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8<sup>th</sup> September 2017

Dudley Council  
Council House  
Priory Road  
Dudley  
DY1 1HL

Sent via email to: [blackcountrycorestrategy@dudley.gov.uk](mailto:blackcountrycorestrategy@dudley.gov.uk)

Dear Sir/Madam

**Call for Sites Consultation - Land at High Hill, Essington**

Pegasus Group is instructed on behalf of Richborough Estates to make submissions in relation to the current Black Country Core Strategy 'Call for Sites' exercise. Richborough Estates has secured an interest on a parcel of land referred to as Land at High Hill, Essington, within the District of South Staffordshire, but with a southern boundary contiguous with the Black Country administrative boundary (Wolverhampton City). This letter provides information about the site in terms of its context, suitability and deliverability.

I attach with this letter a red line plan outlining the site location as well as a completed 'Call for Sites' form.

**Background**

The four Black Country Authorities (Dudley, Sandwell, Walsall and Wolverhampton) are inviting land owners, developers and other bodies to put forward sites to be considered for development as part of the Black Country Core Strategy Review.

Richborough Estates submit that Land at High Hill constitutes a sustainable and deliverable site, which will serve to contribute towards meeting housing needs arising within the Black Country.

It is submitted that the site has the capacity to deliver approximately 140-150 dwellings, subject to its release from the Green Belt.

**Site Description**

The site comprises three parcels of land at High Hill, Essington, totalling approximately 5.9 hectares. The land is currently in agricultural use and is currently accessed from High Hill to the south.

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The parcels of land are subdivided by existing tree/hedgerow boundaries associated with the agricultural use of the land. The site is identified as undifferentiated Grade 3 quality agricultural land on the Provisional ALC map, however these maps aren't suitable for establishing the quality of individual sites. Further survey work can be undertaken as necessary in due course.

The site is located within the West Midlands Green Belt. As such, development of the site would be subject to its release from the Green Belt. The site is located in Flood Zone 1, the area at least risk from flooding. The site is also flat and not constrained topographically.

### **Planning Policy Context**

The four Black Country authorities (Dudley MBC, Sandwell MBC, Walsall Council and City of Wolverhampton Council) collectively produced the existing Black Country Core Strategy, covering the period 2006 to 2026. The existing Core Strategy was adopted in 2011 and includes strategic policies for the Black Country area, whilst various Site Allocation Documents and Area Action Plans have been produced by the individual authorities.

The Black Country Authorities are in the process of undertaking a formal review of the Core Strategy, in light of the identified unmet housing need from within the Greater Birmingham Housing Market Area, of which it forms part. The Strategy is being reviewed to cover the period up to 2036 and is anticipated to be adopted in Autumn 2021. The Review is currently at Issues and Options Stage, which runs to 8<sup>th</sup> September 2017.

Despite its functional relationship with the Black Country conurbation, Land at High Hill falls within the administrative boundary of South Staffordshire District. The adopted Local Plan for South Staffordshire comprises the Core Strategy (2010-2026) adopted December 2012. The Council are also progressing a Site Allocations Document, which is due to be submitted to the Secretary of State for examination in 'late summer' 2017. Land at High Hill was considered as part of the Site Allocations Document and is included within the 'Discounted Sites' paper. The site was discounted as it is the village of Essington was considered to have already met its development requirements as part of the spatial strategy. However, it is submitted that the site is appropriate for development in terms of its ability to meet housing needs arising within the Black Country Authorities, rather than within South Staffordshire, as set out below.

The Site will be promoted through both the Black Country Core Strategy Review and the forthcoming South Staffordshire Local Plan Review. Initial informal discussions have taken place with planning officers at South Staffordshire District Council.

### **Sustainability**

The site is sustainably located immediately adjacent to the major built up area of Wolverhampton. In terms of services, St John's Primary Academy, Essington, is located approximately 800m to the north-west of the site.

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A local shopping parade exists on Higgs Road, some 450m to the south of the site, inclusive of a One-stop convenience store, a takeaway and a hairdresser. The site is therefore sustainably located in terms of access to local facilities and services.

In terms of public transport, the number 71 bus service runs along High Hill to the south of the site connecting Wolverhampton and Cannock. This service begins at approximately 7:30 and end at 18:00 in both directions, running at hourly intervals throughout the day. Regarding rail services, the site is located approximately 2.5km away from Bloxwich North Station, with services running between Birmingham, Rugeley and Walsall at approximately hourly intervals.

The site therefore benefits from significant and genuine opportunities to utilise transport modes other than the private car.

### **Development Constraints**

The site is located in Flood Zone 1, the area at least risk from flooding.

A scheduled monument (referred to as 'Moat House and Moated Site') is located approximately 900m to the west of the site, beyond the village of Essington.

Sneyd Local Nature Reserve (also known as Rough Wood Chase LNR) is located approximately 1.5km to the east of the site, beyond the M6 motorway.

If required further technical information will be undertaken to help inform the plan-making process.

None of the constraints identified to-date would preclude the development of the site.

### **Demonstrating Deliverability**

Footnote 11 to Paragraph 47 of the NPPF states that in order to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. The paragraphs below demonstrate how the site is suitable, available and achievable to accommodate residential development.

#### *Availability:*

Richborough Estates has an agreement with the landowner who have demonstrated, through the submission of this site through the Call for Sites consultation, that they are supportive of the development of the site to deliver much needed new homes.

As such, this call for sites submission confirms that there is nothing to prevent this site from being delivered immediately upon its removal from the Green Belt and the receipt of the necessary consents. The site can therefore be considered to be available.

*Suitability:*

Despite its location in South Staffordshire District, the site is geographically located immediately adjacent to the Wolverhampton conurbation. The site benefits from a sustainable location and is therefore well placed to meet the current and future development needs of the Black Country area.

As identified above, the site is well served by public transport and a number of local services and facilities are within a short walking distance or short public transport journey from the site. The site would therefore be well placed to ensure that future residents would have excellent sustainable access to a diverse range of services and facilities, representing an opportunity to deliver a cohesive, sustainable community that acts as a natural urban extension to Wolverhampton and the wider Black Country.

The site is located within an area bordered by residential land use to the north, west and south. Whilst the site is located in the Green Belt, its development would serve to 'round off' the village of Essington, and would not cause the village to merge with the Wolverhampton conurbation. Given the above it is respectfully suggested that the site be considered to be suitable for development.

*Achievability:*

The site is located within Flood Zone 1, the area at lowest risk from flooding. A scheduled monument is located approximately 900m to the west of the site. The presence of this monument would be carefully considered when drawing up proposals for the site. Similarly, Sneyd Local Nature Reserve is located approximately 1.5km to the east of the site. However, the presence of both of these features does not preclude development, particularly when the latter is located beyond the M6 motorway.

It is not known at this stage whether any of the trees surrounding the site are subject to a tree preservation order, however, the site is not located within a conservation area. There are no other known environmental or historical designations which affect the site.

In terms of access, new accesses would be required from Brownshore Lane to the north, subject to detailed highways assessments.

The site is therefore not subject to any major physical constraints which would prevent development from being achieved.

**Green Belt**

As noted above, the site is located within the Green Belt. It is understood that a Green Belt Review is being progressed at the Greater Birmingham Housing Market Area level in conjunction with the Black Country Core Strategy Review.

A brief assessment of the site against the five purposes of the Green Belt as set out within NPPF is included below.

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### *Checking the Unrestricted Sprawl of Large Built-Up Areas*

Whilst it can be argued that the development of the site would result in the sprawl of the built area of Wolverhampton/Essington, the same can be said for any site released from the Green Belt for residential development. It remains that there is an overwhelming housing need within the GBHMA which can only be met through Green Belt release adjacent to the existing conurbation.

### *Preventing Neighbouring Towns Merging into One Another*

The existing edge of the Wolverhampton conurbation is located approximately 230m to the south of the village of Essington. Given the shape of the site and prevailing line of built conurbation of Wolverhampton, the development of the site will not significantly erode this distance. As such, the development of the site would not diminish the existing separation distance between the Black Country conurbation and Essington. A Green Belt buffer beyond the site would remain to the west to prevent merging of Essington with the urban area.

### *Assisting in Safeguarding the Countryside from Encroachment*

Similarly, whilst it can be argued that the development of the site would result in encroachment into the countryside, the same can be said for all sites located within the Green Belt. It remains that the surrounding land uses are predominantly residential and therefore the release of the site would not result in significant encroachment into the countryside, particularly given that the M6 motorway runs along the northern boundary of the site.

### *Preserving the Setting and Special Character of Historic Towns*

The site is not located in a conservation area and there are no listed structures in the vicinity of the site. It is therefore the view of Richborough Estates that Essington does not constitute an 'historic town'. As such, the release of this site from the Green Belt will not impact upon the setting and special character of historic towns.

### *Assisting in Urban Regeneration by Encouraging the Recycling of Derelict and Other Urban Land*

It is recognised through the Core Strategy Review that there is a deficiency of suitable brownfield sites to accommodate the prevailing housing need. As such, the release of this site from the Green Belt would not prejudice the recycling and redevelopment of urban land.

## **Conclusion**

To conclude, Land at High Hill is a greenfield site located in a highly sustainable location adjacent to the existing settlement of Wolverhampton. Whilst the site is located within South Staffordshire District, it has the potential to contribute towards meeting the prevailing housing need arising from within the Black Country and the wider Greater

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Birmingham Housing Market Area. It has been demonstrated that the site is available, suitable and deliverable, subject to its release from the Green Belt.

If you have any queries regarding the site or attached information, please do not hesitate to contact me. Additionally, if any further information is necessary or could be submitted to provide more detail of the proposals for this site or to assist in its assessment then again please do not hesitate to contact me.

Yours sincerely

[Redacted signature]

[Redacted]  
Director

[Redacted]

Enc.