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Date: 11<sup>th</sup> August 2020

Dear Sirs,

Job Ref: RCA575b

**RE: Black Country Call for Sites July 2020 – Land at Blackhalve Lane, Wolverhampton**

This representation is submitted by RCA Regeneration Ltd (the agent) on behalf of St Phillips (the promoter) in respect of land at Blackhalve Lane, Wolverhampton (the site). In accordance with the preparation of the Black Country Plan, the Black Country Authorities are required to undertake a 'Call for Sites' exercise as a key component of the Strategic Housing and Economic Land Availability Assessment and the continuous process that feeds into the site assessment work to feed into the Local Plan Review.

Accompanying this representation, is a red line location plan which denotes the location of the site with a clearly marked boundary. The majority of the site lies within the South Staffordshire Council with the western part of the site falling within Wolverhampton City as defined on the local authority boundary map shown below at Figure 1.





Figure 1 - Location Plan

This greenfield site extends to approximately 4.93 hectares and is situated to the north-east of Wolverhampton. It is bounded by Blackhalve Lane to the south, Wood Hayes Road to the west, a small cluster of five residential properties to the south-western corner, and Oakley Farm immediately abutting the eastern boundary. The north, south and western boundaries are screened by mature hedgerows and trees. Within the site are a series of linear hedgerows which define the field boundaries into five compact pasture fields. These hedgerows include a number of mature trees that are a strong feature of the site. In addition, there is an existing field pond present in the middle of the site.

The site is located on Wolverhampton's urban-rural fringe on the boundary of the two suburbs known as Bushbury and Wood End, which make up a gateway to the wider South Staffordshire countryside. The site is considered to be highly sustainable, with a significant level of local shops, services and amenities situated within a short walking distance of the site.



The site is washed over by Green Belt, but is well contained by mature trees and hedgerows on the boundaries of the site and is in an urban fringe location on the edge of Wolverhampton. Existing development on the corner of Blackhalve Lane and Wood Hayes Road screens views of the site from this junction. The site is at its most visible in close proximity to the site from Blackhalve Lane and is generally screened from long distance views to the north, east and south by intervening vegetation. Views from public rights of way on higher ground to the north including Monarch Way are all within the context of the wider urban setting of Wolverhampton itself.

Submitted alongside this cover letter, is a Vision Document which has been prepared to accompany the promotion of the site for residential development. This Vision Document has also been submitted to South Staffordshire Council in response to their Issues and Options consultation undertaken at the latter part of 2019. Within the Vision Document is an assessment of the Green Belt. In summary, the site was considered against the five purposes of Green Belt as set out below:

- **To check the unrestricted sprawl of large built up areas** – The site is located in an urban fringe location on the edge of Wolverhampton. It is well contained within the landscape being screened from long distance views by intervening vegetation, hedgerows and trees. The site has mature hedgerows to its boundaries to the south, east and north with the western boundary of the site screened by Oakley Farm. Residential development at the corner of Blackhalve Lane and Wood Hayes Road also screens the site from this junction. This existing development to the east of Wood Hayes Road as well as the large complex of buildings at Oakley Farm and Electricity pylons given an urban fringe character to the site. The site (if removed from the Green Belt) therefore forms a logical extension to the urban area that does not create urban sprawl. An opportunity exists to improve the boundary to the Green Belt as existing residential development backing into the site does not have robust rear boundaries.
- **To prevent neighbouring towns merging into one another** – The Green Belt in this location does not have a strong function in preventing settlement coalescence. The nearest non-Green Belt settlement is some distance away, in Essington, where it is separated from the edge of Wolverhampton by a very narrow area of Green Belt, and where Sneyd Lane almost connects Ashmore Park with Essington in places. To the north is Featherstone, another smaller village that has also almost merged with the wider built up area of Wolverhampton. Beyond that lies the M54 and M6 Toll before reaching the larger town of Cannock. To some extent the merger of



surrounding villages has already occurred. The contained nature of this site and the retention of a significant green wedge between the site and Essington and a lack of intervisibility between the two will ensure that any perception of merging of settlements does not occur.

- **To assist in safeguarding the countryside from encroachment** – Most Green Belt sites will make a contribution to openness, but being made up of smaller land parcels, the site, as already explained, is well contained within the landscape by mature hedgerows and trees alongside existing development. Views of the site are only visible in close proximity and in certain locations not at all due to the height and nature of the boundary treatment. From long distance views, the site is not visible and is seen in the context of the wider built up area of Wolverhampton. It is proposed to retain key landscape features of the site including significant internal hedgerows and field trees. The development will also work with the natural topography of the site. Opportunities also exist to provide mitigation planting and ecological enhancements in line with the site landscape character.
- **To preserve the setting and special character of historic towns** – The site is on the edge of Wolverhampton but this fringe location is not within a Conservation Area, nor the setting of listed buildings or scheduled ancient monuments. The nearest Conservation Area is Bushbury Hill, approximately 1km to the east of the site. This is screened by intervening built form and is completely separate from the context of the site itself. The development of this site will not impact upon the special character of a historic town in that regard and does not contribute to it in this way.
- **To assist in the urban regeneration, by encouraging the recycling of derelict and other urban land** – Given the growth aspirations of the Black Country Authorities and the acknowledgement of the unmet need from the GBHMA, it is clear that Green Belt land must be released within the locality. The unmet need has been tested in various scenarios which look at increasing densities, releasing additional previously developed sites and sites in non Green Belt locations, and it is still subject to a significant shortfall.

Overall, this site performs fairly poorly when examined against the five purposes of the Green Belt as set out in the NPPF. All Green Belt sites will perform fairly well in terms of safeguarding the countryside because development will inevitably change the openness of the site. However, for a relatively modest loss of Green Belt land in this location, we consider that there are far more sensitive Green Belt sites in the City that contribute strongly to the other four purposes of the Green Belt.



The site is promoted for residential development of approximately 100 dwellings with an appropriate housing mix which will be informed by the Strategic Housing Market Assessment (SHMA). The proposals seek a residential use on the site of approximately 2.75 hectares; useable open space of approximately 1.79 hectares and a Locally Equipped Area of Play (LEAP). The accompanying Vision Document sets out the proposed masterplan for the area and should be seen as indicative at this stage.

A number of supporting technical assessments have already taken place to inform the development of these proposals. A full summary of these are available within the accompanying Vision Document, however, in summary consideration has been given to trees and arboriculture; flood risk and drainage; air quality; noise. An Agricultural Land Classification Assessment has been carried out for the site which determined that the site comprises of land of subgrade 3a across the majority of the site. Whilst this comprises best and most versatile agricultural land, the site poses a logical extension to the existing built up area of Wolverhampton and is capable of utilising existing amenities, services and infrastructure; which is preferable to the development of isolated areas of agricultural land elsewhere in the District. It is unlikely that the development of the site would conflict with the wider local agricultural interests of highly productive agriculture or horticulture and would therefore appear to be viable for residential development.

St Phillips Ltd (as the promoter) have been working with the landowners who are supportive of the promotion of the site for residential development and wish to see it released from the Green Belt and developed within the emerging Plan period.

I trust that the above and attached is sufficient and should you wish to discuss the contents of these representations, then please do not hesitate to contact us.

Yours sincerely



Victoria Lane MRTPI

Principal Planning Consultant

