMENT

MATTERS, ISSUES & QUESTIONS
FOR EXAMINATION

MATTER 4 – SITE-SPECIFIC MATTERS,
INCLUDING PROPOSED SITE ALLOCATIONS

HOUSING, SAFEGUARDED LAND, GREEN BELT,
DEVELOPMENT BOUNDARIES

4.17 WOMBOURNE
Matter 4:

**SITE-SPECIFIC MATTERS, INCLUDING PROPOSED SITE ALLOCATIONS [HOUSING, SAFEGUARDED LAND, GREEN BELT, DEVELOPMENT BOUNDARIES, EMPLOYMENT AND GYPSY & TRAVELLER SITES]**

Key issue:
Are the proposed site allocations fully justified, suitable and available for the proposed development, sustainable, developable and deliverable within the plan period; where Green Belt boundaries are proposed to be amended to release land for development or Safeguarded Land, have exceptional circumstances been demonstrated; and are the site-specific requirements necessary, effective and justified?

4.17 Wombourne – Settlement Summary

The Site Allocations Document is proposing the delivery of a minimum of 179 dwellings at Wombourne and the identification of 14.1 hectares of safeguarded land. In Wombourne following an initial sieving where sites that did not conform to the spatial strategy were discounted, 16 sites were consulted on at the initial Issues and Options stage in March 2014 [SD51d], 3 of which gained planning approval during the plan preparation process. A further 7 sites were identified and were the subject of consultation at the Additional Issues and Options stage in August 2014 [SD60].

Six of the sites were situated within the development boundary and 17 were situated in the Green Belt adjacent to the settlement boundary. Three of the sites within the settlement boundary were subsequently granted permission and this contribution was discounted from the overall settlement requirement. Uncertainties regarding the deliverability of the remaining urban sites have resulted in these locations not being identified at this present time as development options. A total of 10 sites were considered to have performed sufficiently well against the Tier 1 criteria to merit Tier 2 assessment.

Following Tier 1 and 2 assessment, 3 sites (281a, 302, 283) were identified to be consulted on as preferred option sites for Wombourne, and a further 2 areas of land for safeguarding. Safeguarded land proposals comprised 1 parcel of land which was an extension to site 283, the other a separate site, 416 which lies within a parcel of land judged as making relatively lesser contribution to Green Belt purposes than other sites. The sites selected were those which had performed best against the assessment criteria and were considered capable of being delivered. Site 302 was the best performing of the greenfield site options, however it is not of a scale capable of meeting the full housing requirement, therefore an additional greenfield site, 283 has also been identified. A third site [281a] within the settlement boundary has also been proposed, though this site already has the benefit of outline planning permission.

Following Preferred Options consultation, all sites were re-assessed and the eastern portion of Site 283, initially identified as one of the preferred safeguarded land options for Wombourne, was removed as a site option. This is due to concerns which were highlighted about the safeguarded land element, including the risk of promoting coalescence with the settlement of Himley, the high landscape sensitivity of the proposed safeguarded land element of the site and the potentially detrimental impact in terms of the historic environment.
Furthermore, as a result of the representations made to the Preferred Options consultation, the Council revised its approach to the quantum of safeguarded land required in the Publication SAD. This meant that further land was required and this together with the loss of safeguarded land at site 283 meant that it was necessary to consider additional site options in Wombourne for safeguarded land. It was therefore decided to promote site(s) 459, 285 and 415 as replacement safeguarded land site prior to the release of the Publication version of the plan.

Site 302 is considered large enough to accommodate open space and community benefits, and offers opportunities to use well established natural boundaries and the site has good access onto the A449 and into the village. Site 283 has the capacity to provide new open space and the site has good access on to the A449. Site 281a already has the benefit of planning permission but it was considered necessary to allocate the site to ensure it comes forward for housing and it forms part of a wider site with no current planning permission. The three sites 459, 285 and 415 are clustered in close proximity to the west of Wombourne. It is considered that the three sites together offer the opportunity for a planned integrated development and would provide potential community infrastructure benefits including additional open space provision which will be considered through the review of the Local Plan. Site 416/461 was considered to offer potential improvements to community safety/road safety along Orton Lane.

Whilst sites changed between the Preferred Options and Publication Plan stages, all sites and their respective assessments were subject to consultation through the Issues and Options and Additional Sites consultations, in accordance with the Council’s Statement of Community Involvement (SCI).
a. **Land off Ounsdale Road, Wombourne** (281a)
   (Housing)

  i. Are the reasons for selecting the site soundly based; has the site assessment process identified and addressed all relevant considerations, including, where applicable, impact on the local road network, environment, landscape, historic environment, heritage assets, residential amenity and wildlife, adequacy of infrastructure/services, flood risk, land stability/contamination, proximity to mineral operations, noise and pollution and capacity/size of the site; and is the site suitable, available, justified, sustainable, developable, deliverable, viable and soundly based?

  **Council Response**

  The site has been granted outline planning permission. The site is an urban brownfield location and therefore sequentially the most preferable location as identified in the adopted Core Strategy. Issues regarding potential impacts will be dealt with through the Development Management process.

  ii. Are the site-specific planning requirements necessary, effective and justified, including, where applicable, pedestrian and vehicular access, landscape, open space, boundary treatment, flood risk, drainage, transport assessment and road/junction improvements, boundary treatment and contributions to education/road improvements?

  The site assessment process identified a number of issues in relation to this selected option which have informed the site development requirements as identified in the individual site proformas. It is expected that these issues will be addressed in order to ensure the successful delivery of this site. The areas which were identified as requiring particular attention were:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicular access off Giggetty Lane</td>
<td>To provide a suitable and safe site access.</td>
</tr>
<tr>
<td>Pedestrian access to connect to existing pavement network</td>
<td>To provide a suitable and safe site access.</td>
</tr>
<tr>
<td>Regard to adjacent Canal Conservation Area.</td>
<td>To provide protection for the setting of a designated heritage asset.</td>
</tr>
<tr>
<td>Sustainable drainage scheme as part of masterplanning.</td>
<td>Identified as a mitigation measure in Table 3.2 of the SA [SD10].</td>
</tr>
<tr>
<td>Connectivity to existing open space.</td>
<td>To ensure safe, effective pedestrian links to facilities and services, existing built development and local green spaces and play facilities.</td>
</tr>
<tr>
<td>Development to be delivered in accordance with appropriate flood amelioration scheme</td>
<td>To address the identified on-site surface water flooding issue.</td>
</tr>
<tr>
<td>Satisfactorily address the potential for contaminated land on site.</td>
<td>To ensure that there no public health concerns related to site pollution or land stability.</td>
</tr>
<tr>
<td>Development to explore improvements to Warstones Brook</td>
<td>Environment Agency requirement.</td>
</tr>
</tbody>
</table>
through deculverting and renaturalisation.

The Council considers that the requirements for Site 281a are necessary to make the development acceptable and to mitigate impacts of development.

**iii. Where the site is being released from the Green Belt for development or Safeguarded Land, have the exceptional circumstances for releasing the site from the Green Belt been fully demonstrated, and would the release of the site prejudice or conflict with the purposes of including the site within the Green Belt?**

**Council Response**

Urban brownfield site therefore no conflict with Green Belt purposes.
b. **Land north of Beggars Bush Lane, Wombourne** (302)
   (Housing/Green Belt/ Development Boundary)

i. Are the reasons for selecting the site soundly based; has the site assessment process identified and addressed all relevant considerations, including, where applicable, impact on the local road network, environment, landscape, historic environment, heritage assets, residential amenity and wildlife, adequacy of infrastructure/services, flood risk, land stability/contamination, proximity to mineral operations, noise and pollution and capacity/size of the site; and is the site suitable, available, justified, sustainable, developable, deliverable, viable and soundly based?

**Council Response**

The site has been assessed and evaluated in accordance with the Council’s published Methodology and the site selection process considered the potential impact against a range of Tier 1 and Tier 2 criteria which are set out in the Council’s Methodology Paper [SD21]. The site is a sustainable location, situated adjacent to the boundary of the existing settlement edge of a Main Service Village in accordance with the strategy identified in the adopted Core Strategy Policy CP1. It has been considered against the sequential approach to site selection as identified in the para 6.20 of the Core Strategy. A number of sites located within the settlement boundary were identified at the Issues and Options stage. Those sites which were considered to be deliverable have during the process of plan formulation gained the benefit of planning permission and have been taken into account when determining the level of residual site provision required to meet the needs of Wombourne during the plan period. Those remaining deliverable sites within the development boundary which are suitable and available for development are proposed as housing allocations (as set out in [SD07]); however these sites aren’t sufficient to meet the remaining allocation for Wombourne. Therefore greenfield (Green Belt) options are needed to deliver the Core Strategy.

The site was the best performing greenfield site option in relation to the site assessment process however a number of potential issues where identified which will merit attention during the drafting of detailed scheme proposals. These issues have informed the requirements identified in SAD9 and the detailed site specific requirements included as Appendix 1 [SD01].

**Local Road Network**

Concerns have been expressed about the accessibility of the site and its relationship to the surrounding road network, in particular Beggars Bush Lane, which is a narrow road adjacent to the site boundary and the identified access point for the site. Potential measures have been considered to address this issue including possible carriageway widening or the provision of passing places. The developers and the Highways Authority have assured the Council that these measures are capable of being implemented and that the site can be delivered, and the requirements to secure a satisfactory road improvement scheme has been identified in the Site Allocation Document [SD01] proforma for this site.

**Environment and Landscape**

The site is identified as comprising predominantly Grade 3 quality agricultural land. Whilst attention is given towards protecting wherever possible the higher grades of agricultural land from development it was recognised in the Council’s SHLAA [SD79] that the presence of such high quality agricultural land is so extensive in certain parts of the district as to severely limit the potential for development. It was therefore determined to seek to protect Grade 1 quality land
and direct developers to minimise the loss of the other better quality grades when drafting detailed scheme proposals [Policy SAD9].

The site is located within an area considered to have low landscape sensitivity and relates well to the existing settlement pattern.

**Historic Environment and Heritage Assets**

Historic site assessment has been informed by the South Staffordshire Historic Environment Character Assessment [SD096] and confirmed by the South Staffordshire Historic Environment Site Assessment (HESA) [SD097]. The area is dominated by field systems which have been substantially altered into the mid to late 20th century; however some historical field boundaries have survived. Two Grade II Listed Buildings, a Grade II Registered Park and Garden and two Conservation Areas are located within 400 metres of the site. The Historic Environment Site Assessment established that there was no intervisability between the site and the Listed Buildings or the Wombourne Conservation Area and that therefore no effects on setting were predicted. There is however a measure of intervisibility with Himley Hall Estate which has dual Conservation Area and Grade II Registered Park and Garden status. The proposed housing site is however only intervisible with the outlying portions of the estate and is clearly segregated from it by the A449. It is therefore considered that the proposed allocation of the site will not materially affect either the setting of the Grade II Registered Park and Garden or the character of the Conservation Area. A prehistoric artefact was reportedly found on the site though the connection with the site has not been determined; it is considered that there is a low to medium potential for further remains to be identified on the site.

**Residential Amenity and Wildlife**

The site is situated on the eastern edge of Wombourne adjacent to residential areas on the north western boundary of the site. The eastern boundary of the site is formed by the A449 and a former petrol filling station, now in use as a car wash business. The site was formerly Gittins Nurseries and had a commercial horticultural use. There are no known records of protected species sightings or sensitive environmental designations on the site.

**Adequacy of Infrastructure and Services**

The site is considered to have relatively good access to shops and services within the village centre. Wombourne is identified as a major service village and offers a good range of services and facilities including a secondary and primary school, GP’s surgeries and a range of retail opportunities.

A contribution may be required towards education provision as a result of the additional housing development occurring on this site.

**Flood Risk**

No known issues. Flood Risk Assessment (FRA) is required with a planning application once allocated. Contact with Severn Trent required regarding foul/sewer connection. No significant concerns were raised by the Lead Local Flood Authority.

**Land Stability and Contamination**

No known issues.

**Proximity to Mineral Operations**
There are no known issues with the site. Staffordshire County Council (the Minerals authority) has been consulted at each stage of the SAD’s preparation and has raised no concerns regarding the site.

Noise and Pollution
No known issues.

Capacity and Site Size
Site 302 comprises an area of land for allocation in the SAD, some 4.1 hectares. The 4.1 hectares of land identified for allocation has sufficient capacity to provide a minimum of 80 dwellings, plus associated roads, open space and SuDs.

Deliverability and Viability
The Council has engaged with site promoters at all stages of the SAD. The site promoters confirm that the site is deliverable and that a Core Strategy policy compliant scheme can be delivered on site. This includes a minimum 80 dwellings, with 40% affordable housing [Policy H2]; on site open space/green infrastructure [SAD7] and other key development requirements set out in policy SAD9.

Consultation with site promoters, residents, statutory bodies and other stakeholders has identified no issues that would impact the viability and deliverability of Site 302. Overall, the vast majority of sites within the District are shown to be deliverable based on the viability study [SD89]. This evidence, combined with the Council’s track record of delivering affordable housing, as set out in Table 10.3 of the Council’s Viability Study [SD89], means the Council can be confident that sites in the plan are deliverable in accordance with the Core Strategy and will be forthcoming, which has been confirmed by the site promoters.

ii. Are the site-specific planning requirements necessary, effective and justified, including, where applicable, pedestrian and vehicular access, landscape, open space, boundary treatment, flood risk, drainage, transport assessment and road/junction improvements, boundary treatment and contributions to education/road improvements?

Council Response
The site assessment process identified a number of issues in relation to site 302 which have informed the site development requirements as identified in the individual site proformas. It is expected that these issues will be addressed in order to ensure the successful delivery of this site. The areas which were identified as requiring particular attention were:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site 302 – Housing</strong></td>
<td></td>
</tr>
<tr>
<td>Vehicular access off Beggars Bush Lane</td>
<td>To provide a suitable and safe site access.</td>
</tr>
<tr>
<td>Road improvement scheme to Beggars Bush Lane to</td>
<td>To secure delivery of the proposed Site without</td>
</tr>
<tr>
<td>be agreed between Staffordshire County</td>
<td>severely impacting the capacity of the local</td>
</tr>
<tr>
<td>Council (Highways) and the site promoters.</td>
<td>road network.</td>
</tr>
<tr>
<td>Pedestrian access to connect to existing</td>
<td>To provide a suitable and safe site access.</td>
</tr>
<tr>
<td>pavement network from</td>
<td></td>
</tr>
</tbody>
</table>

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Matter 4 – Site Specific Matters – Housing, Safeguarded Land, Green Belt & Development Boundaries - WOMBOURNE
Beggars Bush Lane.

| Strong landscape boundaries to be implemented and maintained. | To promote clear site boundaries to and to distinguish the limits of the built development. |
| Sustainable drainage scheme as part of master planning. | Identified as a mitigation measure in Table 3.2 of the SA [SD10]. |
| Connectivity to existing open space and new open space including allotments to be delivered onsite or potentially on adjoining land to the south of Beggars Bush Lane. | To ensure safe, effective pedestrian links to facilities and services, existing built development and local green spaces and play facilities. |

The Council considers that the requirements for Site 302 are necessary to make the development acceptable and to mitigate impacts of development.

**iii. Where the site is being released from the Green Belt for development or Safeguarded Land, have the exceptional circumstances for releasing the site from the Green Belt been fully demonstrated, and would the release of the site prejudice or conflict with the purposes of including the site within the Green Belt?**

**Council Response**

The SAD has been positively prepared, predicated on the principle of plan led growth to deliver the requirements for allocated sites and safeguarded land set out in the adopted Core Strategy. A comprehensive and transparent districtwide assessment of all available and deliverable sites has been carried out [SD079], as set out in the Council’s response to 2.2(d). Therefore, the Green Belt releases proposed in Policies SAD2/SAD3 are consistent with the NPPF and PPG, as they are based on a clear case for exceptional circumstances and have been informed by a Green Belt Review [SD74 – 74a], to ensure that harm to the purposes of the Green Belt is minimised. Furthermore, the Core Strategy is clear at paragraph 6.21 that, ‘In order to deliver the Core Strategy, it is recognised that in a number of Main Service Villages and Local Service Villages it will be necessary to immediately consider land that is currently Greenfield and Green Belt because the opportunities to explore the first three stages in the sequential approach do not exist’.

Site 302 lies in the Green Belt within a parcel of land categorised as making a contribution to the purposes of the Green Belt. (SD074). All the other parcels of land around Wombourne were classified as making a ‘considerable contribution’. The parcel of land within which the site is situated was identified as being relatively modest in size and with limited opportunity for expansion and therefore encroachment into the countryside.

A number of sites within settlement boundary and brownfield site options were assessed and those options considered deliverable have subsequently been granted permission, or proposed as allocations, and their contribution to meeting the housing requirement recognised. The Site Allocations Document is seeking to identify sufficient land to meet the residual housing and safeguarded land requirements for Wombourne.
Therefore, taking account of the requirements of paragraph 6.20 of the adopted Core Strategy; the dwelling requirement for Wombourne and the outcomes of the Green Belt Review, the Council considers that the need to deliver the strategy and housing requirements identified in the Core Strategy and the lack of sequentially preferable development options justify the release of this site from the Green Belt. In promoting this allocation, the Site Allocations Document has sought to identify the option which would produce the least conflict with the purposes of the Green Belt whilst taking to account all other potential relevant issues to arrive at the optimum site selection to meet the identified housing land requirement in this location.
c. **Land north of Bridgnorth Road, Wombourne** (283)  
   (Housing/Green Belt/ Development Boundary)

i. Are the reasons for selecting the site soundly based; has the site assessment process identified and addressed all relevant considerations, including, where applicable, impact on the local road network, environment, landscape, historic environment, heritage assets, residential amenity and wildlife, adequacy of infrastructure/services, flood risk, land stability/contamination, proximity to mineral operations, noise and pollution and capacity/size of the site; and is the site suitable, available, justified, sustainable, developable, deliverable, viable and soundly based?

**Council Response**

The site has been assessed and evaluated in accordance with the Council’s published Methodology and the site selection process considered the potential impact against a range of Tier 1 and Tier 2 criteria which are set out in the Council’s Methodology Paper [SD21]. The site is a sustainable location, situated adjacent to the boundary of the existing settlement edge of a Main Service Village in accordance with the strategy identified in the adopted Core Strategy Policy CP1. It has been considered against the sequential approach to site selection as identified in the para 6.20 of the Core Strategy. A number of sites located within the settlement boundary were identified at the Issues and Options stage. Those sites which were considered to be deliverable have during the process of plan formulation gained the benefit of planning permission and have been taken into account when determining the level of residual site provision required to meet the needs of Wombourne during the plan period. Those remaining deliverable sites within the development boundary which are suitable and available for development are proposed as housing allocations (as set out in [SD07]); however these sites aren’t sufficient to meet the remaining allocation for Wombourne. Therefore greenfield (Green Belt) options are needed to deliver the Core Strategy.

The site was the second best performing greenfield site option in relation to the site assessment process, however a number of potential issues where identified which will merit attention during the drafting of detailed scheme proposals. These issues have informed the requirements identified in SAD9 and the detailed site specific requirements included as Appendix 1 [SD01].

**Local Road Network**

Staffordshire County Council has been engaged throughout preparation of the SAD. They have confirmed that a suitable access can be achieved to the site [SD08]. Throughout plan preparation, Staffordshire County Council has raised no concerns regarding the level of development proposed and its impact on the Local Road Network.

**Environment and Landscape**

The site is identified as comprising predominantly Grade 3 quality agricultural land. Whilst attention is given towards protecting wherever possible the higher grades of agricultural land from development it was recognised in the Council’s SHLAA [SD79] that the presence of such high quality agricultural land is so extensive in certain parts of the district as to severely limit the potential for development. It was therefore determined to seek to protect Grade 1 quality land and direct developers to minimise the loss of the other better quality grades when drafting detailed scheme proposals [Policy SAD9].
The site is located within an area considered to have low landscape sensitivity [SD77] being visually contained and subject to urban influences from the settlement edge.

**Historic Environment and Heritage Assets**
Historic site assessment has been informed by the South Staffordshire Historic Environment Character Assessment [SD096] and confirmed by the South Staffordshire Historic Environment Site Assessment (HESA) [SD097]. The area is dominated by field systems which have been substantially altered into the mid to late 20th century, however some historical field boundaries have survived. The initial historic environment assessment indicated the presence of a Historical Environment Record feature running through the site. The Historic Environment Site Assessment identified the site of a former Roman Road to the east of the site, though it was noted that no other Roman archaeology has been recorded and that consequently there was a low potential for further Roman or medieval remains to be identified on the site.

**Residential Amenity and Wildlife**
The north west boundary of the site adjoins the village boundary and is characterised by existing residential development. The north of the site is adjacent to Sytch Lane Cemetery and the site is bounded to the south west by the South Staffordshire Railway Walk. Strong landscape boundaries will need to be implemented to contain and separate site from the larger land parcel of which it forms a part.

The site is adjacent to a local nature reserve and there is a record of protected wildlife on the site, there is no indication that the proposed development would create any conflicts with the LNR however account should be taken of this designated site in accordance with Core Strategy policies CP2 and EQ1.

**Adequacy of Infrastructure and Services**
The site offers good vehicular and pedestrian links to services and amenities along Common Road. Wombourne is identified as a major service village and offers a good range of services and facilities including a secondary and primary school, GP’s surgeries and a range of retail opportunities. There are established employment sites within walking distance of the site.

A contribution may be required towards education provision as a result of the additional housing development occurring on this site.

**Flood Risk**
No known issues. Flood Risk Assessment (FRA) is required with a planning application once allocated. No significant concerns were raised by the Lead Local Flood Authority.

**Land Stability and Contamination**
No known issues.

**Proximity to Mineral Operations**
There are no known issues with the site. Staffordshire County Council (the Minerals authority) has been consulted at each stage of the SAD’s preparation and has raised no concerns regarding the site.

**Noise and Pollution**
No known issues.
Capacity and Site Size
The housing site measures 3.7 hectares which is considered to be sufficient to meet the identified housing site housing allocation of 80 dwellings and make an on-site open space contribution. It is considered that this represents a proportionate contribution towards meeting the allocated land requirements of the District given the status of Wombourne as a Main Service Village.

Deliverability and Viability
Consultation with site promoters, residents, statutory bodies and other stakeholders has identified no issues that would impact the viability and deliverability of Site 283. Overall, the vast majority of sites within the District are shown to be deliverable based on the viability study [SD89]. This evidence, combined with the Council’s track record of delivering affordable housing, as set out in Table 10.3 of the Council’s Viability Study [SD89], means the Council can be confident that sites in the plan are deliverable in accordance with the Core Strategy and will be forthcoming, which has been confirmed by the site promoters.

ii. Are the site-specific planning requirements necessary, effective and justified, including, where applicable, pedestrian and vehicular access, landscape, open space, boundary treatment, flood risk, drainage, transport assessment and road/junction improvements, boundary treatment and contributions to education/road improvements?

Council Response
The site assessment process identified a number of issues in relation to site 406 which have informed the site development requirements as identified in the individual site proformas. It is expected that these issues will be addressed in order to ensure the successful delivery of this site. The areas which were identified as requiring particular attention were:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site 283 – Housing</td>
<td></td>
</tr>
<tr>
<td>Vehicular access off Bridgnorth Road</td>
<td>To provide a suitable and safe site access.</td>
</tr>
<tr>
<td>Pedestrian access to connect to existing pavement network from Bridgnorth Road</td>
<td>To provide a suitable and safe site access.</td>
</tr>
<tr>
<td>Strong landscape boundaries to be implemented and maintained.</td>
<td>To protect the Green Belt to the east from encroachment and to contain the site within a larger land parcel.</td>
</tr>
<tr>
<td>Sustainable drainage scheme as part of masterplanning</td>
<td>Identified as a mitigation measure in Table 3.2 of the SA [SD10].</td>
</tr>
<tr>
<td>Connectivity to existing open space and new open space to be delivered on-site.</td>
<td>To ensure safe, effective pedestrian links to facilities and services, existing built development and local green spaces and play facilities.</td>
</tr>
<tr>
<td>Links to the South Staffordshire Railway Walk</td>
<td>To improve linkages and increase Recreation opportunities.</td>
</tr>
<tr>
<td>Retain tree boundaries along southern edge and western boundaries of the site.</td>
<td>Support the creation of strong and defensible site boundaries.</td>
</tr>
</tbody>
</table>
The Council considers that the requirements for Site 283 are necessary to make the development acceptable and to mitigate impacts of development.

iii. Where the site is being released from the Green Belt for development or Safeguarded Land, have the exceptional circumstances for releasing the site from the Green Belt been fully demonstrated, and would the release of the site prejudice or conflict with the purposes of including the site within the Green Belt?

Council Response

The SAD has been positively prepared, predicated on the principle of plan led growth to deliver the requirements for allocated sites and safeguarded land set out in the adopted Core Strategy. A comprehensive and transparent districtwide assessment of all available and deliverable sites has been carried out [SD079], as set out in the Council’s response to 2.2(d). Therefore, the Green Belt releases proposed in Policies SAD2/SAD3 are consistent with the NPPF and PPG, as they are based on a clear case for exceptional circumstances and have been informed by a Green Belt Review [SD74 – 74a], to ensure that harm to the purposes of the Green Belt is minimised. Furthermore, the Core Strategy is clear at paragraph 6.21 that, ‘In order to deliver the Core Strategy, it is recognised that in a number of Main Service Villages and Local Service Villages it will be necessary to immediately consider land that is currently Greenfield and Green Belt because the opportunities to explore the first three stages in the sequential approach do not exist’.

Site 283 lies in the Green Belt within a parcel of land categorised as making a considerable contribution to the purposes of the Green Belt. The parcel of land within which the site is situated was identified as making a considerable contribution to the purposes of Green Belt, preventing encroachment into the countryside and the coalescence of Wombourne with neighbouring villages, which justifies the need to implement and maintain strong boundaries. Whilst making a considerable contribution, it was ranked lower than other sites making a considerable contribution.

A number of brownfield and development boundary site options were assessed and those options considered deliverable (i.e. suitable, available and achievable) have subsequently been granted permission or proposed as allocations. The housing requirement for the village was adjusted to take account of these permissions leaving a residual housing requirement and a safeguarded land allocation to be delivered through the Site Allocations Document. Therefore, taking account of the requirements of paragraph 6.20 of the adopted Core Strategy; the dwelling requirement for Wombourne and the outcomes of the Green Belt Review, the Council considers that the need to deliver the strategy and housing requirements identified in the Core Strategy and the lack of sequentially preferable development options justify the release of this site from the Green Belt. In promoting this allocation, the Site Allocations Document has sought to identify the option which would produce the least conflict with the purposes of the Green Belt whilst taking to account all other potential relevant issues to arrive at the optimum site selection to meet the identified housing and safeguarded land requirement in this location.

The sites boundary has been drawn having regard to the villages allocation in Core Strategy Policy CP6 [SD70], and as such, the site currently does not have existing boundaries defining its outer edges along all areas of the site boundary.
In recognition of this, new boundaries will need to be created where necessary to reflect the NPPF requirement to ensure the permanence of Green Belt boundaries. The requirement for the site to provide strong defensible landscape boundaries is set out in Policy SAD9 and Appendix 1 planning requirements.

Therefore, the exceptional circumstances justifying the site’s release and the realignment of the development boundary include the requirements of paragraph 6.20 of the adopted Core Strategy; the dwelling requirement for Wombourne; the outcomes of the Green Belt Review; and the Council’s attempts to fully explore non-Green Belt land supply options within the village.
d. **Land off Orton Lane, Wombourne** (416)
   (Safeguarded Land/Greenbourne)

i. **Are the reasons for selecting the site soundly based; has the site assessment process identified and addressed all relevant considerations, including, where applicable, impact on the local road network, environment, landscape, historic environment, heritage assets, residential amenity and wildlife, adequacy of infrastructure/services, flood risk, land stability/contamination, proximity to mineral operations, noise and pollution and capacity/size of the site; and is the site suitable, available, justified, sustainable, developable, deliverable, viable and soundly based?**

**Council Response**

The site has been assessed and evaluated in accordance with the Council’s published Methodology and the site selection process considered the potential impact against a range of Tier 1 and Tier 2 criteria which are set out in the Council’s Methodology Paper [SD21]. The site is a sustainable location, situated adjacent to the boundary of the existing settlement edge of a Main Service Village in accordance with the strategy identified in the adopted Core Strategy Policy CP1. It has been considered against the sequential approach to site selection as identified in para 6.20 of the Core Strategy. A number of sites located within the settlement boundary were identified at the Issues and Options stage. Those sites which were considered to be deliverable have during the process of plan formulation gained the benefit of planning permission and have been taken into account when determining the level of residual site provision required to meet the needs of Wombourne during the plan period. Those remaining deliverable sites within the development boundary which are suitable and available for development are proposed as housing allocations (as set out in [SD07]); however these sites aren’t sufficient to meet the remaining allocation for Wombourne. Therefore greenfield (Green Belt) options are needed to deliver the Core Strategy.

Two other greenfield site allocations [302 & 283] have been identified to meet the residual housing requirement for the village. In order to meet the National Policy objective of identifying Green Belt boundaries on a timescale beyond the plan period additional sites are required to meet this safeguarded development land requirement. This site has been identified to meet part of this requirement.

The site was the third best performing greenfield site option in relation to the site assessment process however a number of potential issues where identified which will merit attention during the drafting of detailed scheme proposals. These issues have informed the requirements identified in SAD9 and the detailed site specific requirements included as Appendix 1 [SD01].

**Local Road Network**

Staffordshire County Council has been engaged throughout preparation of the SAD. They have confirmed that a suitable access can be achieved to the site [SD08]. Throughout plan preparation, Staffordshire County Council has raised no concerns regarding the level of development proposed and its impact on the Local Road Network.

**Environment and Landscape**

The site is identified as comprising predominantly Grade 2 quality agricultural land. Whilst attention is given towards protecting wherever possible the higher grades of agricultural land from development it was recognised in the Council’s SHLAA [SD79] that the presence of such high quality agricultural land is so
extensive in certain parts of the district as to severely limit the potential for development. It was therefore determined to seek to protect Grade 1 quality land and direct developers to minimise the loss of the other better quality grades when drafting detailed scheme proposals (Policy SAD9).

The land within which the parcel is situated is rated as being of high sensitivity in relation to landscape impact.

**Historic Environment and Heritage Assets**

Historic site assessment has been informed by the South Staffordshire Historic Environment Character Assessment [SD096] and confirmed by the South Staffordshire Historic Environment Site Assessment (HESA) [SD097]. The area is dominated by field systems which have seen substantial alteration in the mid to late 20th century. There are no significant impacts anticipated in relation to the historic environment, site is within close proximity of the abandoned line of the Wolverhampton-Kingswinford railway, no indirect effects on setting however are predicted and the potential for unrecorded assets on-site is considered to be low.

**Residential Amenity and Wildlife**

The site is situated within open countryside at the northern tip of the village. The southern edge of the site adjoins the settlement boundary and is an area characterised by existing residential development. There are no identified issues in relation to residential amenity. The site is within 400 metres of a local nature reserve there is no indication that the proposed development would create any conflicts with the LNR however account should be taken of this designated site in accordance with Core Strategy policies CP2 and EQ1. An area of ancient woodland is in close proximity of the site, National Policy protects such sites from any development proposal which would result in the loss or deterioration of such woodland sites [NPPF para 118].

**Adequacy of Infrastructure and Services**

Services and amenities are accessible from the site though it is situated a further distance relative to other site options. Wombourne is identified as a major service village and offers a good range of services and facilities including a secondary and primary school, GP’s surgeries and a range of retail opportunities.

A contribution may be required towards education provision as a result of the additional housing development occurring on this site.

**Flood Risk**

There is a pond on the site and it is considered that assessment will be required to determine if there is any potential flood risk. A Flood Risk Assessment (FRA) is required with a planning application once allocated.

**Land Stability and Contamination**

No known issues.

**Proximity to Mineral Operations**

There are no known issues with the site. Staffordshire County Council (the Minerals authority) has been consulted at each stage of the SAD’s preparation and has raised no concerns regarding the site.

**Noise and Pollution**

No known issues.

**Capacity and Size of Site**
This safeguarded land site measures 2.8 hectares. It is considered that this along with other areas of safeguarded land situated to the west of Wombourne represents a proportionate contribution towards meeting the safeguarded land requirement of the district given the status of Wombourne as a Main Service Village.

Deliverability and Viability

Overall, the vast majority of sites within the Plan are shown to be deliverable based on the viability study [SD89]. This evidence, combined with the Council’s track record of delivering affordable housing, as set out in Table 10.3 of the Council’s Viability Study [SD89], means the Council considers that there is more than a reasonable prospect that the safeguarded site could be viably delivered at the point envisaged.

ii. Are the site-specific planning requirements necessary, effective and justified, including, where applicable, pedestrian and vehicular access, landscape, open space, boundary treatment, flood risk, drainage, transport assessment and road/junction improvements, boundary treatment and contributions to education/road improvements?

Council Response

The site assessment process identified a number of issues in relation to site 416 which have informed the site development requirements as identified in the individual site proformas. It is expected that these issues will be addressed in order to ensure the successful delivery of this site through the review of the Local Plan. The areas which were identified as requiring particular attention were:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicular access off Orton Lane.</td>
<td>To provide a suitable and safe site access.</td>
</tr>
<tr>
<td>Arboricultural and ecological surveys for the site, and any proposed mitigation arising, should take full account of nearby ancient woodland.</td>
<td>To ensure that any potential harm arising from the development is identified and prevented or mitigated.</td>
</tr>
<tr>
<td>Retain hedgeline along eastern site boundary.</td>
<td>To recognise historic field patterns and assist in minimising the risk of further encroachment into the open countryside.</td>
</tr>
</tbody>
</table>

The Council considers that the requirements for Site 416 are necessary to make the development acceptable and to mitigate impacts of development.

iii. Where the site is being released from the Green Belt for development or Safeguarded Land, have the exceptional circumstances for releasing the site from the Green Belt been fully demonstrated, and would the release of the site prejudice or conflict with the purposes of including the site within the Green Belt?

Council Response

The SAD has been positively prepared, predicated on the principle of plan led growth to deliver the requirements for allocated sites and safeguarded land set out in the adopted Core Strategy. A comprehensive and transparent districtwide assessment of all available and deliverable sites has been carried out [SD079], as set out in the Council’s response to 2.2(d). Therefore, the Green Belt releases...
proposed in Policies SAD2/SAD3 are consistent with the NPPF and PPG, as they are based on a clear case for exceptional circumstances and have been informed by a Green Belt Review [SD74 – 74a], to ensure that harm to the purposes of the Green Belt is minimised. Furthermore, the Core Strategy is clear at paragraph 6.21 that, ‘In order to deliver the Core Strategy, it is recognised that in a number of Main Service Villages and Local Service Villages it will be necessary to immediately consider land that is currently Greenfield and Green Belt because the opportunities to explore the first three stages in the sequential approach do not exist’.

Site 416 lies in the Green Belt within a parcel of land categorised as making a considerable contribution to the purposes of the Green Belt. [SD074]. The extended parcel of land within which the site is situated was identified having few significant boundaries which could protect the countryside from encroachment and resulting in coalescence with Lower Penn to the north. The Green Belt review did however note that the land to the south of the parcel, within which the proposed site is situated, did have significant and constraining boundaries which would prevent encroachment to the east and west. It was suggested that this could make the modest release of Green Belt to the south of the parcel more feasible. This approach has been adopted as this would represent the next best option in terms of minimising harm to Green Belt purposes, notwithstanding that the site is situated within a highly sensitive area of landscape.

A number of brownfield and within settlement site options were assessed and those options considered deliverable (i.e. suitable, available and achievable) have subsequently been granted permission, or proposed as allocations, and their contribution to meeting the housing requirement recognised. The SAD is seeking to identify sufficient land to meet the residual housing and safeguarded land requirements for Wombourne.

Therefore, taking account of the requirements of paragraph 6.20 of the adopted Core Strategy; the need to identify sufficient safeguarded land to deliver 1750 dwellings in accordance with Core Strategy Policy CP6 and the outcomes of the Green Belt Review, the Council considers that the need to deliver the strategy and housing requirements identified in the Core Strategy and the lack of sequentially preferable development options justify the release of this site from the Green Belt. In promoting this allocation, the Site Allocations Document has sought to identify the option which would produce the least conflict with the purposes of the Green Belt whilst taking to account all other potential relevant issues to arrive at the optimum site selection to meet the identified housing and safeguarded land requirement in this location.
e. **Land north of Poolhouse Road, Wombourne** (285/459/415)  
(Safeguarded Land/ Green Belt)

i. Are the reasons for selecting the site soundly based; has the site assessment process identified and addressed all relevant considerations, including, where applicable, impact on the local road network, environment, landscape, historic environment, heritage assets, residential amenity and wildlife, adequacy of infrastructure/services, flood risk, land stability/contamination, proximity to mineral operations, noise and pollution and capacity/size of the site; and is the site suitable, available, justified, sustainable, developable, deliverable, viable and soundly based?

**Council Response**

The sites have been assessed and evaluated in accordance with the Council’s published Methodology and the site selection process considered the potential impact against a range of Tier 1 and Tier 2 criteria which are set out in the Council’s Methodology Paper [SD21]. The combined site is in a sustainable location, situated adjacent to the boundary of the existing settlement edge of a Main Service Village in accordance with the strategy identified in the adopted Core Strategy Policy CP1. It has been considered against the sequential approach to site selection as identified in the para 6.20 of the Core Strategy. A number of sites located within the settlement boundary were identified at the Issues and Options stage. Those sites which were considered to be deliverable have during the process of plan formulation gained the benefit of planning permission and have been taken into account when determining the level of residual site provision required to meet the needs of Wombourne during the plan period. Those remaining deliverable sites within the development boundary which are suitable and available for development are proposed as housing allocations (as set out in [SD07]); however these sites aren’t sufficient to meet the remaining allocation for Wombourne. Therefore greenfield (Green Belt) options are needed to deliver the Core Strategy.

Two other greenfield site allocations [302 & 283] have been identified to meet the residual housing requirement for the village, in order to meet the National Policy objective of identifying Green Belt boundaries on a timescale beyond the plan period additional sites are required to meet this safeguarded development land requirement. This site has been identified to meet part of this requirement.

These sites collectively represented the fourth best performing greenfield site options in relation to the site assessment process however a number of potential issues where identified which will merit attention during the drafting of detailed scheme proposals. These issues have informed the requirements identified in SAD9 and the detailed site specific requirements included as Appendix 1 [SD01].

**Local Road Network**

Access to sites considered acceptable subject to consideration of access location (415), appropriate access arrangements [459], and suitable pedestrian connections for all three sites. Staffordshire County Council has been engaged throughout preparation of the SAD. They have confirmed that a suitable access can be achieved to the site [SD08]. Throughout plan preparation, Staffordshire County Council has raised no concerns regarding the level of development proposed and its impact on the Local Road Network.

**Environment and Landscape**
The site is identified as comprising predominantly Grade 3 quality agricultural land. Whilst attention is given towards protecting wherever possible the higher grades of agricultural land from development it was recognised in the Council’s SHLAA [SD79] that the presence of such high quality agricultural land is so extensive in certain parts of the district as to severely limit the potential for development. It was therefore determined to seek to protect Grade 1 quality land and direct developers to minimise the loss of the other better quality grades when drafting detailed scheme proposals (Policy SAD9).

Landscape sensitivity is classified as low over all of the sites, it is considered that development at this location would represent a logical extension to the settlement and would fit well with the settlement structure.

Historic Environment and Heritage Assets
Historic site assessment has been informed by the South Staffordshire Historic Environment Character Assessment [SD096] and confirmed by the South Staffordshire Historic Environment Site Assessment (HESA) [SD097]. The site is characterised as having developed as a consequence of piecemeal enclosure with some hedgerow boundaries remaining. There are a number of identified heritage assets within 400 metres of these sites including Grade II Listed Buildings and a Canal Conservation Area. The Historic Environment Site Assessment concluded that there was no intervisiblility between the proposed development sites and the assets and that therefore no impacts were considered likely. The presence of a potential medieval water meadow to the west of site 285 was identified and it was considered that the potential for archaeological remains on this site were low to moderate, on sites 449 and 415 the potential for the presence of on-site remains was considered to be low.

Residential Amenity and Wildlife
The sites are situated to the west of Wombourne, the area to the south and east is characterised by residential development. The Smestow Bridge employment area is situated to the west, and an area of employment use is situated between sites 459 and 415. No issues related to residential amenity have been identified. There are no known records of protected species sightings or sensitive environment designations on the site.

Adequacy of Infrastructure and Services
Sites have relatively good access to services and amenities. Wombourne is identified as a major service village and offers a good range of services and facilities including a secondary and primary school, GP’s surgeries and a range of retail and employment opportunities.

A contribution may be required towards education provision as a result of the additional housing development occurring on this site.

Flood Risk
There was some surface water flooding mapped to the north of site 285 and it was indicated that assessment will be required to determine the extent of any flooding risk, similarly on site 459 some mapped surface water was noted and appropriate mitigation suggested should this be required. No significant flood risk was identified on site 415. Contact with Severn Trent required regarding foul/sewer connection.

Land Stability and Contamination
Site 285 has previously been the subject of quarrying and landfill activity and therefore a Stage 1 Assessment is considered necessary to judge any possible
effects, no adverse concerns in terms of land stability or contamination on sites 459 or 415.

**Proximity to Mineral Operations**
There are no known issues with the site. Staffordshire County Council (the Minerals authority) has been consulted at each stage of the SAD’s preparation and has raised no concerns regarding the site.

**Noise and Pollution**
No known issues.

**Capacity and Site Size**
The safeguarded land combined sites measure 11.3 hectares. It is considered that this represents a proportionate contribution towards meeting the safeguarded land requirements of the District given the status of Wombourne as a Main Service Village.

**Deliverability and Viability**
Overall, the vast majority of sites within the District are shown to be deliverable based on the viability study [SD89]. This evidence, combined with the Council’s track record of delivering affordable housing, as set out in Table 10.3 of the Council’s Viability Study [SD89], means the Council considers that there is more than a reasonable prospect that the safeguarded site could be viably delivered at the point envisaged.

**ii. Are the site-specific planning requirements necessary, effective and justified, including, where applicable, pedestrian and vehicular access, landscape, open space, boundary treatment, flood risk, drainage, transport assessment and road/junction improvements, boundary treatment and contributions to education/road improvements?**

**Council Response**

The site assessment process identified a number of issues which have informed the site development requirements as identified in the individual site proformas. It is expected that these issues will be addressed in order to ensure the successful delivery of this site through a review of the Local Plan. The areas which were identified as requiring particular attention were:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sites 285/415/459 – Housing</strong></td>
<td></td>
</tr>
<tr>
<td>Vehicular access off Pool House Road</td>
<td>To provide a suitable and safe site access.</td>
</tr>
<tr>
<td>Retain at least a proportion of the hedge and tree lines along the boundaries of Site 285 and Site 459.</td>
<td>To provide natural site boundaries.</td>
</tr>
</tbody>
</table>

The Council considers that the requirements for Sites 285/415/459 are necessary to make the development acceptable and to mitigate impacts of development.

**iii. Where the site is being released from the Green Belt for development or Safeguarded Land, have the exceptional circumstances for releasing**
the site from the Green Belt been fully demonstrated, and would the release of the site prejudice or conflict with the purposes of including the site within the Green Belt?

Council Response

The SAD has been positively prepared, predicated on the principle of plan led growth to deliver the requirements for allocated sites and safeguarded land set out in the adopted Core Strategy. A comprehensive and transparent districtwide assessment of all available and deliverable sites has been carried out [SD079], as set out in the Council’s response to 2.2(d). Therefore, the Green Belt releases proposed in Policies SAD2/SAD3 are consistent with the NPPF and PPG, as they are based on a clear case for exceptional circumstances and have been informed by a Green Belt Review [SD74 – 74a], to ensure that harm to the purposes of the Green Belt is minimised. Furthermore, the Core Strategy is clear at paragraph 6.21 that, 'In order to deliver the Core Strategy, it is recognised that in a number of Main Service Villages and Local Service Villages it will be necessary to immediately consider land that is currently Greenfield and Green Belt because the opportunities to explore the first three stages in the sequential approach do not exist’.

The sites lies in the Green Belt within a parcel of land categorised as making a considerable contribution to the purposes of the Green Belt. [SD074]. The extended parcel of land within which the sites are situated was identified as being very open with exceptional views to the west, north and south.

A number of brownfield and within settlement site options were assessed and those options considered deliverable (i.e. suitable, available and achievable) have subsequently been granted permission or proposed as allocations. The housing requirement for the village was adjusted to take account of these permissions leaving a residual housing requirement and a safeguarded land allocation to be delivered through the Site Allocations Document.

Therefore, taking account of the requirements of paragraph 6.20 of the adopted Core Strategy; the need to identify sufficient safeguarded land to deliver 1750 dwellings in accordance with Core Strategy Policy CP6 and the outcomes of the Green Belt Review, the Council considers that the need to deliver the strategy and housing requirements identified in the Core Strategy and the lack of sequentially preferable development options justify the release of this site from the Green Belt. In promoting this allocation, the Site Allocations Document has sought to identify the option which would produce the least conflict with the purposes of the Green Belt whilst taking to account all other potential relevant issues to arrive at the optimum site selection to meet the identified housing and safeguarded land requirement in this location.