

Black Country Core Strategy
Issues and Options Report
Representations on behalf of Barratt
Homes and David Wilson Homes

September 2017

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1. Introduction

- 1.1 These representations are made on behalf of Barratt Homes and David Wilson Homes (hereafter referred to as 'BDW'), who are promoting land at Pennwood, Wolverhampton ('the site').
- 1.2 BDW is the nation's largest housebuilder with a focus on acquiring land, obtaining planning permission and building the highest quality homes in places people aspire to live. BDW's geographical reach and maximisation of development opportunities across the West Midlands is supported by experts in land, design, and construction. BDW contributed to the delivery of 17,319 new homes in 2016 across the U.K. in the private and affordable housing sectors. In the Black Country, BDW has delivered 5,792 homes over the past 12 years.
- 1.3 The site is located within the administrative area of Wolverhampton City Council and South Staffordshire District Council. Wolverhampton City Council forms one of the four authorities (along with Dudley, Sandwell and Walsall) whom make up the Black Country Core Strategy ('BCCS') Plan area. The BCCS was adopted in February 2011 and covered the period 2006 to 2026. The BCCS is now being reviewed to ensure its spatial objectives and strategy are being effectively delivered, and it remains up to date. Coupled with this are the Black Country's ambitions for significant residential growth.
- 1.4 Pennwood presents the opportunity to create a new sustainable development delivering a range of new homes designed to the highest design quality standards to suit local needs. It is uniquely positioned on the edge of Wolverhampton and benefits from good pedestrian connections to local services and facilities. The creation of significant public open space with new landscaping and sustainable drainage features will provide a new community space with recreation facilities as well as providing ecological enhancement to the local environment.
- 1.5 BDW welcome the opportunity to provide comments on the BCCS Review Issues and Options Report (the 'I&O Report'). These representations are supported by the following:
 - Site Location Plan (**Appendix 1**)
 - Call for Sites Form (**Appendix 2**)
 - Vision Document (**Appendix 3**)

2. Response to Questions

Q1. Do you agree that the Core Strategy review should be a partial review, retaining and stretching the existing spatial strategy and updating existing policies? If not, what do you think should be the scope of the review?

- 2.1 Paragraph 151 of the National Planning Policy Framework ('NPPF') establishes that Local Plans should be consistent with the principles and policies set out in the NPPF. The adopted BCCS was published in 2011, prior to the publication of the NPPF in March 2012. It is based on the housing needs identified by the now revoked West Midlands Regional Spatial Strategy ('WMRSS') and the subsequent WMRSS Phase II Review Panel Report. The Solihull MBC v Gallagher Homes Limited and Lioncourt Homes Limited Judgment [2014] EWHC 1283 (Admin) was clear that the NPPF affected radical change in plan making.
- 2.2 The Housing White Paper (published in February 2017) establishes a national need for a minimum of between **225,000 to 275,000 new homes per year** to keep up with population growth and to start addressing decades of under-supply in housing delivery.
- 2.3 The West Midlands Combined Authority Strategic Economic Plan ('WMCA SEP') (June 2016) recognises the importance of planning to meet these ambitious levels of growth. Indeed, housing is one of the Plan's eight priority actions. Clearly the BCCS Review needs to provide a robust strategy to meet the significant growth across the Black Country, reflecting the priority actions set out in the WMCA SEP.
- 2.4 The adopted BCCS did not release any Green Belt land for development. In stark contrast, the emerging BCCS proposes the release of Green Belt land to deliver a minimum of 14,270 dwellings in order to meet the Black Country's needs. This represents a significant departure from the approach of the adopted BCCS.
- 2.5 To date the BCCS has failed to meet the Black Country's needs since 2006. As at 31 March 2016 there is a shortfall of 3,039 dwellings against the stepped housing delivery trajectory. In Wolverhampton alone there is a shortfall of 1,396 dwellings. Across the area there is a shortfall in employment land of 57 ha and a shortfall in office space in strategic locations of 191,756 sqm.
- 2.6 Therefore a full review of the BCCS is essential to ensure:
- The plan is up to date and is prepared in the current planning context, and reflects the area's current needs (as opposed to those identified in the now revoked WMRSS).
 - All policies and objectives of the emerging BCCS Review are consistent with national planning policy.
 - It comprises a strategy which will deliver against the Black Country's identified needs, and one that is effective, and measurably so, when compared to the shortcoming of the adopted BCCS.
- 2.7 We discuss the need for a full review further in response to Q7, Q9 and Q21.

Q2. Do you think that the key evidence set out at Table 1 is sufficient to support the key stages of the Core Strategy review? If not, what further evidence is required and, if there are any particular issues that should be taken into account in considering development on any particular sites or in any particular areas?

- 2.8 The evidence base currently comprises employment studies that assess strategic sites, high quality employment land and regional logistics sites. Additional employment evidence is necessary to assess the entire supply of employment land across the Black Country, including the value, demand and characteristics of the existing supply. This will be crucial to informing whether it is feasible to release employment land to deliver approx. 10,400 new homes (Strategic Option 1B which is discussed further at Q11a).
- 2.9 If any existing sites are to be proposed for allocation as residential development the evidence base should demonstrate the suitability of the land. This includes consideration of contamination issues, whether the land is a suitably attractive location for residential development, and whether existing neighbouring uses would provide an issue for future residents.
- 2.10 A number of infrastructure studies (including flood risk / water, waste, and viability) are to be undertaken to inform the BCCS Review Preferred Options Paper. Infrastructure viability will be a key factor in determining the deliverability of sites to meet the area's housing needs. To provide a robust assessment of infrastructure public consultation should be undertaken. This will ensure that a full picture regarding infrastructure viability is provided, as residents / landowners will have information which the Black Country authorities' assessment work may not be aware of.
- 2.11 These studies should also not just assess infrastructure within the Black Country exclusively, but also the infrastructure required outside of the area which may be required to meet its needs. For instance, some residents from within the Black Country attend schools in other authority areas, such as Birmingham and South Staffordshire. Cross boundary working with other authorities will be crucial in this respect.
- 2.12 It is also considered that the Black Country authorities include a robust landscape character assessment in the scoping of the evidence base document *Strategic Mapping of the Black Country's Natural Environment*. BDW expect that an updated landscape character assessment will engage with stakeholders involved in landscape assessment and captures changes to the aesthetic, perceptual and experiential qualities of the landscape, particularly at Pennwood, where the site adjoins new residential built form and includes an operational solar farm.

Q3. Do you agree that the housing need identified for the Black Country over the period 2014-36 in the SHMA, and the anticipated amount of supply, are appropriate and in line with national guidance?

- 2.13 We recognise that the Black Country authorities and South Staffordshire have sought to update their evidence base with regards to the future need for housing in the area, with the SHMA published in March 2017. This is presented as complying with the current Planning Practice Guidance (PPG).
- 2.14 The I&O Report cites the SHMA in seeking to meet the objectively assessed need (OAN) for 78,190 homes over the period 2014 to 2036 – equating to 3,554 dwellings per

annum – and confirms that this figure will be used as the basis for deriving the BCCS Review housing target. It is noted, however, that the SHMA and therefore the OAN may be updated in the context of new projections and guidance. This potential for the OAN to change is recognised and considered in the context of the current evidence and guidance below as well as factors which may affect this going forward.

- 2.15 The OAN for the Black Country in the SHMA is based on the following conclusions for each of the prescribed methodological steps set out in the PPG:
- The 'starting point' is correctly identified as the 2014-based sub-national household projections (SNHP) which indicate a projected need for 75,502 dwellings for the period 2014 to 2036. This equates to circa 3,432 dwellings per annum;
 - No further demographic adjustments are concluded as appropriate following consideration of the factors which have historically shaped migration or household formation rates. It is concluded that there is no evidence of younger household suppression due to worsening affordability or undersupply of housing, or evidence of longer-term or more recent levels of population growth which suggest a higher or lower level of projected need;
 - No adjustment is considered necessary to support baseline (or policy-on) forecast employment growth, implying that the growth in labour force associated with the demographic projection is sufficient to accommodate future economic growth;
 - No adjustment to the demographic projection is considered appropriate in response to evidence of worsening market signals between housing supply and demand; and
 - The concluded OAN also seeks to resolve a shortfall in housing provision in the Black Country between 2011 in 2014, in order to maintain consistency with evidence prepared across the Greater Birmingham Housing Market Area (HMA). This does not suggest any accommodation of unmet needs, but simply addresses a recognised deficiency in supply over this historic period. This represents an addition of 2,603 dwellings in the Black Country to the 2014-based SNHP, translating into the concluded OAN of 78,105 dwellings over the plan period, or 3,550 dwellings per annum.
- 2.16 In essence, this means that the OAN for the Black Country is simply based upon a translation of the household growth in the latest 2014-based DCLG projections into dwellings by allowing for vacancy, with no subsequent adjustments made against each of the PPG's methodological steps. In considering the robustness of the conclusion for each of the steps above, we have a number of concerns that lead us to conclude that the OAN arrived at within the SHMA underestimates the full need for housing in the Black Country authorities. The planned level of provision proposed within the I&O Report is therefore considered to not be appropriate, requiring consideration of a higher level of housing provision to ensure that needs are met in full while retaining a level of flexibility.
- 2.17 We have outlined our main areas of concern relating to the OAN below.

Demographic Adjustments

- 2.18 The PPG highlights the importance of sensitivity testing the demographic trend-based assumptions which underpin the 'starting point' of the official 2014-based projections¹. As set out above, the SHMA applies no demographic adjustment in this regard, retaining the level of population and household growth implied by the 2014-based projections despite alternative longer term trend-based projections presented in the SHMA indicating a higher level of housing need in the Black Country over the plan period.
- 2.19 Since the publication of the 2014-based projections, the Office for National Statistics (ONS) has continued to estimate the population of local authorities in England. The latest 2016 mid-year population estimates – which were not available when the SHMA was produced – indicate that the population of the Black Country has increased by circa 16,000 persons since 2014. This represents a level of population growth which is some 27% higher than projected over the same period by the latest 2014-based projections, which anticipated population growth of around 12,600 within this geography. This has resulted from higher levels of net international migration and a significantly smaller net outflow of residents to other parts of the UK, suggesting greater success in retaining those assumed to have moved elsewhere.
- 2.20 Importantly, this indicates that official projections have underestimated population growth to date, which if sustained could underestimate the future need for housing in the Black Country. It is considered important to ensure that the latest available demographic evidence is taken into account in planning to meet housing needs in the Black Country, particularly given the SHMA's retention of the 'starting point' projection without adjustment as its concluded OAN.

The Relationship with Employment Growth

- 2.21 The SHMA considers the relationship between future employment growth and the changing size of the projected labour-force. The conclusion is reached that the concluded OAN can accommodate forecast employment growth. This takes account of the upward adjustment to South Staffordshire's demographic need, which is applied on the basis of a market signals uplift.
- 2.22 There is a notable concern, however, that the approach adopted in considering the relationship between jobs and housing need risks failing to adequately support future job growth. The SHMA confirms that the analysis has directly extracted the demographic outputs of the economic forecasting houses' models, without subjecting the assumptions applied in "flexing" future labour-force behaviour changes to any sensitivity testing.
- 2.23 The limitations of this approach were recently recognised by the Inspector examining the Telford and Wrekin Local Plan. Direct reference was made in the uplifting of the housing requirement in the Draft Plan through the Inspector's proposed main modifications to a recent appeal decision allowing a housing development at Kestrel Close in Newport². Within this appeal decision, the Inspector raised concern with the approach adopted in the SHMA, preferring the appellant's transparent presentation of a '*series of cumulative numerical steps*' which explain the impact of different adjustments to labour-force behaviour. The SHMA does not include sufficient information to ensure

¹ PPG Reference ID 2a-017-20140306

² Council's Formal response to the Inspector's interim note F10 of 30 March 2017, EiP Library Ref: F10b

confidence in the reasonableness of the adjustments applied, thereby posing a risk that the pressures on housing need would be higher than estimated in order to support even a baseline level of growth.

- 2.24 Outside of this baseline employment growth, it is also important to reference with regards to the appropriateness of the future housing requirement that at a sub-regional level there is an ambition to deliver a level of employment growth which exceeds a 'baseline' position. The West Midlands Combined Authority (WMCA) recently published a Strategic Economic Plan (SEP) based on an 'Economy Plus' scenario that aims to create 504,000 additional jobs and secure gross value added (GVA) which is 5% higher than the national average by 2030. Importantly, the SEP also calls for a level of housebuilding significantly greater than currently provided in development plans or being delivered across housing market areas in the West Midlands.
- 2.25 The Government has confirmed its commitment to rebalancing economic growth across the country in developing its modern industrial strategy³. This requires the realisation of the WMCA's objectives, and indeed the importance of both the Northern Powerhouse and Midlands Engine initiatives in delivering '*more balanced growth*' is recognised. This is further articulated within the Midlands Engine Strategy⁴ published in March 2017, which signals new funding of £55 million to support local growth in the Black Country – the second highest level of funding of Local Enterprise Partnerships (LEPs) in the region.
- 2.26 It is noted that the I&O Report recognises the importance of supporting the resurgent economy, with the Economic Development Needs Assessment (EDNA) highlighting the impact of the economic growth ambitions of the Black Country SEP in its concluded employment land requirement.
- 2.27 The SHMA considers the implications of a 'policy-on' level of economic growth within Appendix B. It indicates that under the SEP scenario the Black Country (excluding South Staffordshire) would see an additional 80,000 jobs. The SHMA concludes that no additional housing would be required to support this significant additional growth in employment. The SHMA identifies that this may well appear '*counter-intuitive*' and indeed the level of detail presented in the appendix fails to provide robust justification that this significant additional employment growth would not generate further housing pressures, noting that this almost doubles the level of job growth forecast under the baseline Experian forecasts referenced in the SHMA. In the case of the latter, it is noted that these are predicated on a level of population and housing growth which are closely aligned with the OAN.
- 2.28 It is understood that the Greater Birmingham HMA authorities have commissioned a fourth stage report which builds on the three preceding stages of work examining OAN and the distribution of unmet needs. The '*Strategic Growth Study*' is due to be completed in Winter 2017, and it is understood that its scope of works includes analysis of the scale of housing need associated with supporting the SEP target of 504,000 new jobs as a 'policy-on' scenario. The implications of this work and its alignment with the

³ Department for Business, Energy and Industrial Strategy (2017) Building our Industrial Strategy

⁴ HM Government (March 2017) Midlands Engine Strategy

conclusions of the SHMA in this regard will form an important consideration for the BCCS Review to ensure that it supports the wider agreed economic objectives.

Responding to Worsening Market Signals

- 2.29 As set out above, for the four Black Country authorities the SHMA concludes that no uplift to respond to worsening market signals is justified. This sits in contrast to the application of a 25% adjustment to South Staffordshire within the SHMA. It is recognised that the Black Country authorities remain comparatively affordable when set in a national context. However, the conclusion that no adjustment is required is not considered to be adequately justified, particularly when set in the context of the conclusion to apply no adjustments relating to any of the other methodological stages.

Future Changes to the Guidance for Calculating OAN

- 2.30 As the I&O Report alludes, it is recognised that the Government intends to consult on a new standardised approach to the calculation of OAN. It is understood that this consultation is scheduled for September 2017 and, according to correspondence from DCLG (dated 31st July 2017), any Plans which have not been submitted by March 2018 (as will be the case for the BCCS Review) will be required to apply the new standardised methodology. The SHMA's OAN has evidently been calculated based upon the existing PPG, and the implications of the new methodology will therefore need to be taken into account in the future development of the BCCS Review.
- 2.31 In the context of supporting the economic objectives of the area, it is of note that the Housing White Paper confirms in its commitment to adopting a more standardised approach to calculating housing need the importance of ensuring its consistency with the Modern Industrial Strategy. This will therefore form an important context for the development of subsequent iterations of the BCCS Review⁵.
- 2.32 We reserve the right to comment further on the OAN where the standardised methodology has been published, and used to calculate the Black Country's needs.

Q5. Do you agree with the proposed approach to the Black Country Green Belt Review? If not, what additional work do you think is necessary?

- 2.33 We discuss the strategy to meeting housing needs in the Green Belt in response to Q12a and Q13a.
- 2.34 The Green Belt Review should be a robust assessment, undertaken in accordance with national planning practice guidance and the NPPF, specifically taking account of the need to promote sustainable patterns of development and not including land that does not serve the five purposes of the Green Belt.
- 2.35 As part of this the methodology for the Green Belt Review should be published for consultation prior to work commencing. This will be important to ensure the Review is robust and has the support of the development industry.
- 2.36 The I&O Report indicates the GBHMA Strategic Growth Study (renamed the 'Strategic Locations Study') will "inform and provide the basis" for the Black Country Green Belt Review.

⁵ 'Housing White Paper – Fixing our broken housing market', DCLG, February 2017, Paragraph 1.12

- 2.37 The methodology for the Strategic Locations Study, made available in July 2017, is very broad; referring to the Green Belt will be assessed in 'five sections'. If the study is too broad, and the strategic areas identified too general, it will not form a sound basis for the Black Country Green Belt Review to conclude which land is suitable for Green Belt release. There may be opportunities within discounted areas for smaller parcels of land to be released as sustainable extensions to existing settlements.

Q6. Do you agree that the key issues set out in Part 3 are the key issues that need to be taken into account through the Core Strategy Review? If not, what other key issues should be taken into account?

- 2.38 The nine key issues identified at Part 3 of the I&O Report represent the matters which will be integral to the BCCS Review achieving its ambitious plans for growth.
- 2.39 Mindful of the ambitious levels of growth proposed for the Black Country, the three key issues relating to housing needs, and reviewing the Green Belt, are the most important to take account through the BCCS Review.
- 2.40 The need to review the role and extent of the Green Belt in order to meet the housing needs of the area should be seen as a critical thread throughout the BCCS Review, reflecting issues specific to the Black Country. The key to unlocking this significant level of growth will be providing sufficient infrastructure (including highways, education and recreation).

Q7. Do you think that the Core Strategy vision and sustainability principles remain appropriate? If not, what alternatives would you suggest?

- 2.41 In Q1 we make the case for a full review of the BCCS. This would also necessitate a review of the vision and sustainability principles underpinning the Plan. This is particularly relevant as to date the current vision has not delivered the necessary housing growth required by the BCCS.
- 2.42 The adopted BCCS vision and sustainability principles reflect the area's need at that time (i.e. February 2011). Since then the NPPF has been published and the WMRSS revoked. A new vision is therefore necessary to reflect the area's needs now, which are much higher than at the time the BCCS was adopted, which is demonstrated by the admission that Green Belt land will be necessary. In contrast, no Green Belt was released by the adopted BCCS (indeed the boundaries have not been altered for over 30 years).
- 2.43 Furthermore, the adopted BCCS' vision is underpinned by three 'major directions of change', none of which specifically refer to meeting the Black Country's housing needs. The BCCS Review vision would be more robust if it was underpinned by the nine key issues set out at Part 3 of the I&O Report and made direct reference to the supply of new homes.

Q8. Do you think that the Core Strategy spatial objectives remain appropriate? If not, what alternatives would you suggest and how might these changes impact on individual Core Strategy policies?

- 2.44 Similarly to the BCCS' vision and sustainability principles, the spatial objectives must be reviewed to ensure they are up to date. The BCCS Review will be produced in a

completely different national, regional and local planning context to that of the adopted BCCS. In particular the existing objectives will not form a sound basis to deliver the anticipated levels of growth of the Black Country, let alone the current levels proposed by the BCCS.

- 2.45 Meeting the emerging housing needs will underpin the BCCS Review. It is therefore imperative that these needs are reflected in the objectives, which will be used to measure the success of the Plan. The objectives must also be more robust than those of the current BCCS if they are to be meaningful.

Q9. Do you agree that Policies CSP1 and CSP2 should be retained and updated to reflect new evidence and growth proposals outside the Growth Network? If not, what changes do you think should be made to Policies CSP1 and CSP2 in response to new challenges and opportunities?

- 2.46 We set out in response to Q1 that a full review of the BCCS is necessary given the change in the planning policy, namely the publication of the NPPF and the revocation of the WMRSS. Policies CSP1 and CSP2 therefore need to be reviewed and updated. This is particularly relevant given neither policy reflects that a proportion of the Black Country's growth needs cannot be met within the urban area (which is explicitly acknowledged at paragraph 3.17 of the I&O Report), necessitating the release of land from the Green Belt.

Q11a. Do you support Strategic Option 1A? Yes / No; If yes, please explain why. If no, do you support Option 1B? Yes / No; If yes, please explain why. If you support the release of further employment land for housing, what should the characteristics of these employment areas be?

- 2.47 At the current time there is an established need for the Black Country Authorities to accommodate 81,190 new homes and up to 300 ha of new employment land between 2014 and 2036. It is clear that both are pressing needs which will require significant land.
- 2.48 There is currently a deficit of 57 ha of gross employment space across the Black Country. The monitoring data at Appendix C of the I&O Report identifies that there is a surplus in low quality employment land (146 ha), but a deficit of 218 ha in high quality employment land. This does not distinguish between different types of employment, including different use classes and size.
- 2.49 The Black Country's employment land is characterised by its supply of smaller industrial units which are typically adjacent to residential areas. Whilst some of the businesses may not be 'friendly' to neighbouring uses, these types of units form the back bone of the Black Country economy and their loss would negatively impact business in the area. The loss would also remove local, sustainable job opportunities.
- 2.50 As set out in our response to Q2 further employment land supply evidence is required. Through this there may be opportunities to replace derelict employment land with housing, however new employment sites tend to be of higher quality, reflecting more modern industries (such as large logistic sites). They are unlikely to replace the smaller industrial unit stock, which have numerous benefits including lower rents, being suited for 'start up' and smaller businesses which reflect of the Black Country's employment

profile. New large, greenfield strategic employment sites are unlikely to be affordable for the types of businesses which currently occupy the smaller industrial unit stock.

- 2.51 With the Black Country facing an overall employment land deficit of 300 ha, the authorities should be seeking to protect the smaller industrial stock where possible and not maximising it for residential uses.
- 2.52 The Councils should also be mindful of the viability of regenerating employment land for residential use, and whether the market could sustain development on these sites. This is demonstrated by the number of previously developed sites in the Black Country allocated for housing but are yet to be delivered, and show no sign of doing so in the near future.

Q12a. Do you support Spatial Option H1? Yes / No; What criteria should be used to select suitable sites? e.g. ability to create a defensible new Green Belt boundary, size, access to existing residential services.

- 2.53 Please refer to our response to Q13a.

Q13a. Do you support Spatial Option H2? What should the characteristics of Sustainable Urban Areas (SUEs) be? e.g. minimum / maximum size, mix of uses, mix of housing types, accessibility to other areas. What criteria should be used to select suitable sites? e.g. proximity to a rail station, availability of existing infrastructure, easy access to jobs, potential to support existing settlements/ services, proximity to the existing growth network, potential to support urban regeneration.

- 2.54 BDW support the broad Housing Spatial Option H2 – Sustainable Urban Extensions.
- 2.55 Whilst there is no definition to the housing numbers associated with ‘rounding off’, this has been taken as any development site consisting less than 500 dwellings (the minimum threshold defined for SUEs).
- 2.56 The NPPF and PPG do not refer to ‘rounding off’ the Green Belt. The NPPF states at paragraph 85 that the boundaries of the Green Belt should be defined clearly, using physical features that are readily recognisable and likely to be permanent. These boundaries should be long term and enduring, and will not require adjustment at the end of the plan period.
- 2.57 Subject to meeting the NPPF and PPG, rounding off of the edges of the urban area within the Green Belt could assist in meeting some of the Black Country’s identified housing needs, however the I&O Report acknowledges that Option H1 would not meet all of the Black Country’s outstanding housing growth.
- 2.58 Larger SUE sites will provide significant contributions towards delivering improved infrastructure given their critical mass. Relying too heavily on smaller sites through rounding off, would compromise the Black Country’s ability to deliver new infrastructure to meet its growth aspirations.
- 2.59 Furthermore, a number of SUEs will be required if the Black Country’s housing shortfall, which cannot be accommodated within the existing urban area (between 14,270 and 24,670 dwellings), is to be met.

- 2.60 Turley is a member of the Home Builders Federation and regularly advises national and local housebuilders. It is unlikely there will be significant market interest in sites of less than 50-100 dwellings. Housebuilders require certainty in their own supply. A site of less than 50-100 dwellings would provide one or two years supply maximum, whereas an SUE site would offer between three and five years supply, depending on the size of the site.
- 2.61 Furthermore the costs associated with installing infrastructure for a site, including constructing the site access, connecting to the appropriate utility grids, establishing a compound, are broadly similar for small and larger scale development. As such smaller sites are less cost effective for housebuilders. This could significantly compromise the potential delivery of the Black Country's housing needs.
- 2.62 In contrast SUEs are likely to have greater market interest. Large scale planned development, which is allocated within a Local Plan, provides certainty and developer confidence, as recognised by paragraph 52 of the NPPF. Therefore the sites are more likely to deliver, and can accommodate multiple housebuilders and outlets, increasing the rate of delivery once the required infrastructure has been installed.
- 2.63 Spatial Option H2 is therefore the most appropriate strategy for accommodating the area's housing shortfall, however Spatial Option H1 can make a small contribution in the right locations.
- 2.64 Any site selection criteria should reflect the NPPF, recognising that planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or **can be made** sustainable. Whilst a potential SUE may not be immediately adjacent to local services or a rail station (which will be the case for the majority of the SUEs given their location on the edge of the urban area), there is the potential to make it more sustainable through new transport links (such as bus services) and on site provision.
- 2.65 Given the critical mass of SUEs, they have the potential to sustain significant on-site services. It must be noted that Pennwood is capable of sustaining on site leisure and retail facilities and all associated infrastructure should its full capacity be allocated.
- 2.66 The BCCS Review should also not make assumptions that SUEs will have major impacts on Green Belt purposes and environmental assets (as suggested in the 'challenges' section for Spatial Option H2). Firstly, any site's performance against the Green Belt purposes is separate to any site selection process. The Green Belt Review is a separate exercise to determining the sustainability of a site. Secondly, SUEs in the Green Belt can have many environmental benefits, including delivering significant public open space (it is widely recognised the Black Country Green Belt is largely inaccessible), as well as biodiversity enhancements.

Q13b. What infrastructure do you think would be needed for different sizes of SUEs?

- 2.67 For the reasons provided in response to Q12a and Q13a, further evidence will be necessary to inform infrastructure requirements for each SUE, including school and healthcare provision. The I&O Report indicates a number of infrastructure assessments

are to be undertaken before the Preferred Options version of the BCCS Review is published.

- 2.68 Furthermore, the Councils should be mindful of site specific evidence bases prepared by developers. Indeed BDW is exploring infrastructure requirements for Pennwood and intends to submit this assessment work during the plan-making process.
- 2.69 The Black County authorities should also liaise with the relevant statutory undertakers (such as Severn Trent and Western Power Distribution) to ensure the BCCS Review includes a robust Infrastructure Delivery Plan.

Q13c. Are there any potential locations that should be considered for SUEs (please submit through the ‘call for sites’ form) and what infrastructure would be required to support these?

- 2.70 Pennwood represents a unique opportunity to create a new community, which could provide between 500 and 1,300 new homes, although it should be noted that up to 1,000 dwelling can be provided to meet Wolverhampton’s needs, whilst the remaining 300 will meet future South Staffordshire housing needs. BDW’s aspirations are to create a new neighbourhood which delivers real health and wellbeing, and economic benefits for both existing and new residents. This includes significant high quality open space, parkland and green infrastructure, well designed homes, and new community facilities.
- 2.71 For example, BDW secured an allocation for up to 2,000 dwellings at Overstone Leys in Northampton. This SUE will help to meet Northampton’s housing need in the West Northamptonshire Joint Core Strategy. A subsequent and successful planning application secured significant residential development, a local centre, primary school and a new section of A43 dual carriageway.
- 2.72 BDW maintained a positive working relationship with both Daventry District Council and Northamptonshire County Council during the plan-making and decision-taking process.
- 2.73 We explore the infrastructure requirements of Pennwood further in the Call for Sites form (**Appendix 2**) and Vision Document (**Appendix 3**) enclosed with these representations.
- 2.74 Given Pennwood’s location within the Green Belt we provide an assessment against the five purposes for including land within the Green belt below.

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

- 2.75 Pennwood is bound by residential development to the north, east and south-east, whilst residential properties lie immediately adjacent to the western boundary separated from the site by a strip of agricultural land. As such Pennwood is enclosed by existing built form along three boundaries. At present the Green Belt boundary projects into the urban form of Wolverhampton, utilising the built form along Hornby Road / Park Hall Road, Wolverhampton Road East and Alderdale Avenue as the defensible boundaries.
- 2.76 The release of Pennwood would not result in any unrestricted sprawl of the built up area and on the contrary it would actually contain development within an existing urban form.

2.77 Consequently, the enclosed nature of Pennwood results in the land making a low contribution to the Green Belt in relation to checking the unrestricted sprawl of Wolverhampton. It is anticipated that once Pennwood is released from the Green Belt, the newly formed boundary will better correspond with the urban form of the surrounding area and present a logical Green Belt boundary to protect against any unrestricted sprawl of the future built-up area.

Purpose 2 – To prevent neighbouring towns merging into one another

2.78 An important requirement of the Green Belt is to prevent neighbouring towns from merging however paragraph 85 of the NPPF sets out that there may be opportunities for land to be released from the Green Belt that would assist in creating longer term permanent defensible boundaries.

2.79 Pennwood currently presents a gap in the urban form of Wolverhampton and residential development is located in the immediate vicinity to the north, east, south east and west of the site. As illustrated on Wolverhampton's policies map, the existing Green Belt boundary protrudes to the north-east (to include the site). To release this site from the Green Belt in its full capacity would not result in any neighbouring towns merging into one another. This is illustrated by the Development Options in the enclosed Vision Document, which offer a generous amount of green infrastructure and open space to restrict Upper Penn and Sedgley from merging. In addition, a new defensible boundary could be formed to the south-western edge of development adjoining Penn Common.

Purpose 3 – To assist in safeguarding the countryside from encroachment

2.80 Paragraph 84 of the NPPF states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. As such, development should be focussed towards urban areas inside the Green Belt boundary, towards towns and villages.

2.81 Pennwood adjoins the urban area of Wolverhampton and the Development Options contained with the enclosed Vision Document illustrates the preservation of a green corridor to the west and south-west of the site. The early stage of masterplanning demonstrates how a landscaped view corridor can be included within the proposals and in particular how the existing landscape, including woodland, and ecological assets such as hedgerows and wildlife, can play a key role in the design of the community.

2.82 In accordance with the guidance set out in the NPPF, Pennwood is located towards the urban area of Wolverhampton and the release of this site from the Green Belt would not result in a detrimental encroachment into the countryside, as illustrated within the early stages of masterplanning for Pennwood.

Purpose 4 – To preserve the setting and special character of historic towns

2.83 Pennwood is not located within close proximity to any historical town. In historic landscape character terms, the site is partly located in the Goldthorn / Lower Penn Green Wedge and was formerly a 'Special Landscape Area' both of which place emphasis on the retention of the 'attractive' landscape; whilst such land should provide recreation facilities and access to the countryside for the urban population can be available.

- 2.84 As discussed in response to Purpose 3, the early stages of masterplanning have demonstrated how important landscaping is for the proposed development site and in particular the proposals will comprise a large landscape buffer, protecting the setting for Upper Penn. Furthermore, Pennwood is not located within the setting to a historic town and as such this purpose is not considered to apply in this circumstance.

Purpose 5 – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 2.85 The BCCS I&O Report sets out that there is a requirement for the Black Country Authorities to accommodate approximately 22-25,000 new homes. It has been established that the Black Country has severely limited opportunities to accommodate this anticipated growth within the present urban boundaries and it is therefore necessary to consider Green Belt release.

Q13d. Do you think that the Core Strategy should set out detailed guidance for the development of SUEs (e.g. type and tenure of housing, specific infrastructure required), rather than details being determined at a local level in light of local policies?

- 2.86 Any guidance for SUEs should not be considered until later in the preparation of the Plan, and should be informed by the relevant evidence base (including site specific evidence, the SHMA, and infrastructure assessments). Any guidance should be flexible to ensure the Plan is able to respond to the most up to date evidence and be in line with paragraph 173 of the NPPF.

Q15a. If all housing need cannot be met within the Black Country, do you support the 'export' of housing growth to neighbouring authorities within the HMA? What factors should be taken into account in an assessment of the opportunities in neighbouring authorities e.g. proximity to the edge of the urban area, proximity to a rail station, availability of existing infrastructure, easy access to jobs?

- 2.87 The NPPF is clear that local planning authorities should have fully explored all available options for delivering their housing needs within their own administrative boundaries before considering exporting growth to neighbouring authorities or the wider HMA. Equally, neighbouring authorities will not accept accommodating any of the Black Country's needs if this exercise has not been thoroughly undertaken. Telford and Wrekin has so far declined to assist in meeting any of the Black Country's shortfall given this exercise had not been undertaken. As such this option should only be considered as a last resort.
- 2.88 It is also important to recognise that following the adoption of the Birmingham Development Plan there is an acknowledged shortfall of housing of approximately 38,000 homes across the Greater Birmingham HMA, the majority of which is a direct consequence of Birmingham's failure to accommodate its own needs in full. To date, whilst a number of emerging plans have confirmed the inclusion of additional provision to accommodate a proportion of this unmet needs the full scale of the unmet need has not been accounted for. The I&O Report references a commitment to test the accommodation of an extra 3,000 homes up to 2031 beyond local need to help address the wider HMA shortfall. Any attempt by the Black Country authorities to 'export' further

unmet housing needs will compound the uncertainties associated with ensuring that needs are met in full across the HMA in the immediate term in particular.

- 2.89 In this context the Black Country should be seeking to accommodate all of its proposed growth within its own boundaries, and therefore should fully consider the prospect of delivering up to 1,000 new dwelling at Pennwood as illustrated in Development Option 2 of the enclosed Vision Document.

Q21. Do you think that changes are required to policy DEL1 to ensure it covers both development within the existing urban area and any within the Green Belt?

- 2.90 As set out in our response to Q1 a full review of the BCCS is necessary. This applies to Policy DEL1 also, particularly as the policy currently only reflects development within the urban area.
- 2.91 Given the characteristics and viability matters which differ between brownfield and greenfield sites, the BCCS Review should have separate policies for each.

Q25. Will there be any new social infrastructure requirements necessary to serve large new housing developments? If yes, please explain the type and scale of any new social infrastructure required.

- 2.92 Please refer to our response to Q28.

Q28. Do you think physical infrastructure is necessary to serve large new housing developments? If yes, what type and scale of physical infrastructure is necessary?

- 2.93 Paragraph 5.7 of the I&O Report sets out that as options for the location of major new housing allocations develop through the review process, so will decisions about the need for any such facilities and their locations.
- 2.94 This approach will be necessary to understanding the full infrastructure requirements for new sites. As set out in response to Q2, the infrastructure assessments to be undertaken will be crucial in understanding these requirements further. This should also be informed by any site specific evidence base work undertaken by developers, as well as liaison with infrastructure providers (including statutory undertakers).

Q29. Do you think there are any other tools or interventions that could be used to ensure enough infrastructure is provided by developments?

- 2.95 As set out in response to Q2, the infrastructure assessment work to be undertaken by the authorities will be critical to informing what infrastructure will be necessary to unlock new development.
- 2.96 Since the BCCS was adopted it is apparent that it is unviable for some brownfield sites to deliver the necessary infrastructure to assist their delivery (as much is acknowledged at Section 2 of the I&O Report). The four authorities should therefore satisfy themselves that it is viable for new development to contribute towards providing infrastructure to meet their needs, including through Section 106 contributions or the Community Infrastructure Levy, and that any onerous policy requirements in relation to matters such as housing mix or sustainable design features does not compromise viability.

- 2.97 Other tools and interventions should not be relied upon if they have not been confirmed as available to improve infrastructure before the BCCS Review is adopted.

Q31. Do you think that the right scale and form of funding is available to support the delivery of the Core Strategy Review? If no, what alternative sources of funding or delivery mechanisms should be investigated?

- 2.98 The recently published WMCA Land Delivery Action Plan identifies sources of funding and immediate priorities. Of the £200 million Land Remediation Fund, £53 million is already allocated to the Black Country and a further strategic package of £97 million is available to be drawn down by the LEP. However, the Action Plan states on page 44 that “to fund the current pipeline of brownfield sites in the Black Country, a total of £700m of further LRF funding is required”. This, it states, will be a key requirement of the Housing Deal the WMCA is hoping to negotiate with CLG.

- 2.99 Whilst the funding to date is a good start, it is clear that it is a fraction of the total needed to deliver a substantial step change in brownfield delivery. As set out in our response to Q29, it is crucial the four authorities are satisfied of the scale and pace of delivery and that it is viable for new development on brownfield sites to contribute towards providing infrastructure to meet their needs. The role of greenfield locations to deliver market housing and contribute fully to meeting infrastructure costs should therefore be a key component to derisk the BCCS housing strategy.

Q32. Do you think that the proposed approach to incorporate health and wellbeing issues in the Core Strategy review is appropriate? If no, please provide details

- 2.100 Please refer to our response to Q34b.

Q33. Is there more that the Core Strategy can do to address health and wellbeing issues in the Black Country? If yes, is a new policy needed to address such issues for example?

- 2.101 Please refer to our response to Q34b.

Q34a. Do you agree that the health and wellbeing impacts of large development proposals should be considered at the Preferred Spatial Option stage of the Core Strategy review through a Health Impact Assessment approach?

- 2.102 Please refer to our response to Q34b.

Q34b. What design features do you think are key to ensuring new development encourages healthy living, which could be assessed through the HIA process?

- 2.103 We support the strategy to incorporate health and wellbeing issues in the BCCS Review. Health and wellbeing underpin sustainable planning and creating places where people want to live.
- 2.104 The Health and Wellbeing Technical Paper (June 2017) emphasises the importance of integrating health and wellbeing into all policies, including those of the emerging BCCS Review. In particular, the technical note encourages the creation of communities which are:

- Well-connected and walkable;
- Have a wide choice of homes;
- Accessible to services; and
- Where people can belong to a cohesive community which fosters diversity, social interaction and social capital.

2.105 As such, health and wellbeing should not be standalone policies in the plan, but rather should be a 'golden thread' running through the review and all policies. Any sites promoted through the Local Plan process should demonstrate their health and wellbeing benefits if they are to be proposed for allocation.

2.106 As demonstrated by the Vision Document (**Appendix 3**) submitted with these representations, health and wellbeing are key principles at the heart of the proposals for Pennwood. It will include significant new green infrastructure accessible to the public, such as new open space and links to sites of local importance for nature conservation. New pedestrian and cycle links will form a key component of the proposals, linking Pennwood to urban areas to the north, east and south-east.

Q35. Do you support the proposed approach to housing land supply? If no, please explain why.

2.107 The BCCS Review proposes at paragraph 6.30 to 'update' Policy HOU1. As set out in our response to Q1 a full review of the Plan is necessary given there are now greater housing needs, the NPPF has been published and the WMRSS has been revoked, and the adopted BCCS has not been delivering the required level of growth. As such the approach to housing land supply should be reviewed in full also.

2.108 Given there is a shortfall of 3,039 dwellings against the targets set in the adopted BCCS (a shortfall of 1,396 in Wolverhampton), largely as a result of brownfield sites not being developed due to viability issues, the Review should include a 10% lapse rate should be applied to the requirement to ensure flexibility in deliverability should sites in the supply not come forward.

Q36. Do you think that the current accessibility and density standards set out in Policy HOU2 and Table 8 should be changed? Yes/ No; If yes, what standards should be applied instead, for example should the minimum net density of 35 dwellings per hectare be increased to maximise brownfield housing delivery?

2.109 Please refer to our response to Q42.

Q40. Do you agree that the 2017 SHMA findings should be used to set general house type targets for the Plan period? Yes/ No; If no, please explain why.

2.110 Please refer to our response to Q42.

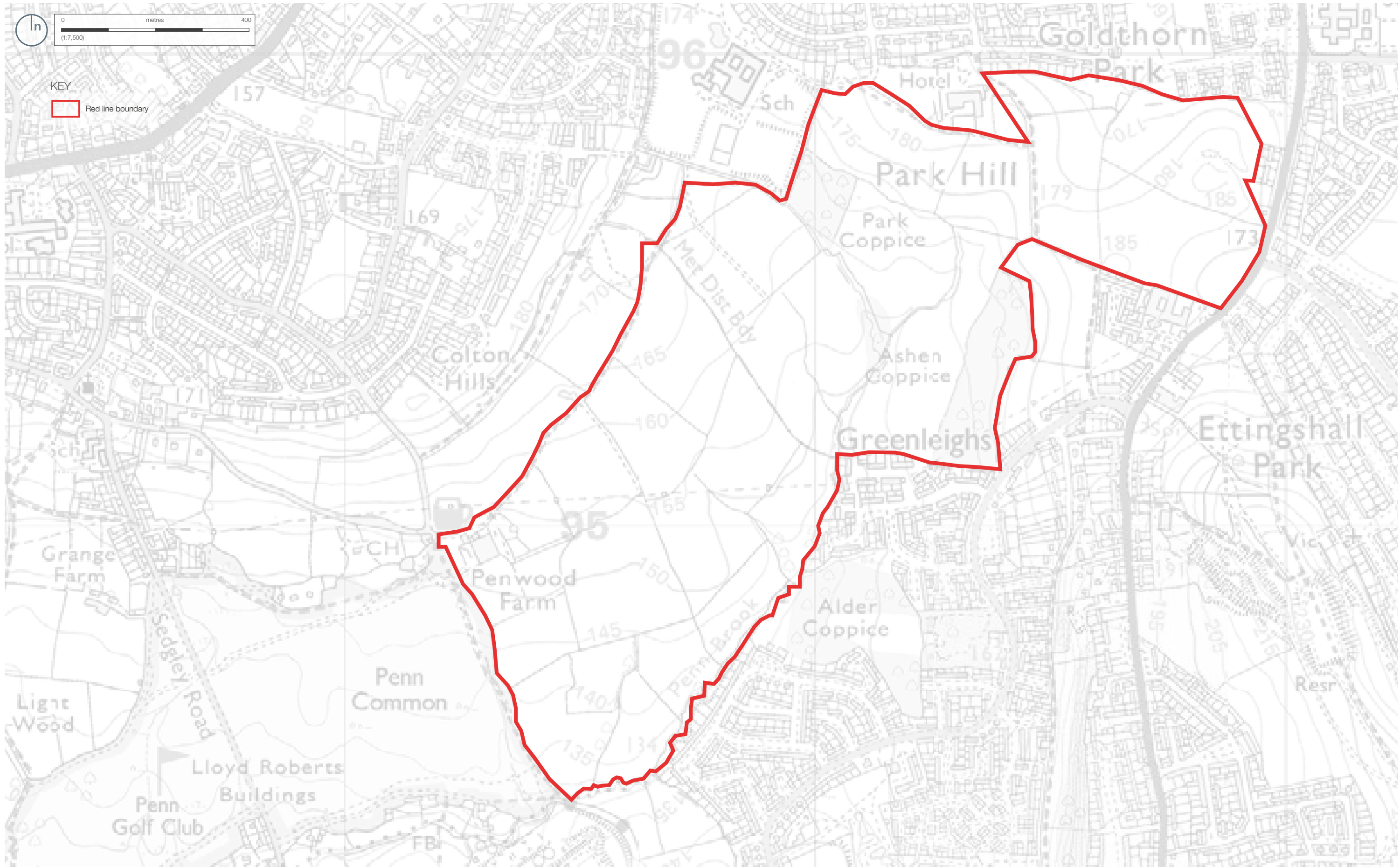
Q42. Do you agree that the annual affordable homes target should be increased to reflect the 2017 Black Country Strategic Housing Market Assessment? If no, please explain why.

- 2.111 The NPPG states that wherever possible, local needs assessments should be informed by the latest available information and the government's official population and household projections are generally updated every two years.
- 2.112 The affordable housing requirement; preferred housing mix; housing types; and density standards for the Black Country therefore need to remain fluid in order to respond to the most up to date evidence and market conditions. The BCCS Review should not comprise policies that set standards for the whole Plan Period. The standards set out in Policy HOU2 should be reviewed in full to ensure they comply with the NPPF, PPG and the most up to date guidance.
- 2.113 Pennwood will be capable of delivering a range of house types, including high quality larger 'professional / executive' type housing which is currently in short supply in Wolverhampton and results in residents moving out the City to find suitable housing.

3. Conclusion

- 3.1 We welcome the opportunity to engage with the Black Country authorities in respect to the emerging BCCS Review.
- 3.2 Since the Black Country Core Strategy (BCCS) was adopted in February 2011 the West Midlands Regional Spatial Strategy has been revoked and the National Planning Policy Framework has been published, representing a significant change in the planning policy context. The Black Country's ambitious housing and employment needs are now much greater, and the area has not been meeting the targets set out in the BCCS. A full review of the Plan is therefore necessary to ensure it is robust and meets the requirements of national planning policy.
- 3.3 In meeting the proposed level of growth Green Belt release will be necessary. BDW is promoting land at Pennwood for up to 1,300 new homes, new open space and community facilities. The site is in a sustainable location and can make a significant contribution to meeting the Black Country's housing needs.
- 3.4 Sustainable Urban Extensions such as that proposed at Pennwood can play a critical role in meeting the Black Country's anticipated level of housing growth. It will provide a critical mass which can sustain new services and facilities on the site, and will deliver environmental benefits, contributing to the health and wellbeing of existing and future residents.
- 3.5 We trust that the information provided within these representations will be considered by the Black Country Authorities and we welcome the opportunity to engage and promote Pennwood through the progression of the BCCS Review.
- 3.6 We would welcome meeting the Black Country authorities to discuss these representations and the enclosed Vision Document and Call for Sites form.

Appendix 1: Site Location Plan



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Promap

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Client:
Barratt Homes and David Wilson Homes

Project:
Penwood Farm

Drawing:
Site Location Plan

Project Number:
BARQ3017

Drawing Number:
1000

Revision:
00

Scale:
1:7500 @ A3

Status:
Draft

Date:
May 2017



Appendix 2: Call for Sites Form

Black Country Core Strategy Review - Call For Sites Form

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.

Call for Sites submissions should only be made for sites within the Black Country or sites within neighbouring authorities but adjoining the Black Country urban area. However, submissions will be accepted for any site within a neighbouring authority which could potentially form part of a larger development which would adjoin the Black Country urban area, to allow discussions to take place with adjoining authorities. If your submission relates to a site which stretches beyond the Black Country into a neighbouring authority then this should be clearly stated and evidence of submissions to that neighbouring authority provided.

This form asks you to provide details about the site including location, ownership, current use, access, constraints, services and possible future use. Please provide as much information as possible to ensure your site proposal can be carefully considered. You can submit as many sites as you wish by completing a separate form and site boundary for each site.

It should take around 15 minutes to complete the information for each site you wish to put forward, depending on the amount of detail you wish to provide.

If you are acting on behalf of someone else you will be asked to provide their details.

The information you provide will be used to help prepare the Core Strategy review and will be shared with other employees or agencies (such as the Planning Inspectorate) who may be involved with the process. Please note that the local authorities are obliged to make the Call for Sites submissions available for public inspection. This means that, with the exception of telephone numbers, email addresses and signatures, your comments and other personal details that you provide will be publicly available. We therefore encourage you to avoid providing sensitive information that you do not wish to be published.

If you have any queries about the questionnaire please contact:
blackcountrycorestrategy@dudley.gov.uk

call: Dudley: 01384 814136 | Sandwell: 0121 569 4249 | Walsall: 01922 658020 |
Wolverhampton: 01902 554038

Please complete and submit by 5pm on the 8th September 2017.

Please provide your up-to-date contact details. If you are acting on behalf of someone else you will be asked to provide their details later in the questionnaire. Fields marked *will not be shared with anyone outside the Core Strategy review process. The contact details you provide will be held securely but we are required to publish your name and / or organisation alongside your submission.

1. Title

2. First Name

3. Last Name

4. Organisation/Company Name (where relevant)

5. Address Line 1*

6. Address Line 2*

7. Address Line 3*

8. Post Code*

9. Email Address*

10. Phone Number*

Details for Site

The following questions ask about the location of the site. You are required to map the location of the site using a link on the consultation website once you have completed this questionnaire.

17. Site Name

Land at Pennwood

18. Site Address

Easting: 391408, Northing: 295690

19. Postcode

N/A

20. Site Area in Hectares

114.8

21. Site Area in Hectares of land suitable for development, if different to above

43.9

22. Please provide a brief summary of the current use(s) of this site or last known lawful use(s)

Agricultural

Details for Site

The following questions ask what you think the site could potentially be used for, what services are available and any related constraints on the site.

23. What use or mix of uses do you propose for this site? Please tick all that apply.

- | | |
|--|--|
| <input checked="" type="checkbox"/> Private Market Housing | <input type="checkbox"/> Retail |
| <input checked="" type="checkbox"/> Affordable Housing | <input checked="" type="checkbox"/> Open Space or Sports Pitches |
| <input type="checkbox"/> Industry or Storage (Use Classes B1b/c, B2 or B8) | <input checked="" type="checkbox"/> Community Facilities (including health or education) |
| <input type="checkbox"/> Offices (Use Class B1a) | <input checked="" type="checkbox"/> Sports / Leisure |
| <input type="checkbox"/> Gypsy and Traveller/ Travelling Showpeople Site | <input type="checkbox"/> Any other use (please specify below) |
| <input type="checkbox"/> Waste Management | |
| <input type="checkbox"/> Mineral Extraction | |

Any other use or a more specific proposed use for the site e.g. type of employment or type of open space please specify

Public open space

24. If housing or employment is proposed, please specify how many homes or how many hectares of employment land you think could be accommodated on the site.

Up to 1,000 new homes within the administrative boundary of the Black Country authorities.

25. What services are currently available at this site? Tick all that apply

- Mains water
- Mains sewage
- Electricity
- Gas
- Oil
- Broadband
- None
- Not Known

26. What constraints, if any, affect this site? Please provide details below for each constraint.

- Land in other ownership must be acquired to develop the site
- Restrictive covenants - what land uses do these prevent or require?
- Current use needs to be relocated
- Rights of way (public or otherwise) across the site
- Contamination known or suspected
- Previous mining activity known or suspected
- Public Open Space
- Flood risk / drainage problems
- Ground instability (not linked to mining)
- Watercourse / culvert / other water body
- Area of mature woodland / tree preservation order
- Undulating or steeply sloping ground
- Underground services
- Pylons crossing the site / sub – station
- Constraints on adjoining land e.g. railway line, noisy industry
- Protected species / habitats
- Historic building / landscapes
- None of these

Please provide supporting details for each constraint identified above.

Please see attached Vision Document.

27. Is the site agricultural land? If so, then what is the agricultural land classification? Please provide survey results, including mapping.

Yes, the site is agricultural land.

According to DEFRA's online mapping tool 'Magic Map' the site is in its entirety Grade 3 Agricultural Land.

28. **If there is a current use of the site that needs to be relocated what arrangements are required to achieve this relocation? e.g. manufacturer currently on the site needs to move to a building of xx square meters with good access to the motorway.**

N/A

29. **What new infrastructure do you think will be required to support the development of the site?**

- Major Roads
- Flood mitigation system
- Primary School
- Secondary School
- Local shops
- A new local centre
- A new park / open space
- Footpaths and cycleways
- Other

Please provide supporting details for the above.

N/A

30. **Are there any existing or historic planning permissions on the site? If yes please include any details e.g. application reference number.**

- Yes No Don't know

31. **Is the land available immediately for development (subject to obtaining any necessary planning permissions)? Tick one only.**

- Yes No Don't know

If no, please explain why not and give an estimated timescale for when it will become available.

32. Is there any current market interest in the site, other than from you / your client? Tick all that apply.

- Owned by developer
- Under option to developer
- Enquiries received from prospective purchasers / developers
- Site being marketed
- None
- Not known

Please provide further details of the market interest in this site.

N/A

33. Once started how many years do you think it would take to develop the site?

10 years

34. Do you think it is likely that there will be viability issues with developing the site that will require the use of external funding?

No

35. Have you previously contacted a Black Country or neighbouring authority about this site? Tick one only.

- Yes No

If yes, please provide brief details e.g. who you contacted and when and the current position of discussions.

Barratt Homes and David Wilson Homes met with Kelly Harris of South Staffordshire District Council and Michele Ross of Wolverhampton City Council on 17th July to discuss the merit behind promoting the site through the BCCS Review.

36. Please provide any additional comments you may have that are relevant to the site you are putting forward.

N/A

37. Each site will need to be visited to enable an assessment of the site. By completing this form you consent to Council employees (or their representatives) visiting the site. Visits will be conducted unaccompanied wherever possible. Where there are reasons why an unaccompanied site visit would not be practical please indicate below so that alternative arrangements can be made.

An unaccompanied site visit would not be practical. Alternative arrangements can be made by contacting Ruth Farrell at DJM Consulting.

If acting on behalf of someone else please provide details here

Please provide the details of the individual or organisation you are representing. Please ensure you have consent from the individual or organisation prior to providing their details. Fields marked *will not be shared with anyone outside the Core Strategy review process.

38. Title

39. First Name

40. Last Name

41. Organisation / Company Name

Barratt Homes and David Wilson Homes

42. Address Line 1*

c/o Agent.

43. Address Line 2*

44. Address Line 3*

45. Post Code*

46. Email Address*

47. Phone Number*

48. Has the landowner been informed of this Call for Sites submission? Tick one only.

Yes

No

Site Boundary

The boundary of your site must be mapped and provided on an OS based map at a scale that shows field, property and adjacent road boundaries.

All of the site boundaries and Call for Site forms will be reviewed by the four authorities for accuracy. Following this all mapped sites will be visible to the public.

If you would like us to consider other documents, such as draft layout plans, masterplans or design statements, please attach these to your site submission.

Thank you for submitting your site details. If you wish to submit details for further sites please complete a new form.

Appendix 3: Vision Document

An aerial photograph of a rural landscape, showing a mix of green fields, brownish-tan agricultural plots, and a network of roads and paths. The terrain appears to be a valley or a similar low-lying area. The overall color palette is dominated by various shades of green and brown, with some white highlights from buildings or structures.

Land at Pennwood Vision Document

September 2017

Turley

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01 Introduction

This document is part of a suite of technical work which demonstrates the opportunity for delivering new housing on land at Pennwood, Wolverhampton. The proposals would make a significant contribution to meeting the Black Country and South Staffordshire's emerging ambitious housing needs.

1.1 It presents three different spatial options for how the opportunity at Pennwood could be realised, depending on the scale of housing need, taking into consideration the site's context and surroundings.

1.2 Barratt Homes and David Wilson Homes have aspirations to deliver a landscape led proposal for Pennwood, which will meet the ambitions of the local community, and create new homes where people will want to live.

The Structure of this Document

1.3 This document will first set out the site's context in terms of planning policy and spatial attributes. This section will conclude with an analysis of the site's constraints and opportunities.

1.4 The second half of this document will establish broad design principles for the site and explore two Development Scenarios for how the site might come forward to deliver the needs of the local community.

The site

1.5 The total site is approximately 115 Ha in size. It is located 3.5km south of Wolverhampton city centre and is situated in the Penn Common between the village of Sedgley directly on the eastern boundary, the area of Penn to the west and the suburb of Goldthorn Park to the north.

1.6 The site is used for agricultural purposes and equestrian purposes. Penn Golf Club lies on the south-western boundary of the site. The southern boundary is currently formed by Dudley Metropolitan Borough Council's administrative boundary.

1.7 The southern area of the site rises to the north western boundary (towards Penn) and falls toward the Penn Brook Valley. The northern area of the site is undulating with several elevated sections. The site contains a number of landscape features including Penn Brook, Ashen Coppice, Park Coppice and Penn Wood which will be retained/enhanced moving forward.





COLTON HILLS
COMMUNITY
SCHOOL

JEREMY ROAD

RAMADA PARK
HOTEL

PARK
COPPICE

ASHEN
COPPICE

BEACON CENTRE

A1665 WOLVERHAMPTON ROAD

WAKELEY HILL

THE BARLEY
MOW PUB

ASHEN CLOSE

ETTINGSHALL PARK

PENN WOOD
GOLF CLUB

ALDER COPPICE

POTENTIAL
RETENTION
OF SOLAR
FARM

PENN BROOK

PENN BROOK

Location Plan





02 Site Context



This section identifies the relevant matters contained within the National Planning Policy Framework (NPPF) and the emerging Black Country Core Strategy (BCCS) Review (July 2017).

2.1 This section will discuss the following topics:

- Planning Background
- Landscape
- Utilities
- Heritage
- Access and Sustainability
- Constraints Summary
- Development Opportunities

Planning Background

National Planning Policy Framework

2.2 Paragraph 17 is clear that Councils should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

2.3 Paragraph 52 recognises that new homes can be best achieved through planning for larger scale development, such as new settlements.

2.4 Paragraph 83 sets out that Green Belt boundaries should only be altered in 'exceptional circumstances'.

2.5 Paragraph 84 states that when drawing up Green Belt boundaries, local authorities should take account of the need to promote sustainable development.

2.6 Paragraph 85 states that the boundaries of the Green Belt should be defined clearly, using physical features that are readily recognisable and likely to be permanent. These boundaries should be long term and enduring, and will not require adjustment at the end of the plan period.

Black Country Core Strategy Review

2.7 The Black Country Local Authorities are currently undertaking a review of the adopted Black Country Core Strategy (2011). The first stage of the review, the Issues and Options Report ('the Report') in July 2017.

2.8 The Report identifies that the Black Country's ambitious objectively assessed housing need is 78,190 homes over the period 2014-2036. The Report is clear at paragraph 3.17 that the Black Country will not be able to accommodate this within the urban area and therefore Green Belt release will be necessary.

2.9 The Report identifies that a shortfall of between 14,270 and 24,670 dwellings cannot be accommodated within the urban area and will therefore require Green Belt release. This need establishes an 'exceptional circumstance' for reviewing the Black Country's Green Belt boundaries, which have remained largely unaltered for over 30 years.

2.10 The Report acknowledges that 'rounding off' around the edges of the urban area will make a limited contribution to the shortfall, and that Sustainable Urban Extensions will play a role in meeting this need.

Emerging South Staffordshire Local Plan

2.11 The Black Country and South Staffordshire Strategic Housing Market Assessment (June 2017) indicates that South Staffordshire will need to plan for 5,691 dwellings (259 dwellings per annum) between 2014 and 2036. South Staffordshire's Development Plan will be reviewed next year, following the adoption of the Site Allocations Document. This will consider the District's future needs.

Landscape

2.12 High level Landscape and Visual advice has been prepared by Turley VIA. It identifies the opportunities and constraints in terms of likely landscape character and visual amenity issues for promoting development at Pennwood. A preliminary desk study was first undertaken to establish the physical components of the site and its surroundings. Potential visual receptors to the site from the surrounding area were also identified. Ordnance Survey (OS) maps were utilised to identify these features together with aerial photography. A field study was then undertaken by a landscape specialist from Turley VIA on 10 October 2016. The weather was sunny, the visibility was good. The field study recorded the Site and surrounding context's landscape features and visual receptors identified in the desk study. The field study also involved travelling throughout the study area and producing a working photographic record.

Key Landscape and Visual related Planning Policy/ Guidance

- The whole site falls under Green Belt designation which does not provide an indication of landscape value but the openness, as an essential characteristic of the Green Belt, and the views across the area can be considered in determining visual sensitivities.
- The northern part of the site is located within the City of Wolverhampton Council which is also one of the four Black Country Local Authorities. Local policies relevant to the site include:
 - The Black Country Core Strategy, Policy ENV2 identifies land broadly surrounding Park Hill to the north of the site as a 'Black Country Landscape Beacon'. These beacons are largely undeveloped high prominences and elevated landmarks which divide and help to define individual communities.
 - The Wolverhampton UDP identifies the northern area of the site as the 'Goldthorn/ Lower Penn' wedge under Policies G1/G2 (relating to Green Belt). The policy outlines the importance of open space in separating settlements; helping to retain attractive landscapes and agricultural uses; providing recreation facilities; and, offering access to the open countryside for the urban population.
- The southern part of the site falls within South Staffordshire Council and was formerly a 'Special Landscape Area'. This policy has been replaced in the adopted core strategy with Policy 'EQ4 – Protecting and Enhancing the Character and Appearance of the Landscape'. The supporting policy information includes the following relevant guidance:
 - 'The intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced. Trees, veteran trees, woodland, ancient woodland and hedgerows should be protected from damage and retained unless it can be demonstrated that removal is necessary and appropriate mitigation can be achieved. For visual and ecological reasons, new and replacement planting should be of locally native species.'
 - 'Throughout the District, the design and location of new development should take account of the characteristics and sensitivity of the landscape and its surroundings, and not have a detrimental effect on the immediate environment and on any important medium and long distance views.'

- 'The siting, scale, and design of new development will need to take full account of the nature and distinctive qualities of the local landscape. The use of techniques, such as landscape character analysis, to establish the local importance and the key features that should be protected and enhanced, will be supported.'
- In the Black Country Historic Landscape Characterisation report the northern part of the site falls within 'Character Area WV11 – Blakenhall, Bradmore & Penn' which recognises:
- 'In the south-central part of the area, against the boundary shared with Dudley, and on top of the ridge referred to above, there is an important green space (Park Hill).
- In the South Staffordshire Planning for Landscape Change SPG the southern part of the site is identified as being of 'high landscape quality' within a landscape policy objective area for 'landscape maintenance'. The supporting text states:
- 'In most cases the existing economically-determined pattern of land use has resulted in these landscapes of high quality. There is therefore a lesser need for the targeting of landscape conservation resources to these areas. However, there is a danger that a change in the farming or land use pattern could have rapid and serious consequences for landscape quality.'



2.13 A series of landscape and visual opportunities and constraints are identified below and supported by two sketch figures that were provided to the design team to inform the development of the Parameter Plan. Broad areas of higher and lower sensitivity were identified to consider areas that could have potential to accommodate development in landscape and visual terms. Areas indicated of higher sensitivity although having greater constraints in landscape and visual terms, may still have capacity to accommodate some development subject to the appropriate use of mitigation measures, scale and massing of built development and siting in relation to planning policy.

Landscape Constraints

- Areas of Ancient Woodland and local importance for nature conservation located centrally to the northern part of the site should be retained with built development sufficiently offset to avoid adverse effects on root protection areas. Ancient woodland is referred to as an irreplaceable habitat in the National Planning Practice Guidance (para 118).
- The historic field patterns should be preserved or reflected within any proposed development layout as an identified important characteristic of the landscape.

- The southern part of the site has a strong rural character and is partly identified as being of high landscape quality and higher landscape sensitivity in planning policy and landscape character studies than the northern element of the site.

Landscape Opportunities

- Fragmented hedgerow structure provides the opportunity for enhancement to strengthen this recognised important part of the landscape character.
- Opportunity to improve the management of existing landscape features across the site and provide connected wildlife corridors.
- The rural quality and tranquillity of the site has been intruded on by prominent urbanising features such as residential development, pylons, a mast and noise from the A59. This existing urbanising influence on the landscape character establishes the sites capacity to accept development.
- Opportunity to provide enhanced public open space within the site, providing vantage points from elevated parts of the site and space for informal recreation. This could correspond with landscape buffers to the northern areas of the site to reinforce separation between settlements.

KEY

- District Authority Boundary
- Site boundary
- Goldthorn/ Lower Penn wedge
- Ancient Woodland
- ▨ Site of local importance for nature conservation
- Prominent built form
- Electricity pylons
- Areas of lower landscape sensitivity
- Areas of higher landscape sensitivity
- ★ Broad location of 'Black Country Landscape Beacon'

NOTE: Areas indicated of higher sensitivity although having greater constraints in landscape and visual terms, may still have capacity to accommodate some development subject to the appropriate use of mitigation measures, scale and massing of built development and siting in relation to planning policy.



Visual Constraints

- The amenity value of the network of public rights of way enclosing and crossing the site should be preserved through green corridors and mitigation planting.
- The north eastern part of the site is elevated and provides a visual break between the two settlement areas of Ettingshall Park and Goldthorn Park as identified in the Black Country Core Strategy and the Wolverhampton UDP.
- The site is perceived as an open band of countryside in some panoramic viewpoints from public rights of way eg. The footpath to the south of the site at Ettingshall Park and the footpath that runs along the northern site boundary.
- Elevated parts of the site contribute to a green buffer between settlements in linear views from local residential streets eg. Northway, Farringdon Road, Linslade Close.

Visual Opportunities





- The undulating topography offers visual containment to the lower lying parts of the site including areas to the southwest corner and to the north of Greenleighs.
- A strong landscape framework including woodland, tree belts and hedgerows
- Provide visual containment to areas of the site and offers a good potential for landscape mitigation. The proposed layout should reflect this framework.
- There are existing visual connections with the surrounding built form.

2.14 The north eastern corner of the site is more heavily influenced by the surrounding townscape which has an urbanising influence on the landscape character. Visually, this area is elevated and is part of the Goldthorn/ Lower Penn wedge which contributes to both the visual and physical separation between the two settlements. In landscape and visual terms this area could have potential to accommodate pockets of development, however, a distinct visual separation between Goldthorn Park and Ettingshall Park would need to be retained to correspond with planning policy.

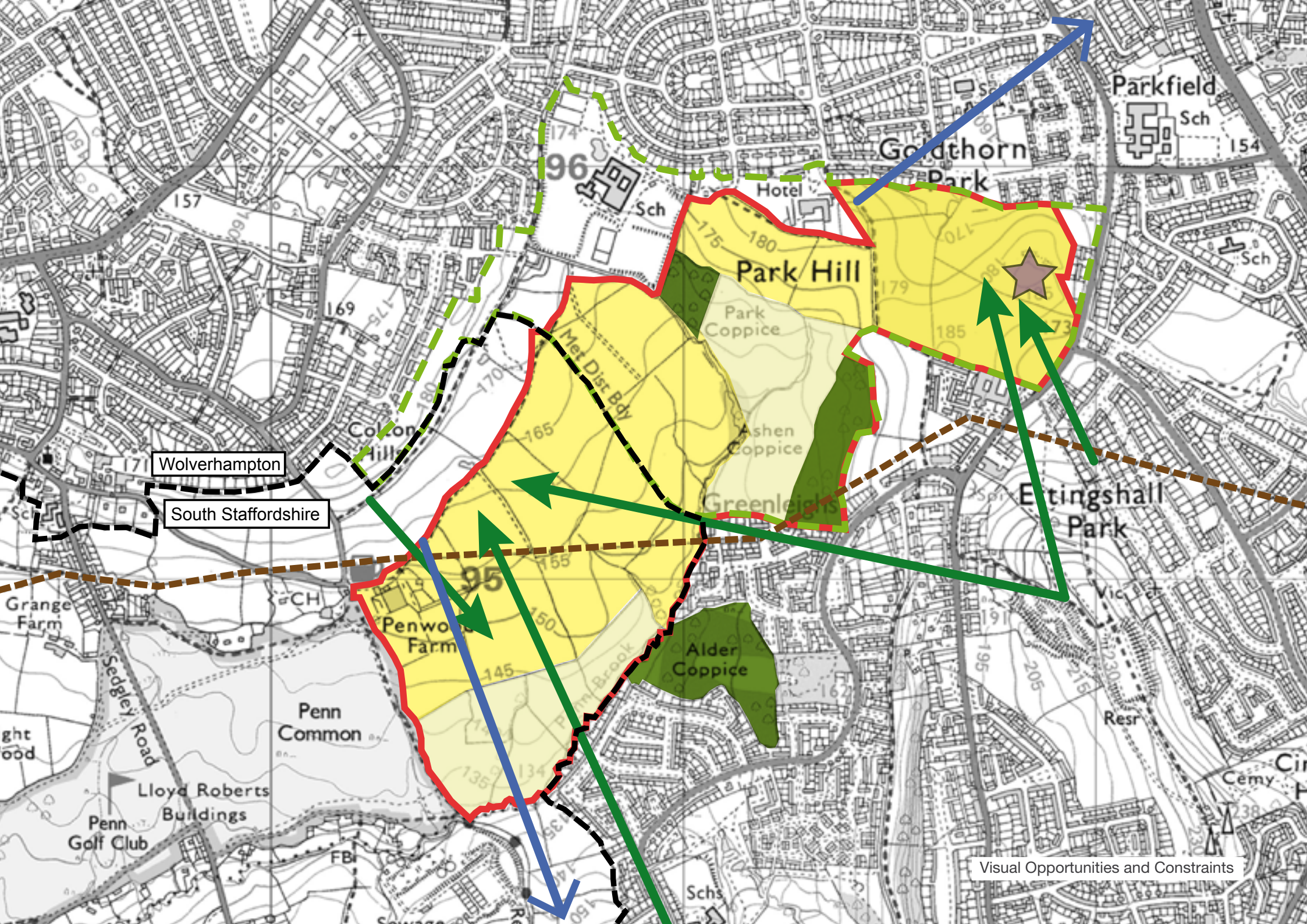
2.15 The central section of the site has parcels that are visually contained due to dense woodland belts. The sensitivity of the landscape character is higher in this area due to its rural quality, with less detracting features and the presence of Ancient Woodland, Penn Brook and areas of ecological value.

2.16 The south western corner of the site is visually contained in the wider landscape, due to the surrounding topography, woodland and vegetation associated with Penn Brook. The landscape character of this area is of higher sensitivity, however, existing urbanising features and a strong landscape framework offer the scope to accommodate development in this area in landscape and visual terms.

KEY

	District Authority Boundary		Areas of lower visual sensitivity
	Site boundary		Areas of higher visual sensitivity
	Goldthorn/ Lower Penn wedge		Broad location of 'Black Country Landscape Beacon'
	Ancient Woodland		
	Key views out of site		
	Key views towards site		

NOTE: Areas indicated of higher sensitivity although having greater constraints in landscape and visual terms, may still have capacity to accommodate some development subject to the appropriate use of mitigation measures, scale and massing of built development and siting in relation to planning policy.



Wolverhampton

South Staffordshire








Visual Opportunities and Constraints

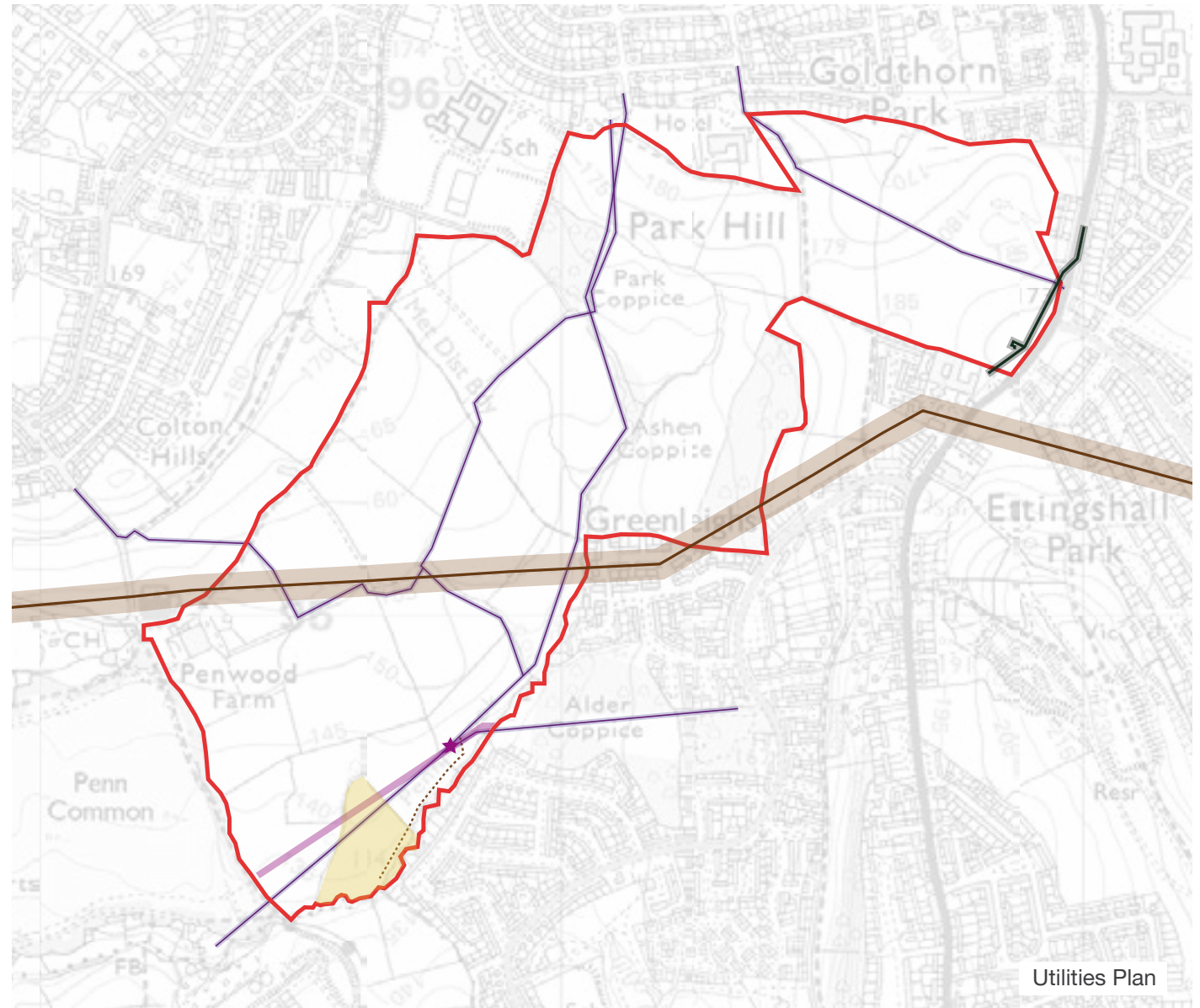
Utilities

2.17 There are a number of existing utilities easements which cross the site. These include overhead and underground power lines, public sewers, water pipes and a pumping station.

2.18 There is also an existing solar farm to the southern boundary.

KEY

-  Red line boundary
-  Overhead electricity lines with 30m easement
-  Water pipe route with 5m easement
-  Approximate water pump location and easement
-  Underground electricity lines
-  Existing solar farm
-  Public foul sewer with 5m easement



Utilities Plan

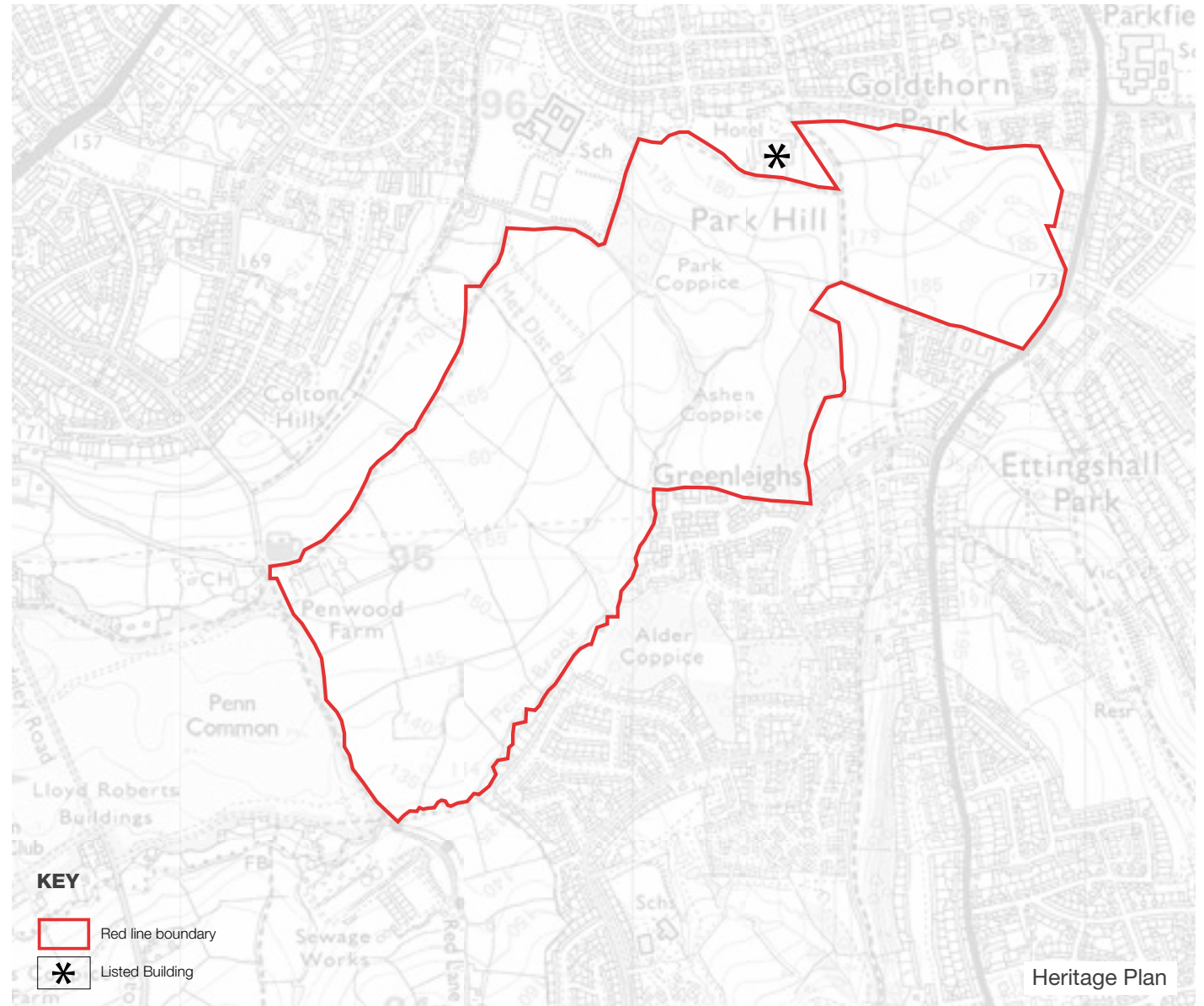
Heritage

2.19 A preliminary heritage assessment has been completed by Cotswold Archeology.

2.20 The Grade II Listed Building of Park Hall Hotel is situated c.70m north of the Site. The building dates to 1706 and was originally a house, later being used as a Roman Catholic School, and now as a hotel. Alterations and additions were made to the building throughout the 18th, 19th and 20th centuries. The building is of an early Georgian style, is of three storeys with a symmetrical 5-window range and with flanking two storey - three window ranges. To the west is a 20th century, eleven window extension. The buildings primary elevations face away from the site, but will still need to be taken into consideration when looking at development options at Pennwood.

2.21 Within the wider 1km study area there are ten Listed Buildings and two Scheduled Monuments. Seven of these Listed Buildings and the Scheduled Monuments are clustered c.800m to the north-west of the Site and include the Grade II* Church of St Bartholomew (NHLE: 1201886) and Six Grade II Listed structures associated with the Church.

2.22 Approximately 1km to the north of the Site lies the Chamberlain's Lane, Penn Common Conservation Area, designated by South Staffordshire District Council.



Access and Sustainability

2.23 A preliminary Highway and Transportation Technical Report has been undertaken by M-EC.

2.24 There are a host of Public Right-of-Way (PRoW) footpaths within the vicinity of Pennwood. There are two PRoWs which are located on the site: the first of these runs across the entirety of the western boundary of the site; the second is on the eastern side of the site and also extends along the majority of the northern boundary joining the first ProW outside of Colton Hills Community School. Both of these PRoWs provides access to local destinations including Gospel End, Goldthorn Park and Sedgley.

Facilities and amenities

2.25 Outlined on the plan opposite are some of the key amenities and facilities within walking/cycling distance of the proposed development. It is generally accepted that journeys on foot could be up to 2km and 5km for cycle journeys.

Cycle routes

2.26 A review of sustrans.org.uk highlights that there are no formal cycle routes within any of the immediate surrounding areas of Pennwood. However, there are a series of local routes which are a mix of smaller on-road routes as well as larger off-road traffic-free routes. Also located within close proximity is National Route 81 which connects Aberystwyth and Wolverhampton via Telford and Shrewsbury.

Public transport












2.27 Regular bus services operate within Penn, Goldthorn and Sedgley with stops close to the proposed development site. In Penn, service numbers 64 and 751 operate along Mount Road, at stops that are approximately 1.2km east of the proposed site centre. The 64 offers a regular service from Penn to Wolverhampton, Monday through Saturday on a mostly hourly basis. The 751 service is a school bus service which runs once each way Monday to Friday.

2.28 In Goldthorn the nearest bus stop is located 950m from the site centre and is serviced by only 1 bus, the 61 service. The 61 service, like the 64 service, operates Monday to Saturday on an hourly basis and connects the area to Wolverhampton.

2.29 Sedgley has the greatest number of bus services with the 27, 27A and 1 service all operating at the nearest stop to the site. A stop along Northway 1.27km away from the site centre is serviced by the 27 and 27A service. Whilst another stop 1.48km away from the site centre is serviced by the 1 service along Wolverhampton Road. The 27 and 27A both travel from Dudley to Wolverhampton Monday to Saturday on an hourly basis the only difference being that whilst the 27A operates throughout the day, the 27 is only in service during the evenings. The 1 service operates from Monday-Saturday between Dudley and Tettenhall Wood on a 10 minute frequency.

2.30 There are two train stations situated approximately 3.5km away from the site. The first being Wolverhampton Railway Station in the north managed by Virgin Trains, the second being Coseley Railway Station in the east managed by London Midland.

KEY

	Red line boundary
	Key Roads
	Railway
Facilities	
	Schools
	Medical / Health Care
	Shops / Local Services
	Public House / Social Clubs
	Green Space
	Public Open Space
	Golf Course
	Local Centre

Pedestrian Access Opportunities

2.31 The current access could be converted to a footway/cycleway link, doubling up as a form of emergency access.

2.32 An existing field access from the site is positioned at the end of a cul-de-sac on Ashen Close. Ashen Close, being a quiet residential area, would not be suitable as a vehicular access. But as a footway/cycleway link would provide a good link to Alder Coppice Primary School, Dormston School, public transport links and the facilities available in Sedgley.

2.33 The current site benefits from two further field accesses. These accesses, and the site frontage in the vicinity have been investigated as potential vehicular access points.

Vehicular Access Opportunities

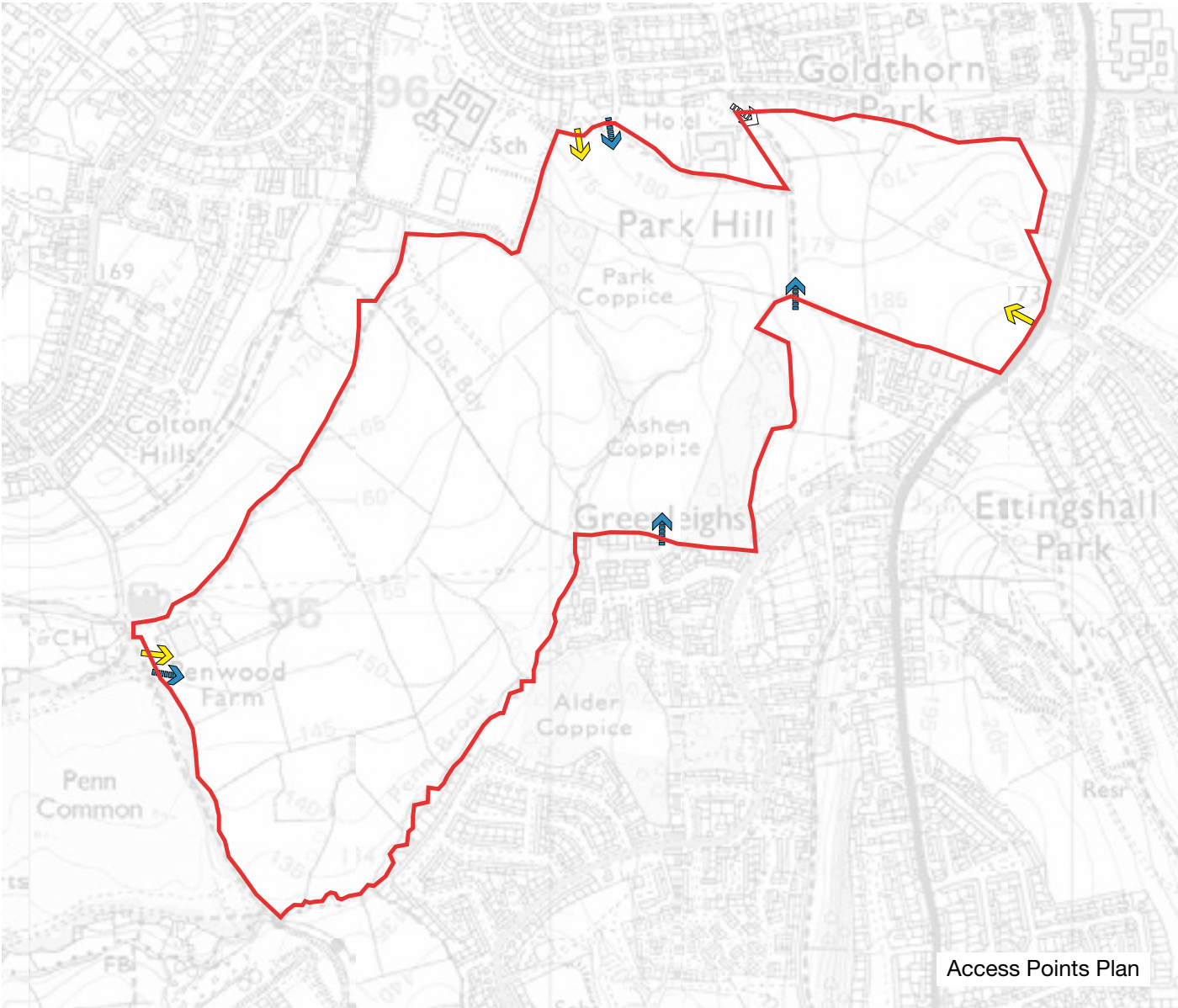
2.34 The primary access point to the site would be onto the A559 Wolverhampton Road, an access here would give the site direct access to the wider highway network. Further detailed work would need to be carried out to ascertain the form of the junction. It is likely, mainly due to the volume of traffic on the A559 that this junction will need to be a roundabout or traffic signal junction.

2.35 There is sufficient frontage to cater for a full access at this location, but, there could be benefit in linking the site access to the nearby Dovedale Road to incorporate some pedestrian facilities, across the A559. The new access will be designed with pedestrians and cyclists, forming a further sustainable transport access to the site and a connection to existing public transport opportunities.




2.36 Highways and Transportation Technical Guidance Note published by the City of Wolverhampton Council, Section 3 states that up to 400 houses can be served by a single access, although it does state not normally no more than 150 dwelling with sites to be considered on a site by site basis. As discussed above this site can provide a number of alternative emergency access points which provides a strong case for serving more than 150 houses off a single access.

2.37 A further point of access could be delivered off Jeremy Road. Adjacent to the current field access is a small dummy roundabout offering access to the school and a U-turn facility for other traffic. This island could be made bigger to form an access to the site. Although it would enter an existing residential area this access could provide a link to the A4039. An access in this area would also provide a direct link to the Colton Hills Community School

2.38 The site has a number of existing access points which can be utilised to provide pedestrian/cyclist only access and a primary and secondary all movements access. Additional transport work will be required to work up feasibility layouts of the potential access points, including the form of the vehicle accesses. With the information available at this stage the access strategy above, is deliverable with no major issues or constraints having been identified.



KEY

-  Red line boundary
-  Potential vehicular access point
-  Potential pedestrian access point

Access Points Plan

Constraints Summary

2.39 The baseline constraints of the site are summarised on the diagram opposite. They include:

Landscape designations

The site contains areas of Ancient Woodland (Penn Wood and Park Coppice); several TPO protected tree groups; a Site of Important to Nature Conservation (SINC); and a Site of Local Importance to Nature Conservation (SLINC). Maintaining these protected landscape features should be a consideration, and an offset is required to these features to provide protection. The site also has a Green Belt and Green Wedge designation.

Landscape Features

The site contains a number of mature hedgerows and trees, important to local landscape character. Penn Brook is also a key feature.

Topography and areas of visual sensitivity.

The site is undulating. The southern area of the site rises to the north western boundary (towards Penn) and falls toward the Penn Brook Valley. The northern area of the site is undulating with several elevated sections. Elevated areas within the site are visually sensitive from key views and prominent in the local landscape.

Areas of landscape quality

The southern part of the site has a strong rural character and is partly identified as being of high landscape quality and higher landscape sensitivity.

Utilities

There are a number of utilities which crossed the site. Further technical work is required to fully understand the easements and maintenance requirements of these services.

Public rights of way

There are a number of public rights of way which cross the site as indicated on the plan opposite.













Proximity of listed buildings

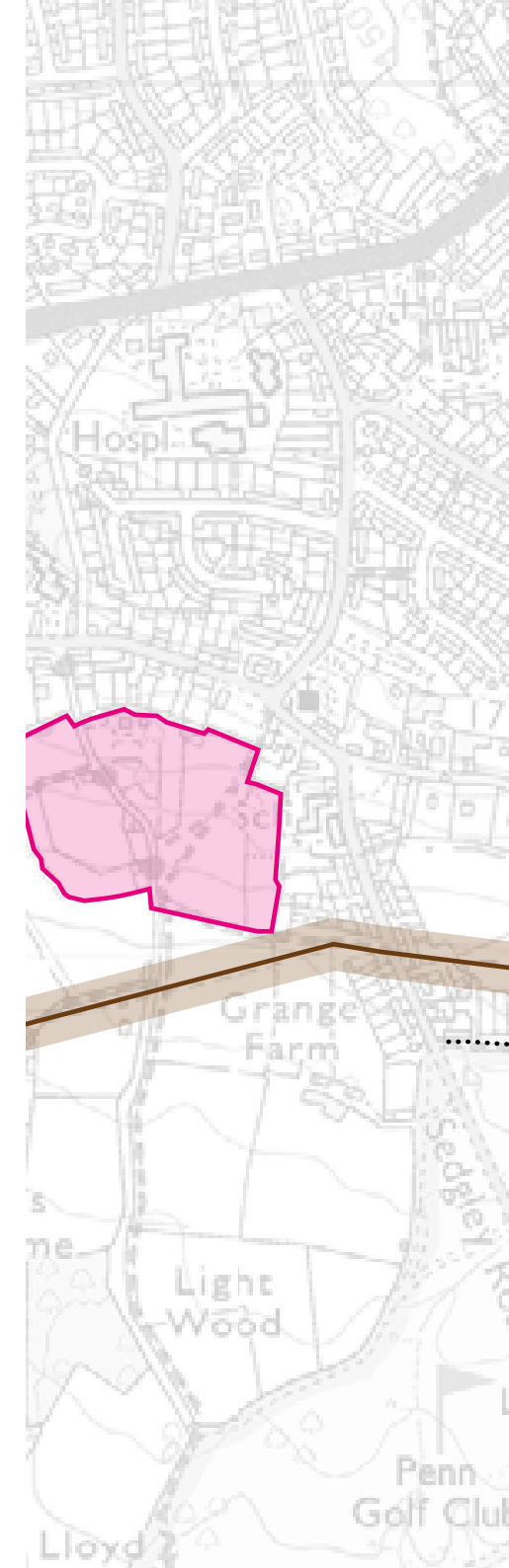
There is a Grade II listed building to the northern boundary of the site. Further technical work is required to understand its significance and setting,

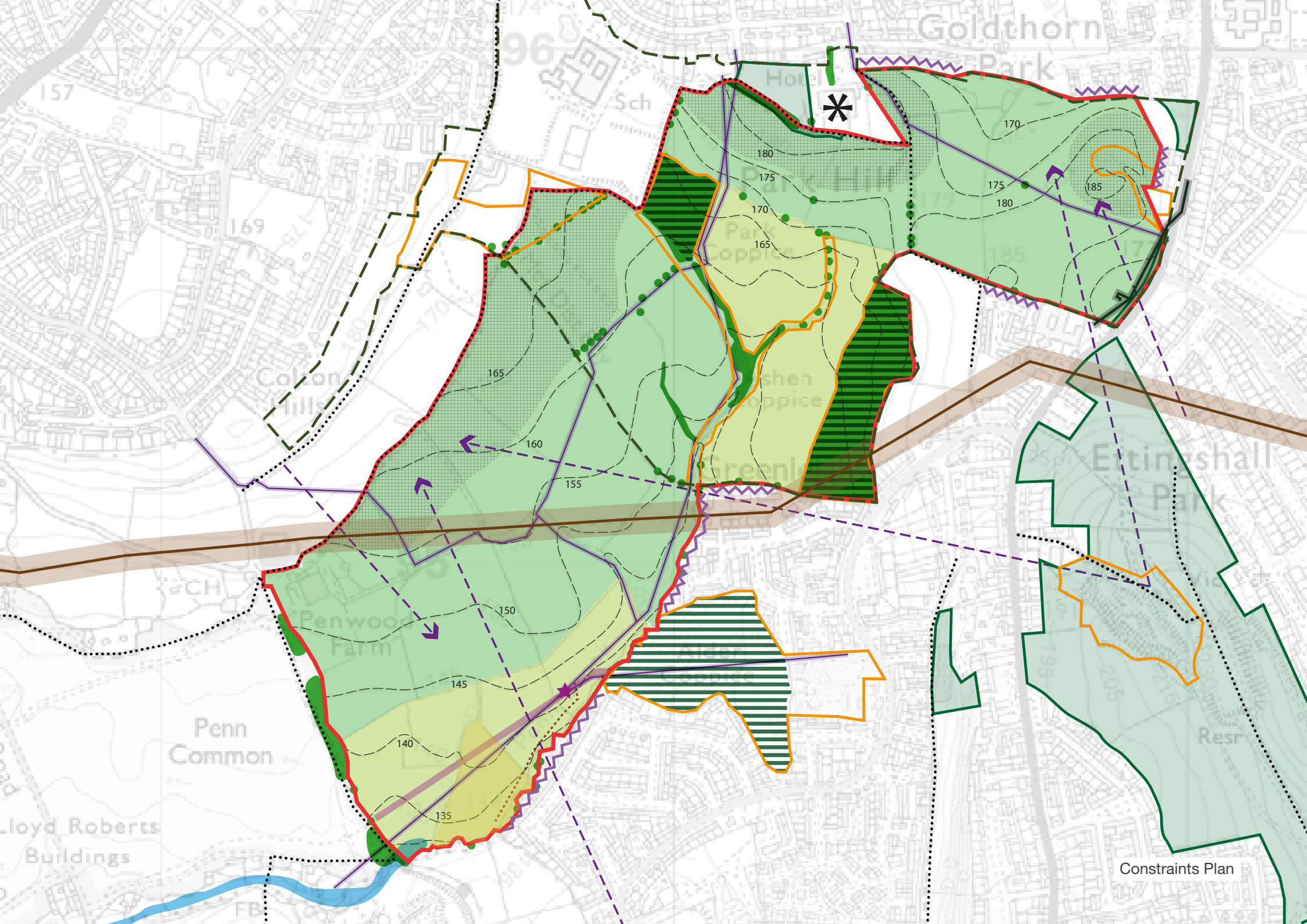
Relationship to neighbouring properties

The site lies adjacent to existing residential areas. Some properties directly back on to the site's boundary. Consideration to the privacy of these dwellings should be a consideration in developing the site.

KEY

	Red line boundary
	District boundary
	Areas of higher visual sensitivity
	Areas of lower visual sensitivity
	Area of high ground
	Ancient Woodland
	Tree Preservation Orders (TPOs)
	Sites of Importance to Nature Conservation (SINCs)
	Sites of Local Importance to Nature Conservation (SLINC)
	Goldthorn/Lower Penn Green wedge designation
	Canal Conservation Area
	Flood Zone 3
	Contours
	Overhead electricity lines with 30m easement
	Water pipe route with 5m easement
	Approximate water pump location and easement
	Underground electricity lines
	Key views into site
	Listed Building
	Existing solar farm
	Exposed backs of neighbouring existing properties
	Public Right of Way
	Public foul sewer with 5m easement





Constraints Plan

Development Opportunities

2.40 Having gained an understanding of the site's potential development constraints, it is now possible to understand the site's potential development opportunities in relation to the site characteristics. The adjacent plan shows the spatial distribution of these potential development opportunities, which begin to inform a responsive and appropriate development approach at Pennwood.

Opportunity to retain and enhance important landscape features

There is an opportunity to retain and enhance important landscape features in the development of the site, these include the retention of designated landscape assets such as Park Coppice, Penn Wood, Penn Brook and Ashen Coppice. The development proposals should strengthen ecological links between these features, connecting habitats. There is also the opportunity to incorporate open land within the public open space network, preserving their importance within the local landscape as visual breaks, whilst enhancing opportunities for public access in line with UDP policy relating to the Goldthorn/Lower Penn wedge. Other important landscape features such as protected trees and existing hedges present the opportunity to provide character and sense of place within the development.

Opportunity to provide accessible public open space

Potential to create substantial areas of public open space, open up access to the natural landscape by introducing a network of new footpath connections which tie into existing right of ways and opening up access to landscape features such as Penn Brook and the Park Hill Black Country Landscape Beacon which are currently inaccessible.
















Opportunity to sensitively accommodate development to serve the needs of the local community

The site offers the potential to accommodate residential development whilst maintaining a separation between the settlements of Penn and Ettingshall Park/Sedgley. Development can also be sensitively located in areas within the site that have the least visual sensitivity.

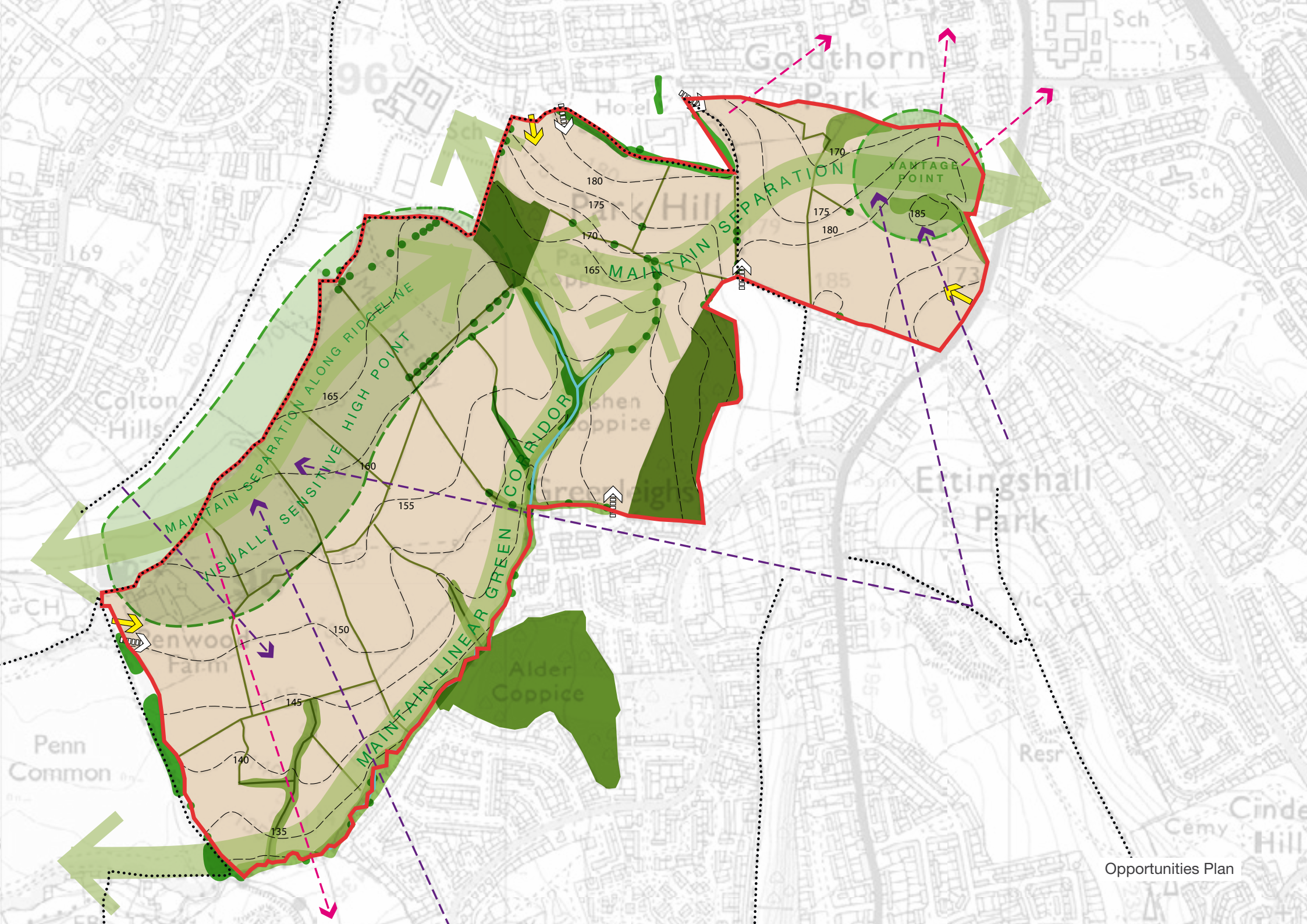
Opportunity to deliver new vehicular access points to serve the development of the site.

There is the potential to provide vehicular access to the site in a number of locations. These include points to the north at Jeremy Road, to the east at A559 Wolverhampton Road East and to the south-west off Pennwood Lane / Wakely Hill. A further emergency access could be provided at Ashen Close. There are also several opportunities to provide pedestrian links into the site.

KEY

-  Red line boundary
-  Area of trees - opportunity to retain
-  Woodland- opportunity to retain
-  Hedgerows - opportunity to maintain hedgerow network within development area to respond to historic field patterns
-  Penn Brook - opportunity to open up public access along the brook
-  Contours
-  Opportunity to reserve visually sensitive areas from development and protect key views into the site
-  Key views out of site
-  Views in to the site
-  Opportunity to create public open space at key vantage points
-  Public right of way
-  Potential vehicular access point
-  Potential pedestrian access point
-  Opportunity to link green spaces and create a green corridor
-  Opportunity for sensitive development informed by areas of lower landscape or visual sensitivity





MAINTAIN SEPARATION ALONG RIDGELINE
VISUALLY SENSITIVE HIGH POINT

MAINTAIN LINEAR GREEN CORRIDOR

MAINTAIN SEPARATION

VANTAGE POINT

Alder Coppice

Penn Common



A landscape view of a city skyline under a dramatic, cloudy sky. The foreground is a grassy field, and the middle ground is filled with dense trees and bushes. In the background, a city skyline is visible, featuring several tall buildings and a prominent spire. The sky is filled with dark, heavy clouds, with some light breaking through near the horizon.

03 Development Scenarios

Key Principles

3.1 Having established an understanding of the site's characteristics and surrounding development context, we propose a series of development principles which aim to ensure that the site is brought forward in a responsive, appropriate and viable way.

3.2 These principles establish the key criteria that any development at Pennwood should aim to achieve. The following Development Scenarios will be evaluated against the extent that they can deliver against these key principles.



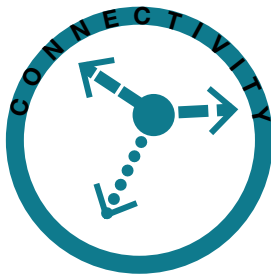
Respond To The Needs To The Local Community

Creating a development which respond to the needs of the local community in terms of delivering a range of new homes, community infrastructure and open space.



Create A Quality Landscape

Creating a development that responds to the key characteristics of the local landscape, strengthens and connects the green infrastructure network, preserves and enhances landscape features and creates new areas of public open space.



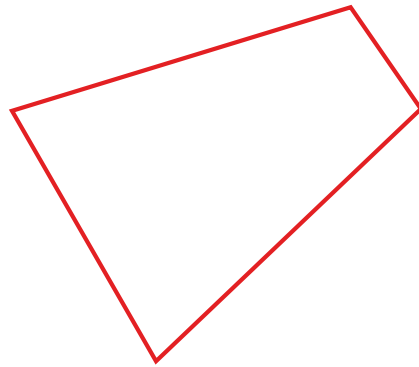
Ensure A Connected Environment

Relating development to the existing urban form and creating strong linkages into existing movement networks.

Development Scenarios

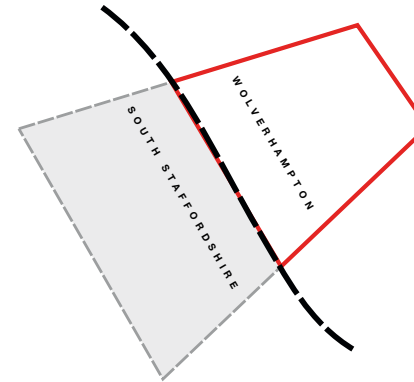
3.3 The site at Penwood is circa 115 Ha in size, and as such presents several different permeations of development form and quantum.

3.4 This document explores the development potential of 2 different scenarios:



Scenario 1

Extent of land available (whole site)



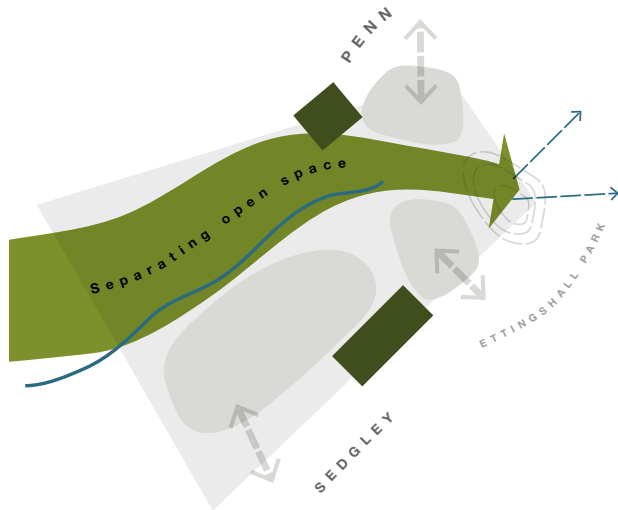
Scenario 2

Area solely within Wolverhampton City Council's administrative boundary (approximately half of the site)

3.5 Each of these scenarios have been explored individually, with the extent of the site's opportunities relating to the extent of intervention. Key elements of the proposals will also be flexible depending on the development scenario as their role and function within the development changes.

Scenario 1

Large intervention, maximum potential for community benefit



- Development area focused within the site to relate directly to the existing urban areas to the north, and east.
- Open space forms a linear landscape corridor running through the site, retaining a separating landscape feature between wider settlements.
- Elevated high ground retained as a key public open space within the development.

SCENARIO REVIEW AGAINST PRINCIPLES



- Delivery of circa 1300 new homes to meet the needs of people who live in the area and significantly help meet the needs of the Black Country.
- Provision for a mix of housing sizes, types and tenures including affordable housing.
- Provision of a range of supporting facilities to help foster a strong sense of community.
- Potential to open up large areas (circa 70 Ha) of previously inaccessible open space for local community.



- Physical and visual separation between the settlements of Sedgley and Penn maintained through the preservation of a green corridor with development directly relating to the urban area to the south of the site, and a small pocket of development accessed via Jeremy Road.
- Elevated areas of open land are incorporated within the public open space network, preserving their importance within the local landscape as visual breaks, whilst enhancing opportunities for public access in line with UDP policy relating to the Goldthorn/Lower Penn wedge.
- Sensitive or designated features of the landscape such as Park Coppice and Penn Wood are protected and provide a structure to assimilate built development within the wider landscape
- Development focused in areas of lower visual or landscape sensitivity.
- Potential to create substantial areas of public open space, open up access to the natural landscape by introducing a network of new footpath connections which tie into existing right of ways and opening up access to landscape features such as Penn Brook and the Park Hill Black Country Landscape Beacon which are currently inaccessible.
- A connected green infrastructure network which links sites of local importance for nature conservation and strengthens the hedgerow structure as a recognised important landscape characteristic.
- Development to the north is likely to be visible in views from the wider landscape including panoramic views from Ettingshall Park, but will be seen in context with existing development at a higher elevation, such as the Beacon Centre.



- Development focused in pockets which relate to the existing urban form, providing connections with development to the south from Wolverhampton Road and to the north off Jeremy Road.
- Enhancing pedestrian connections between residential areas; open space; and, the wider rural landscape to create a new sustainable neighbourhood.
- An urban form to promote community interaction, social inclusion and equity.
- New homes within walking and cycling distance of a wide range of employment opportunities.
- Southern development parcels have limited physical connectivity.
- A high degree of self-containment

KEY

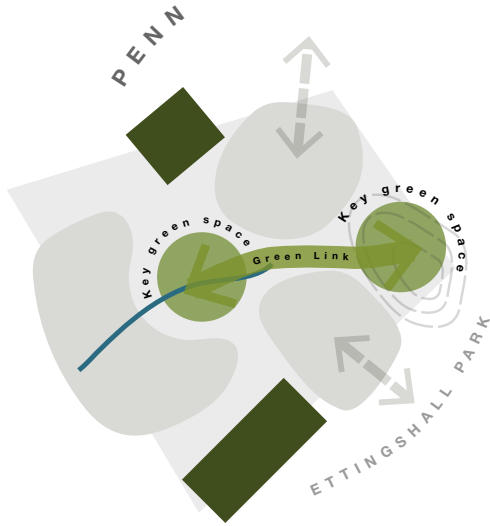
- Site boundary
- Existing area of woodland
- Existing trees (TPO)
- Existing hedges
- Existing Public Right of Way
- Proposed development area
- Primary access point
- Secondary access point
- Emergency/ped/cycle access point
- Pedestrian access point
- Proposed primary road network
- Proposed emergency access/Ped/cycle connection
- Proposed indicative footpaths
- Development area subject to highways capacity
- Proposed extension of primary road network subject to highways capacity
- Proposed green infrastructure
- Proposed key open space
- Proposed indicative planting
- Potential retention of solar farm
- Potential attenuation area



Development Scenario 1

Scenario 2

Medium intervention, a significant opportunity



- Development area focused towards the north of the site to relate directly to the existing urban areas to the north, and northeast.
- Development intensified around two key areas of public open space, which are connected via a landscape corridor.
- Elevated high ground retained as a key public open space within the development.

SCENARIO REVIEW AGAINST PRINCIPLES	
	<ul style="list-style-type: none"> • Delivery of circa 1000 new homes to meet the needs of people who live in the area and significantly help meet the needs of the Black Country. • Provision for a mix of housing sizes, types and tenures including affordable housing. • Provision of a range of supporting facilities to help foster a strong sense of community. • Potential to open up some areas (circa 35 Ha) of previously inaccessible open space for local community.
	<ul style="list-style-type: none"> • Undeveloped land to the south provides distinct physical and visual separation between the settlements of Sedgley and Penn, therefore the separation qualities of the internal linear green space can be reduced and development intensified. • Elevated areas of open land are retained as a feature incorporated within the public open space network, preserving their importance within the local landscape as visual breaks, whilst enhancing opportunities for public access in line with UDP policy relating to the Goldthorn/Lower Penn wedge. • Development is set back from elevated positions and focused in areas of lower landscape sensitivity. • Potential to create meaningful areas of public open space, open up access to the natural landscape by introducing a network of new footpath connections which tie into existing right of ways and offer opportunities to enjoy currently inaccessible vantage points. • A connected green infrastructure network which links designated landscape areas, strengthens the landscape framework and looks to integrate built development within the wider landscape. • A strong buffer is provided to the southern development edge that responds to existing green fingers branching from Penn Brook. • Development to the north is likely to be visible in views from the wider landscape including panoramic views from Ettingshall Park, but will be seen in context with existing development, such as the Beacon Centre.
	<ul style="list-style-type: none"> • Development relates to the existing urban area to the north and north east, with the opportunity to intensify development to maximise the development potential of the site. • Enhancing pedestrian connections between residential areas; open space; and, the wider rural landscape to create a sustainable neighbourhood. • An urban form to promote community interaction, social inclusion and equality. • New homes within walking and cycling distance of a wide range of employment opportunities.

KEY

- Site boundary
- Existing area of woodland
- Existing trees (TPO)
- Existing hedges
- Existing Public Right of Way
- Proposed development area
- Primary access point
- Secondary access point
- Emergency/ped/cycle access point
- Pedestrian access point
- Proposed primary road network
- Proposed emergency access/Ped/-cycle connection
- Proposed indicative footpaths
- Proposed green infrastructure
- Proposed central open space
- Proposed indicative planting
- Potential attenuation area



Development Scenario 2

04 Conclusions

The land at Pennwood presents an opportunity for sustainable growth.

4.1 This document demonstrates how development at Pennwood represents an opportunity for positive and beneficial growth.

4.2 The document has illustrated through a series of Development Scenarios that various different scales of development can successfully be accommodated within the site, each with their own merit. The site can therefore be deemed to be suitable, sustainable and viable with regard to delivering much needed family homes for the area.

4.3 This can become the starting point to a process of refinement and detailing, based on further assessment of potential constraints and technical feasibility.

4.4 We would be happy to engage further with the Wolverhampton City Council and South Staffordshire Council to discuss the merits of the Site and the development opportunity.



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