

# South Staffordshire Local Plan Review Publication Plan (Regulation 19) Consultation

Dunston Garden Village

Representations on behalf of Rigby Estates LLP

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## Document Management.

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# 1. Executive Summary

- 1.1. Pegasus Group are promoting the land holdings of Rigby Estates LLP at Dunston, South Staffordshire. These representations, alongside previous representations by FWP and a supporting Masterplan, have demonstrated that the land at Dunston is an available, suitable and developable site which forms a logical location for a new settlement given its large single ownership, location outside the Green Belt, connections with the national road and rail networks and relative lack of other environmental constraints.
- 1.2. These representations are made in light of current national policy and guidance, based on the 2021 NPPF (and associated PPG guidance), with only limited weight given to the Levelling-up and Regeneration Bill (as amended) and associated Written Ministerial Statement dated 5<sup>th</sup> December 2022, as these suggested amendments have not yet been formalised or consulted on; whilst this Publication Plan was signed off for consultation and subsequent submission to the SoS at a Full Council meeting on 8<sup>th</sup> November 2022.
- 1.3. Dunston is the only new settlement option within South Staffordshire, which is not located within the Green Belt, and was identified within the GBHMA Strategic Growth Study as a location for the development of a new settlement. As far as we are aware it is the only new settlement option where a Masterplan and technical work has been progressed, as evidence in the attached Promotional Document (**Appendix 1**), earlier Vision Document (**Appendix 2**), and Rail Feasibility Evidence that confirms that the site could accommodate a new station.
- 1.4. Furthermore, Rigby Estates has now agreed terms with one of the UK's foremost PLC developers. This development partner has an unparalleled track record in delivering in the types of master development, residential development and commercial development work streams that will be necessary in successfully bringing forward a site of this scale in a fully comprehensive manner. Once appointed, the financial covenant strength and market leading capabilities of this development partner will provide much needed assurance that a new Garden Village at Dunston will be delivered. We will be in a position to name this partner by the time of the public examination – at which point the partner will take over stewardship of all planning promotion activities for the site.
- 1.5. The latest proposals suggest that the site is capable of accommodating between 3,000 and 6,000 homes, dependent on densities and whether adjacent land is allocated; along with 7.8 hectares of employment floorspace, 4 hectares of retail, leisure and community uses, a new school and a new railway station; within an attractive, walkable setting which generates real health and environmental benefits.
- 1.6. In respect of housing need, whilst not unsound, the baseline housing requirement should be increased, above and beyond the standard methodology figure, given that several of the circumstances that support elevated growth, as set out in the NPPG, are present in South Staffordshire, including wider economic growth strategies, committed infrastructure improvement projects, and significant unmet need in the wider area.
- 1.7. Furthermore, whilst the additional dwellings proposed to meet unmet needs in the wider GBHMA area are welcomed, the 4,000 figure itself is lacking in justification and does not go far enough given the acute and chronic level of unmet need combined with the local plan position and land constraints in neighbouring authorities.



- 1.8. Finally, we reiterate that the proposed development at this site fully aligns with paragraph 73 of the NPPF and the latest government guidance on Garden Communities in that it:
- Is a purpose built new settlement;
  - Provides a community with a clear identity and attractive environment;
  - Provides a mix of homes, including affordable, and the potential for self-build; and
  - Has the opportunity to be planned over a long period by the local authority and Rigby Estates in genuine collaboration with the local community.
- 1.9. In addition to housing it will also provide:
- Job opportunities within a large employment area and local centre;
  - Attractive green space and public realm areas throughout the site;
  - Transport infrastructure, including roads, buses and cycle routes, and a potential train station;
  - Community infrastructure, a school, with potential for other community, healthcare and energy uses; and
  - A plan for long-term stewardship of community assets, and renewable energy generation, to be developed in consultation with the Council.
- 1.10. Rigby Estates LLP (and our selected development partner) is committed to working collaboratively with the Council and Key Stakeholders to help the Borough deliver its housing and employment needs in a sensitive and sustainable manner, both within the existing Local Plan Review and any future review or additional DPD/SPD process required to deliver a new settlement.
- 1.11. We therefore respectfully request that the Council formally identify the Dunston site within the current plan for delivery beyond the plan period as required, with supporting investment from the landowner and their selected delivery partner, in line with paragraph 22 of the NPPF.
- 1.12. Whilst we support the plan as a whole and do not contest its overall soundness, Rigby Estates LLP wish to make specific comments on relevant policies through these representations and the upcoming process.
- 1.13. Set out below is a summary of the relevant planning policies we comment on in terms of their legal compliance, soundness, and duty to cooperate implications; and whether we wish to participate in the associated hearing sessions. This replicates the Council's own representation form and is intended to assist the Council and Inspector in succinctly identifying where we support or challenge the plan:

*Figure 1.1 – Local Plan Policy Comments/ Hearing Attendance Summary*

Local Plan Policy/ Paragraph	Nature of comment (legal compliance, soundness, duty to cooperate)	Suggested Modification	Intention to participate in relevant hearing session / reason
DS4: Development Needs	Policy is not positively prepared, justified and consistent with national policy as currently drafted and should be amended as suggested.	That overall housing requirements and buffers within the policy are reconsidered to ensure it is positively prepared, as per comments in section 5.	Yes – to speak to representations and discuss latest evidence on housing need at time of EIP
DS6: Spatial Strategy to 2039	Policy is not fully justified or consistent with national policy as currently drafted and should be amended as suggested.	That Dunston Garden Village should be identified now as the preferred location for a new settlement, as per comments in sections 3, 4 and 6.	Yes – to speak to representations and discuss strategy in light of latest supply and delivery evidence at time of EIP.
HC1: Housing Mix	Policy is not justified or effective as currently drafted and should be amended as suggested.	Increased flexibility and removal of 70% threshold for 3 bedrooms or less as per comments in paras 7.2–7.8.	Yes – to speak to representations and discuss in light of latest evidence at time of EIP.
HC2: Housing Density	Policy is not fully justified as currently drafted and should be amended as suggested.	Increased flexibility and removal of single density target as per comments in paras 7.9 – 7.12.	Yes – to speak to representations and discuss in light of latest evidence at time of EIP
HC3: Affordable Housing	Policy is not fully justified as currently drafted and should be amended as suggested	Increased flexibility on % requirement and tenure type, and more detail on any related SPD requirements, as per comments in paras 7.13 – 7.18.	Yes – to speak to representations and discuss in light of latest evidence at time of EIP.
HC4: Homes for Older People and Others with Special Housing Requirements	Policy is not fully justified as currently drafted and requires further evidence, otherwise it should be amended as suggested.	Removal of 100% M4(2) requirement as per comments in paras 7.19 – 7.23.	Yes – to speak to representations and discuss in light of latest evidence at time of EIP.
HC8: Self-build and Custom Housebuilding	Policy is not justified as currently drafted and should be amended as suggested above.	Increased flexibility and removal of blanket self-build requirement on all large sites as per comments in paras 7.24 – 7.28	Yes – to speak to representations and discuss in light of latest evidence at time of EIP.
HC10: Design Requirements	Policy is not effective or consistent with national policy as currently drafted and should be amended as suggested.	Additional detail added to criteria a and c, and criteria l can be removed, as per comments in paras 7.29–7.30.	Yes – to speak to representations and discuss in light of latest Design Guidance at time of EIP.
HC11: Protecting Amenity	Support policy.		No.



HC12: Space about Dwellings and Internal Space	Policy is neither justified nor consistent with national policy, and should be amended as suggested unless further evidence is provided.	Increased flexibility and removal of both NDSS internal standard requirement and external standards; as per comments in Paras 7.33 – 7.43.	Yes – to speak to representations and discuss in light of latest evidence at time of EiP.
HC13: Parking Provision	Policy is not consistent with national policy as currently drafted and should be amended as suggested.	Amend EV charging point requirement in line with Building Regs standard as per comments in paras 7.44 – 7.48.	Yes – to speak to representations and discuss in light of latest viability evidence at time of EiP,
HC14: Health Infrastructure	Policy is not justified as currently drafted and should be amended as suggested unless further evidence provided.	Increased acknowledgment of need for any contributions to comply with CIL Reg 122, as per comments in paras 7.49 – 7.51.	Yes – to speak to representations and discuss in light of latest evidence at time of EiP.
HC15: Education	Policy is not consistent with national policy as currently drafted and should be amended as suggested above.	Removal of blanket requirement for contributions and acknowledgment that these must comply with CIL Reg 122, as per comments in paras 7.52 – 7.53.	Yes – to speak to representations and discuss in light of latest evidence at time of EiP.
HC17: Open Space	Policy is not fully justified as currently drafted and should be amended as suggested.	Increased flexibility to allow open space and play equipment provision to be considered on a site-by-site basis, as per comments in paras 7.54–7.56.	Yes – to speak to representations and discuss in light of latest evidence at time of EiP.
HC19: Green Infrastructure	Policy is not consistent with national policy as currently drafted and should be amended as suggested.	Additional detail on tree lined streets to align with NPPF footnote 50 as per our comments in paras 7.57 – 7.59.	Yes – to speak to representations.
EC1: Sustainable Economic Growth	Policy is not unsound but could be improved with the amendments suggested.	Additional text to recognize locational requirements of logistics operators, as per comments in paras 7.60 – 7.63.	Yes – to speak to representations and discuss in light of latest evidence at time of EiP.
EC8: Retail	Policy is not unsound but could be improved with the amendments suggested.	Include reference that retail provision will be required within any new settlement and reviewed for potential inclusion as part of Retail Hierarchy, as per comments in paras 7.64–7.66,	No.
EC11: Infrastructure	Policy is considered sound subject to our comments.	As per comments in section 3 and 4 and paras 7.67 – 7.70.	Yes – to speak to representations and discuss in light of latest evidence at time of EiP.
EC12: Sustainable Transport	No issues of soundness with this policy.		Yes – to discuss sustainable transport opportunities in respect of Dunston.



NB1: Protecting, Enhancing and Expanding Natural Assets	Support policy.		No.
NB2: Biodiversity	Policy is not unsound but could be improved with the amendments suggested.	Increased flexibility around delivery of BNG in conjunction with open space as per comments in paras 7.75 – 7.78	Yes – to speak to representations and discuss in light of latest evidence at time of EiP.
NB3: Cannock Chase SAC	Support policy.		No.
NB4: Landscape Character	Support policy.		No.
NB6: Sustainable Construction	Policy is not justified or consistent with national policy as currently drafted and should be amended as suggested unless further evidence is provided.	Further evidence required to justify optional standards in line with NPPF & NPPG otherwise they should be removed, as per comments in paras 7.86- 7.100.	Yes – to speak to representations and discuss in light of latest evidence at time of EiP.
NB8: Protection and Enhancement of the Historic Environment and Heritage Assets	Support policy.		No.
Chapter 15: Monitoring	Generally supportive of the proposed framework but additional clarity requested.	Confirmation which policies are subject to monitoring and which are not, as per comments in paras 7.103 – 7.105.	Yes – to speak to representations and discuss monitoring issues.





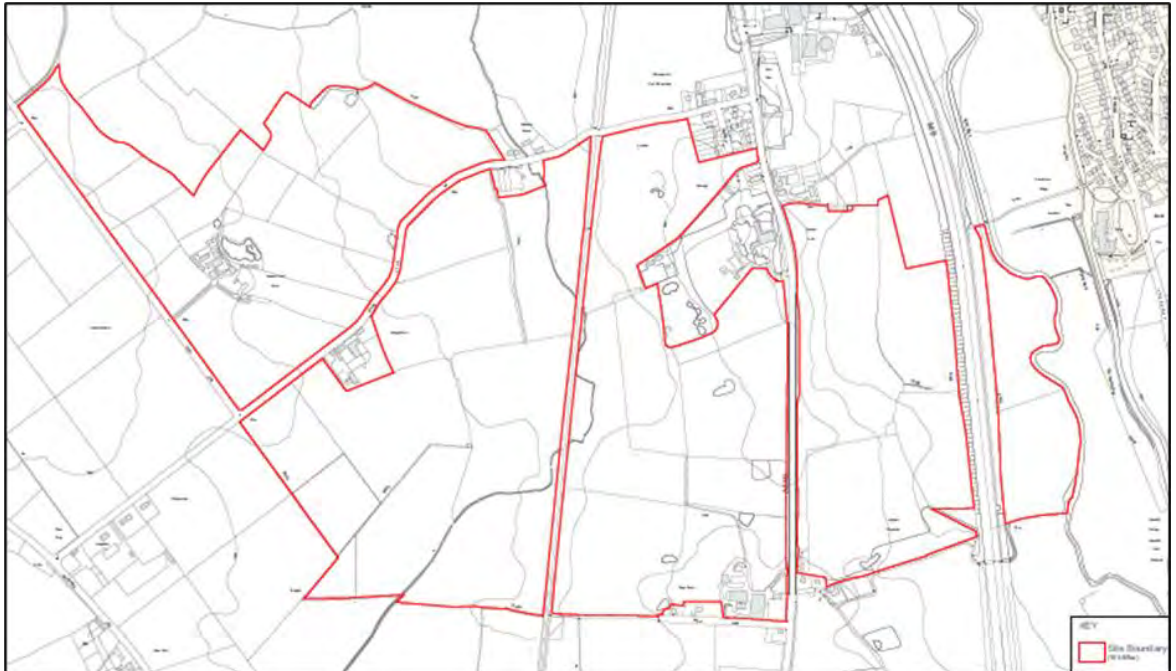
## 2. Introduction

- 2.1. Pegasus Group are instructed by Rigby Estates LLP to make representations to the South Staffordshire Local Plan Review Publication Plan consultation in relation to their land interests in Dunston. The consultation on the Publication Plan (Regulation 19) is taking place between 11<sup>th</sup> November until 23<sup>rd</sup> December 2022.
- 2.2. These should be read alongside previous submissions by FWP to the 'Preferred Options' consultation in December 2021 and 'Spatial Housing Strategy and Infrastructure' consultation in December 2019.
- 2.3. It is also pertinent that Rigby Estates LLP have now agreed terms with a large PLC developer who will deliver an integrated package of planning promotion, master development, residential development and commercial development services over the site – which will further boost the developability and deliverability of the site, guaranteeing both an end user and experienced delivery partner to ensure the supporting infrastructure is implemented in a timely fashion. We will be in a position to name the developer by the time of the examination.

### Rigby Estates Land Interests

- 2.4. Rigby Estates is a large private landowner with control of over 810 hectares of land across the UK, which is being used and promoted for a variety of uses including renewable energy generation, agriculture, residential and mixed use development.
- 2.5. Indeed, sustainable stewardship is a critical and defining value of the Estate, who have a significant history in optimising the land for the generation of clean, renewable energy including the delivery of solar farms, bio-mass plants and with a general focus on ensuring wider environmental benefits from all developments.
- 2.6. Rigby Estates are currently promoting the land known as the Dunston Estate Staffordshire – and will pass stewardship of this work over to their selected development partner once they are formally appointed in early 2023. The subject site comprises 160 hectares of agricultural fields set across two parcels, split by a railway line.
- 2.7. Further detail is set out in the Promotional Document attached at **Appendix 1** which suggests the site is capable of accommodating between 3,000 and 6,000 homes, dependant on densities and whether adjacent land is allocated alongside this site. This Promotional Document was also included as part of the previous representations submitted by FWP in 2021, but has been updated and reattached for consideration within the EiP process.
- 2.8. This follows a more detailed Vision Document submitted to the Spatial Growth Strategy consultation in December 2019 which we attach again at **Appendix 2**.

Figure 2.1 – Rigby Estates Ownership



## Historic Submissions

2.9. Details of this site have also been submitted previously to the following consultation processes through Pegasus Group and FWP:

- **Site Allocations Document Issues and Options (Reg 18) (May 2014)** – Pegasus Group made representations on behalf of the landowner and proposed a range of development options from small scale infill up to a new settlement across the full 160 hectare site, but the site was not taken forward for allocation, as overall development needs were lower at this point in time, with Dunston not proposed for any growth.
- **SHELAA 2018 (Site ref: O29)** – The previous 2014 submission for a new settlement was recorded in the 2018 SHELAA, with an amber score – ‘potentially suitable but subject to policy constraints – Open Countryside & Core Policy 1’, with an indicative capacity of 2,358 dwellings. The comments confirmed the basis for the assessment:

*“Agents submitted amended area to include a much larger tract of land which forms the Dunston Estate. Parts of site within Flood Zone 3 have been excluded from gross site area, as has the small parcel of the site to the east of the M6, as this is effectively severed from the rest of the site suggestion with no form of access across the M6 likely to be achievable. This leaves a remaining gross site area of approximately 123ha. The West Coast Mainline and Flood Zone 3 run through the centre of the parcel, which may affect future capacity further. Site considered potentially suitable as there is the potential capacity to realise a new settlement on the land. Site modelled at 32 dwellings per hectare.”*

- **Local Plan Spatial Housing Strategy and Infrastructure Delivery (October 2019)** – FWP made representations to this consultation to highlight the suitability of this site to deliver a new settlement, owing to its large single ownership, location outside the

Green Belt, connections with the national road and rail networks and relative lack of other environmental constraints. This submission included a comprehensive Vision Document (dated December 2019) which we attach again at Appendix 2 for clarity, and an illustrative Masterplan (at page 40) showing approximately 3,000 homes within Rigby Estates ownership. These representations also highlighted that the baseline OAN figure should be increased over and above the standard housing calculation figure.

- **Local Plan Review – Preferred Options (December 2021)** – Representations were submitted by FWP on behalf of the landowner, suggesting the site is capable of accommodating between 3,000–6,000 homes. Neither the Spatial Housing Strategy consultation (2019) nor the Preferred Options consultation (2021) identified a specific site within this area of search to deliver a new settlement. Instead, the Housing Topic Paper noted that a site to deliver a new settlement would be likely to come forward through future Local Plan Reviews. This was set out in draft policy DS4 (now DS6) which set out a longer-term aspiration for the Council to explore potential options for a sustainable independent settlement, which has the capacity to accommodate the future housing and economic needs of the district.

## National Policy Context

- 2.10. These representations are made in light of current national policy and guidance, based on the 2021 NPPF (and associated PPG guidance), with only limited weight given to the Levelling-up and Regeneration Bill (as amended) and associated Written Ministerial Statement dated 5<sup>th</sup> December 2022, as these suggested amendments have not yet been formalised or consulted on; whilst this Publication Plan was signed off for consultation and subsequent submission to the SoS at a Full Council meeting on 8<sup>th</sup> November 2022.

## Report Format

- 2.11. The remainder of this representation is set out as follows:
- In **Section 3** we introduce the Dunston Garden Village proposals;
  - In **Section 4** we critique the Council’s evidence base where it assesses the Dunston site (with reference to various supporting documents);
  - In **Section 5** we review the proposed housing requirement and needs within South Staffordshire and the wider Greater Birmingham Region (as per Policy DS4 and supporting paragraphs 5.8–5.17 in Chapter 5 of the plan);
  - In **Section 6** we consider the longer term aspirations for a new settlement beyond 2039, with Dunston Garden Village being within the area of search (as per Policy DS6 and supporting paragraph 5.66 in Chapter 5 of the plan);
  - In **Section 7** we consider the relevant Development Management policies (in Chapters 6–14 of the plan); and
  - In **Section 8** we provide a summary of our overall conclusions.

### 3. Introducing Dunston Garden Village

#### The Site

- 3.1. The site comprises over 160 hectares of open countryside which abuts the southern and western edge of the settlement of Dunston. The site is surrounded by open countryside to the north, west and south. To the east of the site is the River Penk and the Staffordshire and Worcestershire Canal. Beyond the eastern boundary is the settlement of Acton Trussell. The south western boundary is comprised of Long Lane and the southern boundary is made up of agricultural field boundaries, Swan Lane and a minor access road. The northern boundary is made up of School Lane and agricultural field boundaries.
- 3.2. This site is made up of undeveloped agricultural land which contains a number of farm buildings located both within the red line boundary of the site and on the edge of the site boundary. The existing development located along School Lane (ribbon residential development and farm buildings), Swan Lane (agricultural buildings) and the A449 (Bovis Homes offices) will be retained and incorporated into the proposed development of the site.
- 3.3. Pothooks Brook runs through the site, starting on the western side of the site and crossing under the West Coast Mainline to the eastern part of the site. There are a small number of existing ponds within the site boundary.
- 3.4. This land holding is dissected by a number of key infrastructure assets, including; the West Coast Mainline, the A449 and the M6 motorway. The West Coast Mainline runs north to south through the site and divides the Garden Village in half. School Lane forms part of the northern boundary of the site with a bridge crossing over the railway line. School Lane then runs in a south westerly direction and runs through the proposed Garden Village area. School Lane is the only existing made road within the site.
- 3.5. The A449 runs parallel with the West Coast Mainline but is located towards the eastern section of the site. The M6 also runs north to south through the eastern section of the site, resulting in a parcel which is bound by the River Penk and the M6 and somewhat isolated from the rest of the development.
- 3.6. The site comprises a mixture of Flood Zone 1, 2 and 3 land. The majority of the land holding is located within Flood Zone 1, with the Flood Zone 2 and 3 land located along the West Coast Mainline and to the south of School Lane. There are no Listed Buildings located within the red line boundary.
- 3.7. The site is not located within a Conservation Area or SSSI, but Cannock Chase (a Special Area of Conservation) is located 8km from Dunston Heath Farm, and therefore the landholding falls within the 15 km zone of influence. Having said that, this applies to the vast majority of land proposed for development within South Staffordshire.
- 3.8. In respect of agricultural land the majority of the site is Grade 3 dairy land, with 47% is Grade 3b, and 33% is within Grade 3a, with much of the remainder in Grade 4 (poor). As such the majority of the site is not best and most versatile agricultural land (BMV).
- 3.9. The entirety of the proposed Garden Village is within a single landholding, namely Rigby Estates LLP, and is being promoted by Pegasus Group and other supporting consultants to meet the future development needs of South Staffordshire.



## Surroundings

- 3.10. The land in the Dunston estate is located to the south of the existing village of Dunston. Dunston is a small village comprising of 271 inhabitants according to the latest estimate from the 2021 census, and 91 dwellings. The village comprises of a primary school (St Leonard's Church of England First School), Dunston Village Hall, Dunston St Leonard Church, Dunston House and the Bovis Regional Office.
- 3.11. The land is currently designated as open countryside **and is not located within the Green Belt**. This is a significant benefit of the site, considering that **approximately 80% of the district is made up of Green Belt land**, including the other sites proposed for a new settlement.
- 3.12. The existing settlement of Dunston is characterised by a mix of semi-detached and detached properties, including some single storey dwellings.
- 3.13. There are a several Grade II Listed Buildings in the settlement of Dunston including the Grade II Dunston Farmhouse, Grade II Dunston House, Grade II Church of St Leonard, Grade II Former Stable Block, albeit no higher grade buildings. There are also Scheduled Ancient Monuments at Moat House Farm Moated Site, just east of the site beyond the river Penk, and the Hay House Moated site approximately 750m west of the site.

## Accessibility

- 3.14. Dunston is located on the western side of the A449 trunk road, in close proximity to Junction 13 of the M6 motorway, and approximately 3km south of the urban area of Stafford and 5 km south of Stafford Town Centre.
- 3.15. The site is closer to the market town of Penkridge, approximately 3.5 km to the south, which has a wider retail and employment offer. Penkridge offers a range of services and facilities, including; cafés, pubs, restaurants, take-aways, market, library, sports centre, dentist, doctors' surgery, hotel etc. Penkridge also is well connected in terms of access to rail services. Penkridge rail station is on the Birmingham branch of the West Coast Mainline, with links to Wolverhampton, Birmingham, Stafford, Crewe, Liverpool Lime Street and London Euston. On weekdays, there are two trains per hour southbound and one northbound, with some additional services during the peak hours and an hourly service each way on Sundays.
- 3.16. Stafford has a population of over 70,000 residents as per the 2021 census (up from just over 68,000 in 2011) and is the County Town, with a higher level of services and facilities to those offered in Penkridge, including: leisure centres, hotels, casinos, hospitals, colleges as well as a larger range of national supermarkets and other multiple retailers. Stafford Railway Station is approximately 4.5km to the north which offers additional services to London, Manchester, Bristol, Reading and other destinations.
- 3.17. The majority of bus stops that are within the site are located along the A449, which cuts through the site parcels. Dunston Hall bus stop is served by the National Express no 54 which has hourly services to Wolverhampton and Stafford, whilst the Arriva no 75 provides hourly services to Cannock and Stafford.
- 3.18. In respect of the road network the site is directly adjacent to Junction 13 of the M6 and therefore has strong links with the national road network, whilst the A449 is one of the key



north/south routes through the district linking to Wolverhampton. As such, in strategic terms, the site has excellent accessibility to the national road network, with realistic opportunities to improve public transport infrastructure, as addressed later in this representation.

## The Vision

3.19. As set out in the Promotional document, **Rigby Estates are seeking to create a highly sustainable new community that delivers:**

- A vibrant and accessible community heart with a new train station, alongside retail, entertainment and community uses that create an immediate sense of place;
- 3,000 – 6000 new homes within walkable neighbourhoods that make best use of renewable energy and sustainable forms of construction;
- Around 8 Ha of complementary employment uses reducing travel to work distances and taking advantage of proximity to the M6;
- Significant enhanced green infrastructure through the heart of the settlement to provide an attractive setting that provides health and wellbeing benefits and bio-diversity net gain;
- The site is eminently deliverable, with multiple road frontages and direct access to the national rail network within one ownership; and
- Additional land ownerships to extend the settlement up to 6,000 homes to aid the delivery of key infrastructure should this be deemed beneficial.

3.20. As noted, the quantum of housing and employment provision is dependent on the level of density that can be achieved on site and whether adjacent land parcels are brought in and allocated alongside this site, with the majority of the surrounding land also considered suitable for allocation, particularly to the north and west towards the M6 junction, given this is also outside the Green Belt and has similar accessibility credentials and physical characteristics.

## The Proposed Development

3.21. The Masterplan shown in Figure 3.1 below (from page 4 of the Promotional Document at **Appendix 1**) represents the latest scheme for the Rigby Estates site, to demonstrate what can be achieved within this single, unique, ownership; notwithstanding the fact that there is potential for further expansion as noted above should this be required to meet the region's needs, or to deliver the required level of supporting infrastructure.



Figure 3.1 – Illustrative Masterplan



- **Residential:** developable area of 64.25 hectares, which could deliver up to 3,000 dwellings at varied densities, with higher density towards the train station and local centre and other facilities, and lower densities near the landscape sensitive areas at the rural fringe. A mix of densities will allow for different types of dwellings in term of size and tenure, which in turn will accommodate a variety of households. This will provide a hierarchy of dwellings from large, detached properties with big plots through to smaller terraced forms allowing for a variety in the proposed streetscape as seen within the local area. The homes will prioritise the use of localised district heating, renewable energy and sustainable construction opportunities.
- **Employment:** area of 7.8 hectares in the south east corner, separate from the main residential area and with direct connection to the A449. This will assist the sustainability of the settlement by offering employment opportunities within the development itself to reduce out commuting. Demand for such uses is expected to be particularly high within the Warehousing and Distribution sectors (Use Classes B2 and B8) due to its direct connection to the M6 and national road network.
- **New railway station:** with 2 platforms, a shelter and associated parking (measuring 1.5 hectares). This is proposed at the centre of the site connecting to the West Coast Mainline, between the existing stations at Stafford and Penkrige. This will further enhance the sustainability of the settlement by increasing access for job opportunities for the existing and future residents via sustainable modes of transport. This is one of the Council’s key aspirations for any new settlement in the borough, and there is a longer-term aspiration for the West Coast Mainline to support more localised rail services when HS2 is complete. An alternative park and ride facility could also be



provided for Stafford station, if Network Rail or other key stakeholders determine that a station here is not practicable.

- **Local Centre:** measuring 2 hectares is at the heart of the scheme, to serve both the new development and to provide additional community facilities for the area. The Local Centre will provide a range of local services and facilities, which could include shops, restaurants, public house, hairdressers etc., and potentially a GP surgery. A diverse mix of uses will contribute towards making this area an active and vibrant place throughout the day. It will also ensure that the Garden Village is self-sufficient and reduce residents need to travel to access day to day facilities. The Local Centre is positioned adjacent to the proposed primary school to maximise the use and accessibility of the Local Centre. It has also been positioned along a strategic cycle route, footpath corridor and public transport corridor giving the option for journeys to be made using sustainable modes of transport (walking/cycling) as opposed to by car.
- **Primary School:** Land for a one form entry primary school (measuring 1.5 hectares) is provided adjacent to the Local Centre at the heart of the site. The location of the Primary School, alongside the public transport routes and strategic cycle routes, will ensure there are sustainable transport options for future users. This location also integrates into the northern end of the green wedge that runs through the centre of the site. The school is located within 500m of a large proportion of the proposed residential housing, and directly adjacent to the higher density local centre residential area where it is envisaged there will be a higher proportion of homes suitable for young families.
- **Neighbourhood Centres:** Two further neighbourhood centres (measuring 2 hectares combined) are shown to the west of the site at the existing Dunston Heath Farm and to the south along the edge of the A449. The provision of smaller local centres will ensure there are local services and facilities within a walkable distance available to all residents within the Garden Village. The southern centre is proposed for roadside type retail and leisure uses (convenience store, coffee shop, public house); whilst the western centre is proposed as a small Business Village type development with Class E uses mixed uses.
- **Access:** The Garden Village has been designed to create a number of key internal access routes through the village. The access routes have been designed to be tree-lined boulevards with concentric design to maximise connectivity/ permeability through the site, which uphold key garden village principles, creating fully walkable neighbourhoods. The principal access routes will be via the existing School Lane which will be upgraded and a new east west route further south connecting both east and west parts of the development of the A449.
- **Open Space:** The masterplan shows the provision of generous areas of open space (over 35 hectares), which will be mainly located in the centre and east of the site. These areas of public open space will not only serve the development itself, but also the wider community, which would also reduce visitor pressure on the nearby Cannock Chase SAC. As shown in the masterplan, there are areas within the development (to the east of the M6 and to the west of the train line) which could also be used for ecological enhancement or mitigation to ensure significant biodiversity net gain, or for district heating/ renewable energy generation.



3.22. A full consultant team has been appointed to investigate a range of environmental and technical matters, with the following listed documents submitted alongside representations to the 2019 Spatial Growth Strategy Consultation, and reattached her for clarity:

- Landscape and Visual Appraisal – Pegasus Environment – **Appendix 3;**
- Flood Risk Appraisal – Weetwood – **Appendix 4;**
- Ecology Report – TEP – **Appendix 5;** and
- Rail Capacity Review – MDS Transmodal – **Appendix 6.**

### **National Policy on New Settlements**

3.23. Whilst it does not refer to Garden Villages specifically, paragraph 22 of the NPPF was expanded in July 2021 and represents a clear progression in how national government expect local authorities to consider and plan for new settlements and other larger scale developments across multiple plan periods. It states **(with recently added text in bold)**:

*‘Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. **Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.***

3.24. Paragraph 73 of the NPPF goes further to state:

*‘The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as **new settlements...** provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.’*

3.25. It then sets out five criteria for large scale developments which we address in turn:

- a) **Consider existing or planned infrastructure, the area’s economic potential and the scope for net environmental gains** – Dunston Garden Village proposes a new train station which is a key aspiration within this area of search, harnesses the economic potential of this area which already has a high level of self-containment in terms of travel to work patterns. Significant areas of open space and blue/green corridors are proposed throughout the site which offer real opportunities for environmental gain; whilst Rigby Estates track record in renewable energy projects and sustainable stewardship will ensure wider environmental benefits arise from the development.
- b) **Ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself** – Dunston Garden Village proposes a self-sufficient community



with residential, employment, commercial and community and recreation uses all within walking distance of each other and interlinked.

- c) **Set clear expectations for quality development and how this can be maintained (such as by following Garden City principles), and ensure that appropriate tools such as masterplans and design guides** – these representations along with the attached Promotional Document (and previous detailed Vision Document) fully uphold Garden Village principles.
- d) **Make a realistic assessment of likely rates of delivery (which could extend beyond the plan period)** – there is no expectation or reliance on delivery from this site within the emerging plan period, although this could well be accelerated given the single willing landowner, non-Green Belt status, relative lack of constraints, and the involvement of a national house/ master developer with a track record of driving delivery on large schemes such as this. As such the site could make a significant contribution to development needs within this plan period and beyond.
- e) **Consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size** – not applicable given site's location outside the Green Belt.

3.26. The Local Plan Review 'Publication Plan' consultation addresses this issue in Policy DS6 'Longer Term Growth Aspirations for a New Settlement,' within Part A: Context and development strategy, and we cover this in section 6 of this report.

3.27. However, the draft policy should be strengthened. As currently drafted, it proposes a wide area of search for a new settlement. It should make a bolder commitment from the Council to allocate a specific site to deliver the NPPFs aspiration to make this policy effective. Indeed, it follows that a site should be identified at the earliest opportunity to give both the developer and the council confidence that the site will be delivered and the developer confidence to invest in the delivery in the site. The land at Dunston is the only credible candidate site that:

- Meets all the criteria of NPPF paragraph 73 as noted above;
- Is the only new settlement option site that is located outside the Green Belt;
- Has a single willing landowner; and
- Is the only option where a full consultant team has been appointed, and where a detailed Masterplan and technical work have been submitted.

### **Garden Village Principles**

3.28. The Government's commitment to Garden Settlements has been demonstrated through the investment of significant sums of money in recent years, with 14 pilot Garden Village schemes announced in 2017, backed by £6 million of government funding. These schemes form part of a £69 million programme to deliver up to 16,000 homes per year from 2025, creating almost 200,000 jobs and boosting the economy.

3.29. This has been supported by various guidance setting out criteria for different sized Garden Settlements, with those over 10,000+ considered Garden Towns and those between 1,500 and 10,000 home considered Garden Villages, with the initial eligibility criteria noting that



such villages should be freestanding, rather than extensions to existing towns (albeit this document has now been archived).

3.30. To date the Garden Communities programme has total funding of £69 million, including £15 million of funding announced by the Housing Minister in May 2022. Further investment in recent years including £9 million to support 21 Garden Villages and Towns in February 2019, £3.7 million for 5 new Garden Towns announced on 25<sup>th</sup> March 2019, with a further £2.85 million pledged for a further 19 Garden Villages on 28<sup>th</sup> June 2019. The Garden Communities programme supports house building in 43 towns and villages from Cornwall to Carlisle and will deliver over 300,000 homes, up to 90,000 of which will be affordable

3.31. MCHLG published a Garden Village Prospectus in August 2018 setting out their concept, and this has been supplemented with a toolkit dated 27<sup>th</sup> September 2019, which includes the following checklist. Whilst this scheme has now close, we respond to the checklist below:

Garden Community Toolkit Criteria	Dunston Garden Village Response
1. Making a case for a garden community: To deliver a successful garden community you'll need long-term support, local leadership, partnership and financial backing.	These representations and associated Promotional Document make a strong case for a Garden Village at Dunston, confirming its feasibility and presenting a clear vision for the site.
2. Site feasibility: How to test if there are suitable, available and deliverable locations and sites for a garden community.	
3. Developing a vision: How to successfully guide the development by creating a clear vision for your garden community.	
4. Engagement: Engaging the local community and stakeholders can create a garden community plan with roots in the local context.	Rigby Estates have already engaged with the Local Authority and various Infrastructure stakeholders in working up the initial proposals, and will involve the local community as the plans develop.
5. Planning policy: Local Plan policies provide an important framework to guide development proposals and aid decision-making for garden communities.	Rigby Estates is fully engaged with the Local Plan process.
6. Planning permission: Information about how to develop a planning permission strategy for your garden community.	A planning application strategy will be developed if and when the site is identified in the Local Plan, with revised para 22 of the 2021 NPPF requiring Local Plans to provide firmer policy support for such developments,
7. Masterplanning and design: Masterplanning is integral to creating well-planned and designed garden communities.	The Promotional Document clearly sets out the design concept and vision behind the current masterplan, and this will evolve as the proposals develop further and as more detailed technical work is undertaken.
8. Innovative and integrated communities: How smart communities connect people to technology.	Rigby Estates will embrace any new technologies that can help connect and integrate the existing and future community in Dunston.

<p>9. Infrastructure; Delivering infrastructure can unlock development of a garden community and provide some of the building blocks for a successful new community.</p>	<p>The proposals include a new train station, primary school and other supporting infrastructure which will create a self-sufficient and sustainable community in Dunston, which could require additional adjacent land to be allocated.</p>
<p>10. Legacy: Information about creating long-term maintenance and management arrangements for your garden community.</p>	<p>Rigby Estates are a committed long term landowner, with a genuine commitment to sustainable stewardship to deliver a lasting positive legacy and environmental benefits for the site and local area.</p>
<p>11. Assessing the viability of your garden community. Find out about government guidance on viability and how to manage it in your planning process.</p>	<p>Initial assessments have not flagged up any viability concerns, as this is a strong market area, with high demand for a range of uses, but this will be continually monitored as the scheme evolves.</p>
<p>12. Land value capture and funding delivery: The process of capturing some of the increase in land value which comes from policy decisions, the granting of planning permission by local authorities, or as a consequence of new or improved, publicly funded infrastructure projects.</p>	<p>Rigby Estates will work with all relevant stakeholders to ensure that land value uplift is distributed in an equitable way and fund the required infrastructure; whilst the fact that the site is in one large ownership should eliminate any equalisation issues.</p>
<p>13. Delivery mechanisms: At an early stage in your project, you should explore the mechanisms and options available for delivery of your garden community.</p>	<p>Rigby Estates will work with their Housebuilder/ Master Developer partner and engage with all relevant stakeholders to ensure that suitable delivery mechanisms, governance and project management process are put in place as these proposals develop.</p>
<p>14. Governance: Governance creates good collaborative working and effective decision-making among public and private sector partners and stakeholders.</p>	
<p>15. Project management: Strong project management is needed to deliver a complex garden community on time and to ensure it delivers on expectations.</p>	

3.32. This demonstrates that Rigby Estates have already satisfied many of the steps set out in this toolkit with a commitment to work through the remaining, more detailed and delivery focused elements, as the plans evolve; whether this is through the Local Plan Review, any future review or additional DPD/SPD process required to deliver a new settlement.

## 4. Local Plan Evidence Base

- 4.1. Within this section of the representations, we review the evidence base documents which have been published in support of the Local Plan Review. We provide comments on each of the documents of relevance to the Rigby Estates landholdings in the Dunston area.

### Sustainability Appraisal October 2022

- 4.2. The Sustainability Appraisal (SA) presents an assessment of the likely sustainability impacts of proposals set out in the Local Plan Review. It also provides a summary of the alternatives considered during the preparation of the plan.

#### Reasonable Alternatives: Residential Distribution Options

- 4.3. The SA summarises the six options for residential distribution which were assessed within the Regulation 18 (I) SA. This included the option of a new freestanding settlement, which performed relatively well against the SA objectives<sup>1</sup>.

#### Reasonable Alternatives: Spatial Options

- 4.4. The SA summarises the seven spatial options for the broad distribution of new housing growth, which were assessed within the Regulation 18 (II) SA. This included the option of infrastructure-led development with a garden village area of search beyond the plan period. This was identified as the best performing option as the proposed development would be likely to result in the greatest positive impacts in terms of sustainability, in particular regarding access to education and employment<sup>2</sup>.

#### Reasonable Alternatives: Development Sites

- 4.5. The Regulation 18 (III) SA Report included an assessment of 317 reasonable alternative sites, identified by the Council against 12 criteria, including this site (O29a/O29)<sup>3</sup>. Below, we provide commentary on each of the scores for the site. It should be noted that the commentary refers to the post-mitigation assessment in the SA.

#### SA Objective 1 – Climate Change Mitigation

- 4.6. The site (O29a/O29) is assessed as 'uncertain'. It is worth noting that all sites within the SA have been scored the same as with all sites, it is entirely uncertain whether impacts would be positive or adverse.

#### SA Objective 2 – Climate Change Adaptation

- 4.7. Site O29, which refers to the majority of the land holding, is assessed as being 'neutral'. Of course, Dunston Garden Village has been designed to take into account the areas which are at risk of flooding. As shown in the masterplan, development has been directed away from the areas at highest risk of flooding and no development is proposed within Flood Zone 3.

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<sup>1</sup> Table N.5, SA Volume 1

<sup>2</sup> Para N42 – N44 and Table N.7, SA Volume 1

<sup>3</sup> Appendix G, SA Volume 3

With the inclusion of SUDS and flood risk measures, the site could be developed without causing an increase to the risk of flooding elsewhere and ensure that forthcoming development on site is not at risk of flooding.

- 4.8. Site O29a, which forms a small parcel within the land holding, is assessed as 'minor positive'.

SA Objective 3 – Biodiversity and Geodiversity

- 4.9. The site (O29a/O29) is assessed as 'neutral', as are all sites which have been assessed. Indeed, it will be a requirement of any development to provide ecological enhancement and biodiversity net gain in compliance with national policy and the policies in the plan.

- 4.10. This site could however be upgraded to 'minor or major positive', given that Dunston Garden Village will bring forward significant biodiversity benefits and new habitats. An ecological appraisal has been prepared in support of the site, which is reflected and accounted for in the masterplan. The masterplan highlights the opportunities to enhance biodiversity across the site through the additional planting and woodland management of key wildlife areas and corridors. The site will also create large recreational areas on site, along with pond and swales, other SUDS features woodland planting, scrub and grasslands to enhance wildlife. The site will also provide habitats and wildlife corridors through features such as native hedgerows and wildflower meadows.

- 4.11. The development of the site presents a significant opportunity to enhance the biodiversity within the site and provide a greater variety and quality of habitats and wildlife features than is currently present. As such, although there would be a loss of greenfield land, the improvement to biodiversity and habitats can only be seen as a positive to the development of the site.

SA Objective 4 – Landscape and Townscape

- 4.12. The site (O29a/O29) is assessed as 'minor negative'. Indeed, only a small number of sites perform any better and a large proportion perform worse.

- 4.13. It is also worth noting that a new settlement, such as that at Dunston Garden Village, will undoubtedly have some impact on existing settlements and this will be the case irrespective of the site chosen. To accommodate the housing numbers and growth required in South Staffordshire this cannot be entirely avoided.

- 4.14. It should therefore be noted that in terms of this site, it is not located within the Cannock Chase AONB which is a particularly sensitive location in landscape terms. Sites located to the north east of the district would be located within this area and therefore new development is less appropriate in this location.

- 4.15. This site is not Green Belt and therefore Green Belt boundaries would not need to be revised to accommodate the development of this site. The Green Belt covers over 80% of the district and therefore there are few places which are not Green Belt and which could accommodate a large scale development of this nature. This location is the most suitable location to accommodate a new settlement in South Staffordshire in Green Belt terms.

- 4.16. In terms of landscape, a landscape and visual statement has been prepared in support of the site. It concludes that although a development of this scale will inevitably have an impact on views, it is not within the Cannock Chase AONB or Green Belt. With the proposed mitigation

measures in place, in terms of setting the scheme within a framework of mature trees and woodland, the potential impact on the surrounding landscape character and visual receptors would be reduced. Visually, the site is relatively well contained, with views to the east and south limited.

- 4.17. In terms of mitigation, a strong buffer of planting around the site boundaries will limit the effect of the development on the character of the immediate surroundings and on the range of visual receptors. Development is proposed to be set back from boundaries to allow space for a strong tree buffer, that in time will create a good visual screen.
- 4.18. In conclusion, all large development will have some impact in landscape terms. In terms of this site, although there would be an initial impact, this would reduce over the lifespan of the development with the proposed mitigation measures in place.

#### SA Objective 5 – Pollution and Waste

- 4.19. The site (O29a/O29) is assessed as 'minor negative', as are most of the sites which have been assessed.
- 4.20. However, given the size, connectivity and level of services proposed at Dunston Garden Village it is likely that a large proportion of journeys will be undertaken on foot. The scheme also proposes a train station which offers another credible alternative to the car. As such, this development will be a self-sufficient community of walkable neighbourhoods, thus reducing the need to travel by car, whilst electric vehicle charging points will be a priority. This will reduce the potential air pollution resulting from the future development of the site.
- 4.21. As such, although some air pollution and waste will be created, the development will create a sustainable self-sufficient community which will reduce levels of pollution and waste.

#### SA Objective 6 – Natural Resources

- 4.22. The site (O29a/O29) is assessed as 'minor negative', as are most of the sites which have been assessed.
- 4.23. It is also worth noting that to address the housing needs of the borough, large scale development is required, which cannot be accommodated solely on brownfield land.

#### SA Objective 7 – Housing

- 4.25. The site (O29a/O29) is assessed as 'minor positive', as are all the sites which have been assessed.
- 4.26. We would however like to reiterate that Dunston Garden Village can deliver a very large housing scheme which would make a significant contribution to the housing supply within South Staffordshire and maintain a healthy housing land supply for a significant number of years, more so than other smaller scale housing sites, and as such should potentially be given a 'major positive' score to reflect this/ differentiate the site.

#### SA Objective 8 – Health and Wellbeing

- 4.27. The site (O29a/O29) is assessed as 'minor negative', as are all the sites which have been assessed.



4.28. We would however like to highlight that Dunston Garden Village would create a self-sufficient community, which prioritises health and well-being, where future residents can walk/cycle to work, home, local services and facilities. The scheme also proposed over 35 hectares of open space, providing an abundance of open space to facilitate healthy and active lifestyles. This will be to the benefit of future residents and promote health and well-being.

SA Objective 9 – Cultural Heritage

4.29. The site (O29a/O29) is assessed as 'neutral', as are all the sites which have been assessed.

4.30. Indeed, at Dunston Garden Village, any heritage concerns can be appropriately addressed through the design of the proposed development. The masterplan has been designed with heritage in mind and ensures that there is a sufficient stand-off from the development to the closest heritage assets, with key views and vistas maintained.

4.31. A heritage assessment has been prepared in support of the site which confirms that there are no Conservation Areas within or adjacent to the site, which will impact upon the proposed development. There are a number of Listed Buildings in close proximity to the site along with two Scheduled Ancient Monuments however these have been considered as part of the design of this scheme. The location of the proposed residential/ employment/ commercial elements have been carefully planned and designed so that they do not impact on the setting of the nearby heritage assets. To prevent any impact arising, landscape buffers have been proposed to provide screening.

4.32. As such, the scheme will ensure that all historical assets are protected.

SA Objective 10 – Transport and Accessibility

4.33. The site (O29a/O29) is assessed as 'minor negative', as are most of the sites which have been assessed.

4.34. This rating for Dunston Garden Village is entirely incorrect as it would be extremely accessible with good links to a variety of modes of transport.

4.35. The site benefits from existing transport links, including; bus stops along the A449, which provide hourly services to Wolverhampton, Stafford and Cannock. The site is located adjacent to junction 13 of the M6 and has strong links with the national road network. The A449 is one of the key north/south routes through the district linking to Wolverhampton. Furthermore, the site is located approx. 3.5km to the north of Penkridge, which has a rail station. Penkridge Rail Station is on the Birmingham branch of the West Coast Mainline, which links to Wolverhampton, Birmingham, Stafford, Crewe, Liverpool Lime Street and London Euston.

4.36. The proposed development will improve the sustainability of the site and access to sustainable modes of transport. As noted earlier, Dunston Garden Village will bring forward a range of services and facilities which will mean the settlement is self-sufficient. This development proposes to deliver; residential, employment, primary schools, a local centre and a neighbourhood centre. As such, future residents will not need to travel to access key services and facilities.

4.37. The development proposes extensive pedestrian and cycle links, bus services and a new railway station. The development will improve the accessibility of this site/location and



provide better access to transport infrastructure and services and therefore once the development is in place, the site would be extremely accessible, which would be a 'major positive'.

SA Objective 11 – Education

- 4.38. The site (O29a/O29) is assessed as 'minor negative'. This rating is incorrect.
- 4.39. There is an existing primary school located within the village of Dunston, which is in walking distance, and Dunston Garden Village proposes to deliver a one form entry primary school which will further increase the accessibility of education facilities to new and existing residents.
- 4.40. The nearest high school is located 3.6km to the north of the site (Stafford Manor High School). Specific guidance on the distances that children will walk to school is found in the July 2014 document, published by the Department for Education (DfE) entitled 'Home to School Travel and Transport'. This suggests that the maximum walking distance to schools is 4.8 km for children over the age of 8. On this basis, the proximity of the nearest High School is well within guideline distances.

SA Objective 12 – Economy and Employment

- 4.41. The site (O29a/O29) is assessed as 'minor negative', as are most of the sites which have been assessed. This rating is entirely incorrect.
- 4.42. The residents of Dunston Garden Village would have access to three small employment sites to the east, south and north of the site. Furthermore, and more importantly, Dunston Garden Village proposes to deliver 7.8 hectares of employment land in the south east corner of the site, with a direct connection to the A449. This employment area will have a major positive impact on the local economy and result in a net gain in employment floorspace across South Staffordshire.
- 4.43. Furthermore still, additional land to the north of the site could be brought forward for employment. This land has been assessed within the Employment Sites: Site Assessment Topic Paper (September 2021) and is found to perform relatively well for employment and has a clear advantage for distribution / logistics being close to Junction 13 of the M6 motorway. This land is also identified as being potentially suitable for employment in the SHELAA 2021.
- 4.44. Also, and unlike other sites, Dunston Garden Village would not result in the loss of employment floorspace. The proposed development will result in a net gain in employment floorspace within the district and therefore the site should be considered to have a positive impact for this objective.
- 4.45. Furthermore, Dunston is located on the western side of the A449 trunk road, in close proximity to Junction 13 of the M6 motorway. This provides links both north and south and therefore the site is well placed to become a new employment hub, with excellent access to existing employment sites.

### The Preferred Approach

- 4.46. The SA summarises the evaluation of development sites which were assessed within the Regulation 18 (III) SA. What is clear from the assessment of this site (O29a/O29) is that the reason for excluding this site from the plan at this current time is simply because the delivery of a new settlement within the current plan period is not preferable to the proposed approach<sup>4</sup>.
- 4.47. However, the settlement has not been identified at this stage. While we take no issue with this *per se*, the new settlement should be allowed to come forward during the current plan period, if evidence demonstrates that it is needed.
- 4.48. This site (O29a/O29) has been assessed in the SA, and whilst we do take issue with the assessment in part as set out above, clearly Dunston Garden Village can deliver a sustainable new settlement.

### SHELLA 2021 – Assessment of Housing Land

- 4.49. The site (Ref: O29) has been assessed as a freestanding new settlement. It has been recorded in the SHELLA 2021, with an amber score – ‘potentially suitable but subject to policy constraints – Open Countryside & Core Policy 1’, with an indicative capacity of 2,315 dwellings. The comments confirmed the basis for the assessment:

*‘Agents submitted amended area to include a much larger tract of land which forms the Dunston Estate. Parts of site within Flood Zone 3 have been excluded from gross site area, as has the small parcel of the site to the east of the M6, as this is effectively severed from the rest of the site suggestion with no form of access across the M6 likely to be achievable. This leaves a remaining gross site area of approximately 120ha. The West Coast Mainline and Flood Zone 3 run through the centre of the parcel, which may affect future capacity further. Site considered potentially suitable as there is the potential capacity to realise a new settlement on the land. Landowner also indicates that the site could accommodate a small site suggestion off School Lane, Dunston. Site modelled at 32 dwellings per hectare.’*

- 4.50. Five other sites were also considered as a freestanding new settlement in the SHELLA 2021, with one being discounted as unsuitable at this stage.

### Housing Site Selection Topic Paper (November 2022)

- 4.51. The Topic Paper considers four sites within the broad location of search for the new settlement. Of the four options considered this is the only site which **does not have major negative effects** due to Green Belt harm, being out with the Green Belt. Furthermore, this is the only site that we are aware of which has progressed with a Masterplan and technical work.
- 4.52. Whilst a new settlement has been dismissed as an alternative spatial strategy to the one taken in the plan, there are simply no reasons to dismiss Dunston Garden Village as the new

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<sup>4</sup> Appendix H, Page H80, SA

settlement, which could be named in the plan for delivery after the plan period, unless monitoring indicates that it is needed to come forward before then.

- 4.53. Given the reasons for dismissing a new settlement, as set out in the Topic Paper, we provide specific comments below in relation to this site.

### **Highways Issues**

- 4.54. The Topic Paper identifies that the Highways Authority have concerns with all sites considered for the new settlement, due to the feasibility of establishing multiple accesses and potential impacts on junctions in the surrounding highways network.

- 4.55. However, a Transport Strategy has been prepared which confirms that Dunston Garden Village can be delivered from a highway's perspective. The scheme provides the opportunity to serve the development via improving the existing School Lane junction with the A449. At this stage, it is considered that the form of the improved junction would be a right turn lane ghost island junction. A second primary access would also be provided to serve the proposed new Garden Village at the A449 located circa 700 metres to the south. At this stage, it is considered that the form of this junction would be a four-arm roundabout.

- 4.56. Options will be explored to provide a new spine road and railway bridge that crosses the West Coast Mainline leading from the new roundabout junction to improve the permeability of the site. The Transport Strategy concludes that Dunston Garden Village can be accommodated in highways terms and therefore highways should not be reason to disregard this site as a location for future growth.

### **Access to Services**

- 4.1. The Topic Paper identifies that all of the potential sites are either not directly adjacent to an existing settlement's higher order services and facilities or have poor access to them.

- 4.2. However, the proximity of the existing site to existing services and facilities is irrelevant when considering that Dunston Garden Village will deliver a range of new services and facilities on site to create a self-sufficient community. Dunston Garden Village will deliver; employment land, a potential new railway station, a local centre, two neighbourhood centres and a primary school.

### **Rail Opportunity**

- 4.3. Despite their proximity to the West Coast Main Line, the Topic Paper identifies that none of the submitted site suggestions are in a location with a recognised rail opportunity, nor have any of the proposals submitted evidence to demonstrate that a new rail link would be feasible within their land control.

- 4.4. However, the technical review of rail capacity, prepared by MDS Transmodal (and enclosed at Appendix 6), confirms that this site does provide the opportunity to deliver a new railway station and Rigby Estates will work with Network Rail and other relevant stakeholders to explore the feasibility further.

- 4.5. The review concludes that a new station, with two platforms and a shelter could be located anywhere along the section of track within the Rigby Estates landholding, as it is a straight section of track with sufficient stopping distances in both direction in relation to nearby

stations at Stafford and Penkridge. There is spare capacity and the revenue that could be achieved from the additional station would be sufficient to justify its construction and to fund the incremental additional rolling stock.

### **Scale**

- 4.6. The Topic Paper suggests that none of the potential site options are of sufficient size to deliver the scale of growth envisaged by the GBHMA Strategic Growth Study in this corridor, which also means that no site is likely to accommodate significant on-site facilities beyond local retail centres and primary/first education facilities.
- 4.7. It should therefore be noted that whilst these representations relate to the promotion of land within the ownership of Rigby Estates, with an indicative capacity of 3,000 dwellings, there is additional and potentially suitable land around the site (particularly to the north and west) which, when combined with increased densities could deliver up to 6,000 homes and additional infrastructure in this location, to help deliver the level of growth envisaged by the GBHMA Strategic Growth Study. Rigby Estates would like to work proactively with the Council and surrounding landowners to investigate the potential of assembling a larger site at Dunston.

### **Duty to Cooperate Paper 2022**

- 4.8. The paper sets out the duty to co-operate requirements, including the strategic issues to be addressed. This includes matters related to housing, employment, and the Cannock Chase SAC. We welcome a co-operative approach on cross boundary strategic issues.
- 4.9. It is set out in the paper that the GBHMA authorities are now in the process of agreeing a Statement of Common ground (SoCG) across the entire geography and related authorities to deliver a review of the GBHMA Strategic Growth Study to support the changing position on housing shortfalls across the housing market area.
- 4.10. It is our understanding that the SoCG has been drafted and is in the process of being signed off across the GBHMA. It will therefore be important to review this document as the Local Plan Review progresses, and any implications it may have on the housing requirement in South Staffordshire. We reserve the right to comment further on the SoCG as matters progress.

### **Historic Environment Site Assessment (Updated 2022)**

- 4.11. An initial Historic Environment Site Assessment II was prepared in December 2019, which included an assessment of site O29. This was followed by two further updates, which included an assessment of both sites: O29 and O29a. This assessment of the sites is reflected in the latest 2022 Historic Environment Site Assessment, which considers several additional sites unrelated to the land discussed within these representations. The report confirms that the development of both sites would not result in substantial harm.
- 4.12. The assessment rates the risk of harm in terms of Red, Amber and Green and assesses the direct impact and the indirect impacts on the nearby heritage assets. If a site is rated 'green', this means that no concerns have been identified, on current evidence, although archaeological mitigation measures may be required. If the site is rated 'amber', this means there are no significant effects which cannot be mitigated against.

- 4.13. Sites O29 and O29a are rated amber both for direct and indirect impacts. As noted in the earlier sections of these representations, there are a number of Listed Buildings in close proximity to the site along with 2 Scheduled Ancient Monuments however as noted within the Historic Environment Site Assessment and within the Heritage Assessment prepared in support of this site, any impact can be mitigated against through sensitive design and landscape screening.

## **South Staffordshire Landscape Sensitivity Assessment Addendum (August 2022)**

- 4.14. The Addendum includes a landscape sensitivity assessment for an additional site at Gailey Lea Farm. There are no updates to this assessment in relation to the land holdings of Rigby Estates.
- 4.15. FWP provided comments on the assessment as part of their representations to the Local Plan Spatial Housing Strategy and Infrastructure Delivery Document (October 2019). As such, we ask that the Council refers back to these representations for comments on this document and the Landscape and Visual Assessment which was prepared and submitted.

## **Cannock Chase SAC Mitigation Guidance 2022**

- 4.16. This guidance details how developments which produce a net increase in the number of homes within 15km of Cannock Chase SAC will be required to undertake a Habitats Regulations Assessment (HRA) or make a financial contribution before development takes place. The land holdings of Rigby Estates at Dunston lie within this identified 15km boundary.
- 4.17. Pegasus welcome confirmation that the previously suggested approach of offsite Suitable Alternative Natural Greenspaces (SANGs), is not being pursued at this time. This is detailed within section 1.4 of the guidance.
- 4.18. In terms of the contributions required, South Staffordshire Council will require a payment of £290.58 for each net new home created through development within 15km of Cannock Chase SAC to be secured via a S106 Agreement. This is based upon a percentage of housing numbers proposed within 15km of the SAC from April 2022 in conjunction with other authorities to meet the total cost of £6,297,104. We wish to emphasise this level of contribution should be monitored in line with proposed housing numbers going forward to ensure contributions accurately reflect the housing levels proposed within South Staffordshire and other Local Authorities within the 15km zone.

## **SAC Partnership Memorandum of Understanding 2022**

- 4.19. This Memorandum of Understanding (MOU) sets out how the Cannock Chase SAC Partnership will take responsibility for a programme of measures to mitigate for the impact residential development has upon the Cannock Chase SAC, including the review, preparation and implement common plans and policies to protect the Cannock Chase SAC.
- 4.20. The MOU mirrors the contributions required within the Cannock Chase SAC Mitigation Guidance 2022. We do not seek to make further comments other than those noted on the above guidance document.



## Sustainable Construction and Renewable Energy 2022

- 4.21. The Topic Paper sets out a number of recommendations for sustainable construction measures above building regulations. These include Require 19% reduction in emissions vs 2013 Building Regulations Part L, with a note added that this recommendation has now been superseded by more recent 2022 changes to Building Regulations.
- 4.22. This approach is unnecessary and repetitious of 2021 Part L Interim Uplift and the Future Homes Standard. It is the Government's intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council does not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.
- 4.23. The Topic Paper also sets out a target of 110 litres per day person water target within new developments. Whilst we support efforts to reduce water usage, the Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The Optional Technical Housing Standard is 110 litres per day per person. As set out in details under the assessment of Policy NB6, a policy requirement for the optional water efficiency standard must be justified by credible and robust evidence as per the NPPF. This evidence has not been provided as part of Topic Paper.

## 5. Housing Needs (Policy DS4 – Chapter 5)

- 5.1. Policy DS4 and supporting paragraphs 5.8–5.17 consider the districts housing needs. The total housing requirement is now **9,089** over the 21 year period from 2018 to 2039 which equates to **433 dwellings per annum**. This total requirement has increased slightly since the 2021 Preferred Options requirement of 8,881, however it covers an additional year, with the annual requirement reducing from 444 dpa.
- 5.2. Within this figure, the underlying Standard Method requirement has reduced slightly from 243 dpa in 2021 to **241 dpa** in 2022<sup>5</sup>, whilst completions totalling 992 across the period 2018–2022 have been deducted. The total still includes a 4,000 dwelling apportionment to support the delivery of unmet need in the Greater Birmingham Housing Market Area (GBHMA).

*Figure 5.1 – Overall Housing Requirements*

South Staffordshire’s own housing need using the government’s standard method (2022-2039)	4,097
Completions in the district since the start of the plan period (2018-2022)	992
Additional housing to contribute towards the unmet needs of the GBBCHMA	4,000
<b>Total number of dwellings to be planned for</b>	<b>9,089</b>

- 5.3. Whilst the proposed figure exceeds the minimum starting point of the standard method, and may therefore not be technically unsound; there are a number of factors at play in South Staffordshire, and the wider Greater Birmingham Region that would justify an increase to this figure, to ensure a positively prepared plan in line with paragraph 35 of the 2021 NPPF. We outline these factors below, with reference to the current national guidance. These representations build upon those submitted to the Preferred Options in November 2021, providing additional evidence from the Council’s evidence base and other relevant documentation.

### National Guidance on Housing Need

- 5.4. In terms of national policy, NPPF Paragraph 61 states that (our emphasis):

*‘To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.’*

<sup>5</sup> As of March 2022, using the 2014 SNHP over the period 2022 – 2032 with 2021 affordability ratios.



- 5.5. Paragraph 11 also notes that for plan-making, the presumption in favour of sustainable development means that *'all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure...'*
- 5.6. As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. This is supplemented with additional detail in the NPPG<sup>6</sup>, which states that the Local Housing Need (LHN) provides a minimum starting point in determining the number of homes needed, it also states that government is committed to ensuring that more homes are built and that government support ambitious authorities who want to plan for growth.
- 5.7. This paragraph then sets out the circumstances when it might be appropriate to plan for a higher housing need than the Standard Method indicates, including:
- Where there are deliverable growth strategies for the area (e.g. Housing Deals);
  - Where there are strategic infrastructure improvements that are likely to drive an increase in the homes needed locally,
  - Where an authority has agreed to take on unmet need from neighbouring authorities, or
  - Where previous levels of housing delivery or assessments of need are significantly greater than the Standard Method.
- 5.8. In addition, paragraph 2a-015-20190220 confirms that:
- 'Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the Standard Method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.'*
- 5.9. Whilst South Staffordshire are proposing an approach that exceeds the minimum requirement, this doesn't reflect the circumstances in South Staffordshire and the wider Greater Birmingham area (as referenced in paragraph 10 of the PPG), or the demographic trends or market signals (as referenced in paragraph 15 of the PPG). As such, a far greater uplift is required.

## Meeting South Staffordshire Needs

- 5.10. In line with the guidance above, we set out the relevant circumstances that would support an uplift to the standard methodology for meeting South Staffordshire's own needs (before moving on to meeting unmet need in the wider region, other market signals, and supply side considerations). While the current housing figures and need may not be unsound, there is scope to deliver further housing in South Staffordshire to meet its own need and unmet need in the wider region.

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<sup>6</sup> Paragraph 2a-010-20201216



## Growth Strategies

- 5.11. PPG guidance notes how there may be justification to exceed the standard method figure if there are growth strategies in the area, for example where funding is in place to promote and facilitate additional growth. As summarised below, there are economic growth strategies in the South Staffordshire area which justify the standard housing method being exceeded in the district. These findings reflect our 2021 preferred options representations.
- 5.12. Firstly, South Staffordshire is part of the Stoke-on-Trent and Staffordshire Growth Deal, which was agreed by Government in March 2014. The Stoke-on-Trent and Staffordshire Local Enterprise Partnership (LEP) has secured £121m to support economic growth in the area from 3 Growth Deals (2014, 2015 and 2016), with £14.1m of funding committed between 2016 and 2021. Furthermore, the substantial investment from Government is expected to generate at least £19m of additional investment from local partners and the private sector, creating a total new investment package of £101.3m for the Stoke-on-Trent and Staffordshire area.
- 5.13. In addition, the Stoke-on-Trent & Staffordshire Strategic Economic Plan (April 2018) outlines strategic employment sites that are identified as priorities in the LEP area, which includes the Bericote Four Ashes and Featherstone sites which are both located in South Staffordshire District. Both sites will clearly generate significant jobs in South Staffordshire, which will in turn increase housing demand in the area. Indeed, the Four Ashes site will provide 900,000 sq ft of industrial floor space and accommodate over 1,000 jobs, and has outline planning consent in place. Since then the West Midlands Interchange has gained consent through the DCO process, which will generate further jobs growth, which we discuss below.
- 5.14. Finally, the Stoke-on-Trent and Staffordshire LEP now has a Local Industrial Strategy in place, which was adopted in March 2020 (so since the last draft of the local plan). This aims to boost investment in the area by focussing on the following strengths, and needs to be taken into consideration when establishing the housing need requirement for the District:
- Manufacturing and materials innovation;
  - Energy innovation and low carbon adoption;
  - Connectivity; and
  - A strong and growing visitor economy.
- 5.15. To conclude, the aforementioned economic growth strategies provide justification for exceeding the minimum standard method housing figure in the South Staffordshire context.

## Strategic Infrastructure Improvements

- 5.16. PPG Guidance also outlines how strategic infrastructure improvements that are likely to drive an increase in the homes needed locally provide justification for exceeding the standard housing method figure. Our previous representations (see Appendix 6) set out the infrastructure improvements and projects which need to be taken into consideration when establishing South Staffordshire's housing requirement, and these are still considered of relevance here.

- 5.17. As part of the Publication Plan consultation, the Council have published an updated Infrastructure Delivery Plan (2022). Whilst a number of the infrastructure projects in the plan relate to education, additional car parking provision etc, others are transport related such as road infrastructure improvements to help deliver the ROF Featherstone Strategic Employment site, and upgrades to Gailey Island associated with WMI. We have already outlined the economic growth benefits that will arise from the strategic employment sites, with the planned highways infrastructure helping to unlock their potential.
- 5.18. Table 6.1 of the South Staffordshire District Integrated Transport Strategy (October 2017) outlines potential and planned infrastructure projects in the District. Notably, Landywood Railway Station features in the Plan, including the 'Landywood rail station gateway project' and the aim to provide earlier and later trains and a half-hourly off-peak service from Landywood (which has now been achieved).
- 5.19. At a more strategic level, HS2 is clearly a key infrastructure project with a proposed new station in Stafford to the north. Phase 2a of HS2 was approved by Parliament in 2021, connecting Birmingham with Crewe. South Staffordshire District borders Stafford District to the north, therefore there will be evident economic growth benefits for South Staffordshire arising from the proposals<sup>7</sup>. For example, spurred on by HS2 connectivity at Stafford, Stoke and Macclesfield, the 'Cheshire & Staffordshire HS2 Growth Strategy' aims to deliver 100,000 new homes and 120,000 new jobs by 2040.
- 5.20. South Staffordshire is also likely to see significant benefits arising from the development of the West Midlands Interchange (WMI) which represents a strategic infrastructure project that achieved consent through the DCO process in May 2020. Once complete, the Interchange is expected to deliver up to 8 million sq ft of logistics floorspace and support around 8,500 jobs and given its location, it is reasonable to expected a good proportion of these to be taken by South Staffordshire residents – either existing or new people attracted to the area by new employment opportunities.
- 5.21. Finally, Highways England granted a DCO in April 2022 for a new Link Road between the M6 and M54, to reduce pressure on the A460, at an estimated cost of £779m, and this clearly represents a significant piece of strategic infrastructure that will support additional growth in the future. Work on this scheme is set to commence in 2023.
- 5.22. Therefore, the above infrastructure improvements and projects need to be taken into consideration when establishing South Staffordshire's housing requirement.

## Previous Delivery

- 5.23. Previous delivery had been broadly in line with the Standard Method figure of 241 for the majority of the last 20 years, however the year 2021/2022 saw elevated delivery of 530 dwellings which has increased the average delivery to 265 dpa since 2001 and 284 over the Core Strategy period (2014/15–2021/22)<sup>8</sup>, which is 10–18% higher than the requirement. What's more the Council's latest 'Housing Monitoring and Five Year Housing Land Supply' document, dated April 2021, projects delivery at an average 363 dpa from 2021 – 2026,

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<sup>7</sup> <https://www.hs2.org.uk/why/connectivity/>

<sup>8</sup> According to government live table 122.



indicating that the 2021/2022 figure was not an anomaly and that delivery is trending upwards, which might support an uplift in the requirement in the coming years.

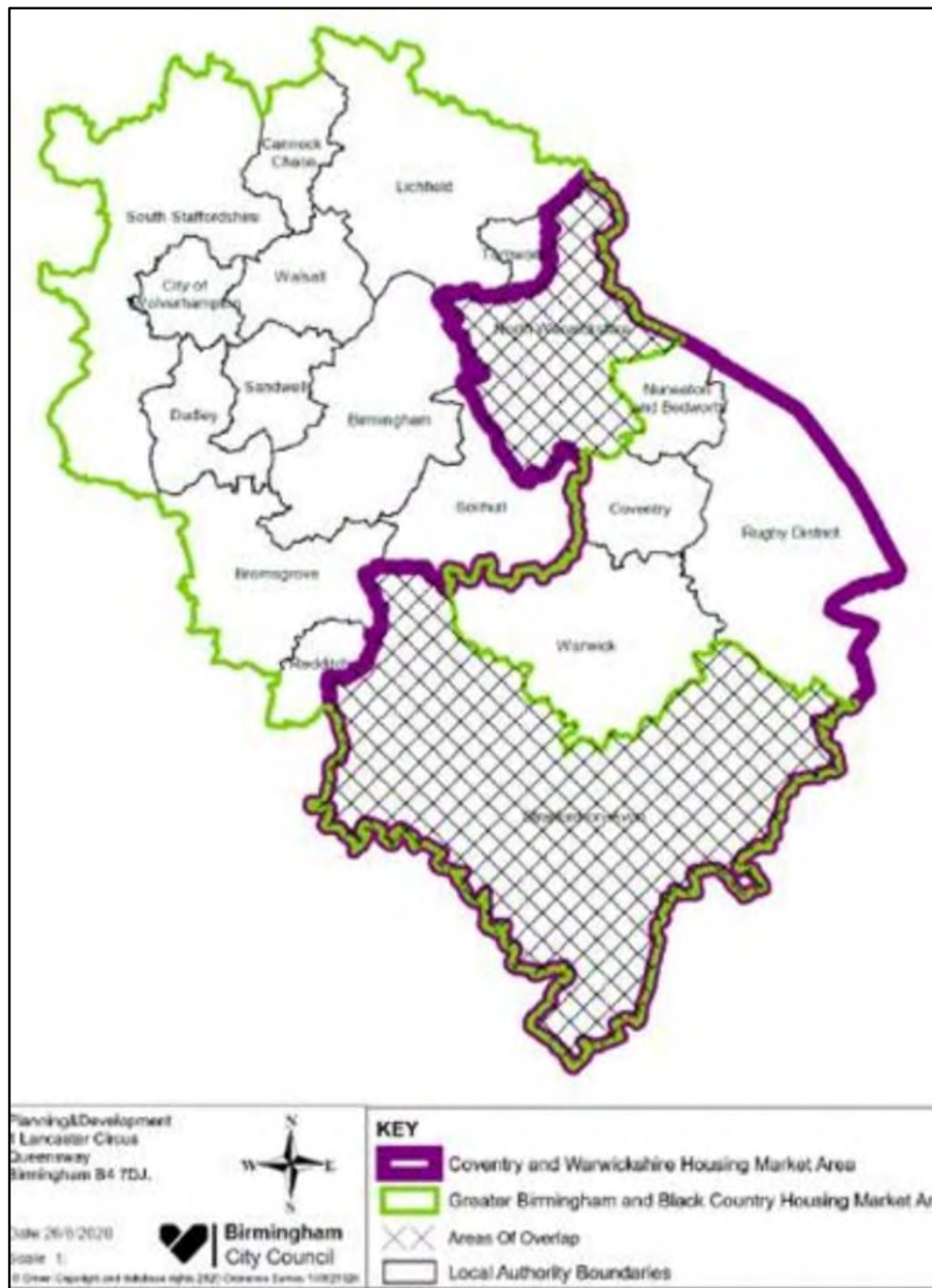
## **Previous Assessments/SHMAs**

- 5.24. Whilst there is an October 2022 Strategic Housing Market Assessment Update (SHMA), prepared by HDH Planning & Development, this does not seek to establish an objectively assessed housing need (OAN) figure instead it simply applies the standard method.
- 5.25. The last assessment to fully consider need, beyond the standard method, was the March 2017 Black Country and South Staffordshire SHMA, prepared by Peter Brett Associates. Table 7.1 of the report states that the OAN requirement for South Staffordshire is 270 dpa. This OAN figure covers the time period 2014 to 2036, and was calculated taking into account market signal adjustments, economic growth etc. Paragraph 7.30 confirms that the OAN figure does not include meeting unmet housing needs from elsewhere in the Housing Market Area (HMA).
- 5.26. However, paragraph 7.31 of the 2017 SHMA notes how there is scope for South Staffordshire to offset some of the wider unmet cross-boundary need, because demand for new homes in this area is higher than other parts of the HMA. This seems to be a reasonable assertion.

## **Meeting Wider Unmet Needs within Greater Birmingham**

- 5.27. Paragraph 5.12/ Table 7 of the Publication Plan document confirms that South Staffordshire will accommodate up to 4,000 dwellings towards the unmet needs in the wider GBHMA, which is unchanged from all the previous consultations dating back to 2018.
- 5.28. Concerns remain on this matter, namely that the 4,000-unit uplift goes far enough to meet the unmet needs in the wider GBHMA area, given the local plan position and land constraints in neighbouring authorities who are unable to sufficiently contribute to the wider Greater Birmingham needs. Whilst it is welcomed that South Staffordshire District Council is looking to contribute towards the delivery of unmet needs from the wider GBHMA, the 4,000 figure does not appear to be based on robust evidence of site capacity and constraints within the relevant local authorities.
- 5.29. The latest GBHMA Position Statement Addendum is from December 2021 provides a detailed update to the housing supply position up to 2031 (with a base date of 31<sup>st</sup> March 2020) which is largely based on the trajectories and committed supplies of adopted local plans. It confirms a total supply of 201,677 against a requirement of 207,979, generating a shortfall of 6,302. Whilst this shortfall is just 2% of the overall requirement the total supply/ shortfall has deteriorated by 3,705 dwellings since 2019 showing a negative direction of travel.
- 5.30. However it is the unmet need and supply position beyond 2031 which is of real concern, as much of this supply is not yet committed and reliant on emerging plans to cover the extended period to 2039/2040.

Figure 5.2 – Map of Authorities in Greater Birmingham Housing Market Area



5.31. Whilst the December 2021 Position Statement does not provide detailed supply estimates beyond 2031 it does give an indication of the latest estimates of unmet need beyond that and which authorities are proposing to contribute (at Appendix 2 of the statement), and, combined with the latest evidence from the relevant authorities, it is worth noting the following:

- The appendix 2 table confirms an unmet need from Birmingham of 37,900 from 2011 to 2031 and an unmet need from Black Country of 28,329 from 2018 to 2039. So a total unmet need of 66,139 from 2011–2039.
- It then confirms adopted/ proposed contributions to unmet need from the remaining authorities<sup>9</sup>, which total 13,935. This leaves a potential shortfall of as much as 52,204.
- Now this doesn't specify the exact periods over which these shortfalls/ contributions cover so we cross reference this with the committed supply to 2031 and wider evidence. The main position statement confirms a residual shortfall of 6,302 to 2031; whilst the Black Country Regulation 18 evidence suggested a shortfall of 11,888 over the period 2031–2039, suggesting an overall residual shortfall of at least 18,190 beyond 2031.
- Of the 13,935 of proposed contributions to meeting unmet need, not all are applicable to the period 2031 to 2039, with Stratford on Avon's adopted plan expiring in 2031 and North Warwickshire's only running until 2033 (and therefore only making a pro rata contribution of 464 between 2031 and 2033). If these are accounted for the proposed contributions total no more than 9,724.
- This suggests a minimum residual shortfall of 8,466 beyond 2031.

5.32. So the December 2021 Position Statement suggests a shortfall between **8,500 and 52,000**. The real figure is likely to be towards the upper end, given the housing requirement figures used in the GBHMA Statement are now out of date and likely to be an underestimate, given they are taken from the 2016 Strategic Growth Study baseline and don't take account of the latest national housing requirements, which include 35% 'city' uplifts for Birmingham and Wolverhampton.

5.33. Indeed, other third party consultant assessments that have looked at this issue and factored in the 35% 'city uplifts' suggest significantly higher levels of unmet need to 2040. These include:

- Barton Willmore's 'Mind the Gap' Report published in March 2021 – which indicated unmet need across the GBHMA could be as high as 122,828 to 2040.
- Turley's 'Falling Short – Taking stock of unmet needs across the Greater Birmingham and Black Country Housing Market Area' Report published in August 2021, – which indicated the shortfall could be as high as 78,000 to 2040.

5.34. This position is likely to have deteriorated further since 2021, due to the following changes in circumstances over the last year.

- The emerging Black Country Local Plan, which was at Regulation 18 stage, was abandoned in October 2022, with the four authorities unable to reach agreement on an approach to meeting future development needs. Each of the four authorities will now have to prepare their own Local Plans, which is likely to lead to significant delays

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<sup>9</sup> South Staffordshire (4,000); Lichfield (2,655); Cannock Chase (500); Solihull (2,105); North Warwickshire (3,790 + 620); Stratford on Avon (2,720 + 265)

in allocating sites to meet the housing need in 4 of the 14 authorities in the wider HMA, which will impact the supply position to 2039.

- The recent Written Ministerial Statement dated 5th December 2022, amendments to the Levelling up and Regeneration Bill (LURB) and potential upcoming changes to the NPPF in respect of the Local Plan process, housing requirements and Green Belt release are also likely to delay Local Plans further and have a significant negative effect on supply in GBHMA.

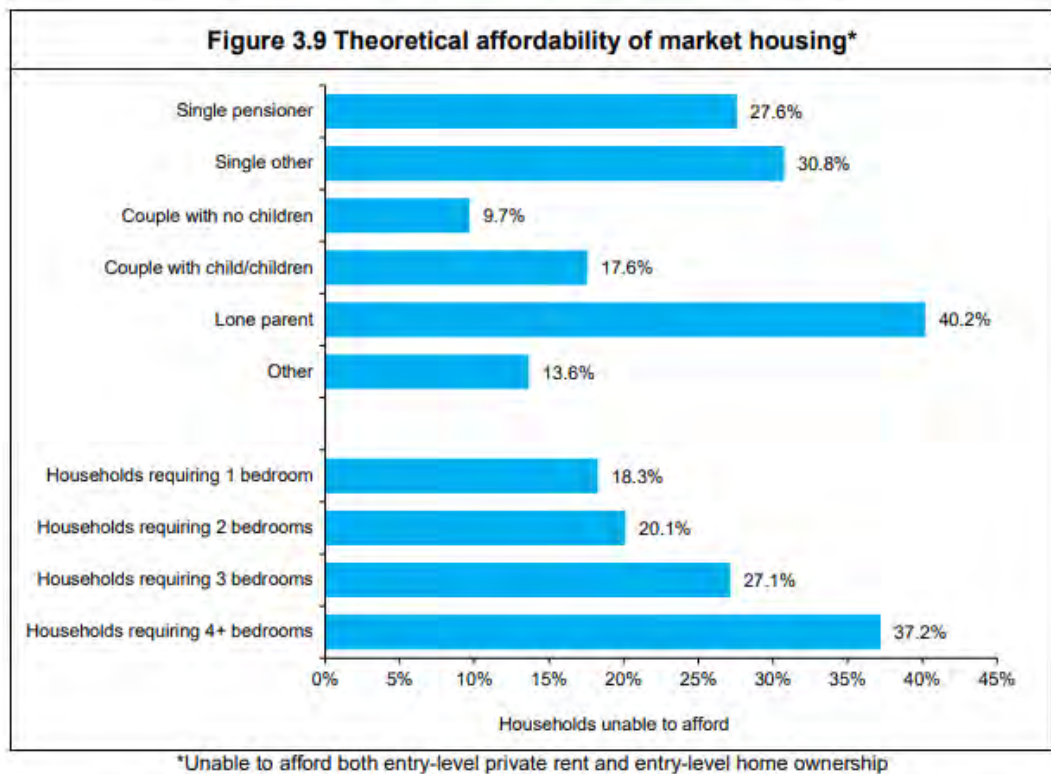
- 5.35. In terms of how this shortfall may be met, the higher range shortfall figure of 120,000 would require the 14 authorities in the GBMHA to take over 8,500 dwellings each, although it is unclear whether adopted or proposed contributions to unmet from the 14 constituent authorities are included in this or how realistic this would be to achieve under the current duty to cooperate regime and without some form of wider strategic plan for the region.
- 5.36. The lower range shortfall figure of 8,500 does already account for all the adopted and proposed contributions from the constituent authorities (including 4,000 from South Staffordshire), with the remaining authorities largely those that aren't able to meet their own needs in full (Birmingham, Redditch, Tamworth and Black Country).
- 5.37. Therefore, either way, the only logical way this shortfall will be met is by existing authorities like South Staffordshire, who can meet their needs, and are already taking or offering to take unmet need, accommodating more.
- 5.38. Furthermore, even with the evident uncertainty around the extent of housing shortfall, the 4,000 unmet need figure suggested by South Staffordshire is not clearly justified and there is significant scope to increase the proportion that South Staffordshire takes of the unmet GBBCHMA housing need. The District covers a significant geographical area that wraps around the Major Urban Area along the western and north western boundaries of the Black Country. The District is also free of significant physical and environmental constraints and has strong functional links with the Black Country and Birmingham. These opportunities for increasing housing growth are less prevalent in the majority of other LPAs across the HMA, including the Black Country Authorities, Birmingham City, Tamworth Borough and Redditch as noted above.
- 5.39. Therefore, there is a compelling case to increase the proportion that South Staffordshire takes of the unmet housing need above 4,000 dwellings. The apportionment of unmet need across the relevant LPAs should be based on a robust capacity study, as opposed to figures which do not appear to be justified or based on demonstrable evidence. It is a matter of strategic, cross-boundary importance that the housing needs of the GBBCHMA are met, based on robust capacity evidence.
- 5.40. On a final note, the strong economic and geographic links that South Staffordshire shares with the Black Country and Birmingham is crucial to meeting the housing needs of the wider HMA. As identified throughout these representations, Dunston Garden Village and its proposed train station is well placed to meet these housing needs, benefiting from an excellent location in relation to the adjoining Black Country conurbation, and with direct rail connections to Birmingham City Centre.



## Housing Affordability

- 5.41. Whilst affordability is factored into the standard method calculation, the Housing Market Assessment Update 2022 (HMAU) contains new data on affordability, including initial findings from the 2021 census which has not yet been picked up by the standard method and demonstrates worsening affordability in recent years which is acknowledged to be one of the principle indicators that housing needs are not being met.
- 5.42. Indeed, the 2022 SHMA confirms that the average housing price in South Staffordshire rose by 19.0% between 2019 and 2021, above the national average. The affordability ratio in South Staffordshire has risen from 7.39 to 8.43 between 2018 and 2022. Figure 5.3 below illustrates the affordability challenges for within South Staffordshire, with the challenges particularly acute for larger family homes and lone parents.

*Figure 5.3 – Theoretical affordability of market housing*

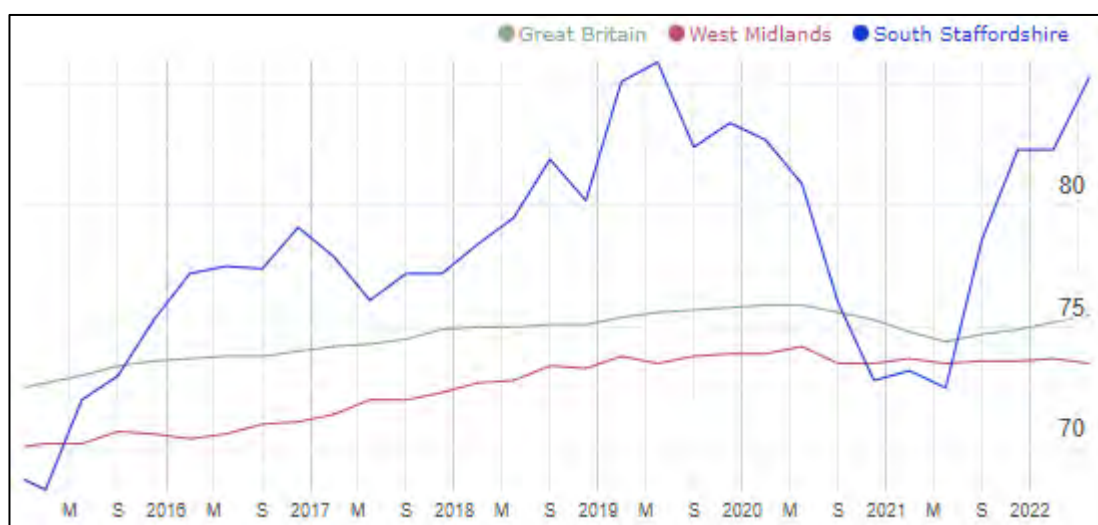


- 5.43. This significant rise in house prices and the corresponding affordability of housing in South Staffordshire provides a compelling case for the need for additional market housing to alleviate cost pressures, and this would also assist in delivering additional affordable housing.
- 5.44. The HMAU identifies the north east sub area as having the lowest median house prices in South Staffordshire which includes the settlement of Great Wyrley. The allocation of additional sites within the north east sub area represents the most appropriate location for housing which is affordable and meets the household requirements set out within the HMAU.
- 5.45. Therefore, the significant housing affordability increases since 2019 need to be taken into consideration when determining the level and location of any additional housing, should this is required through the examination and Main Mods process.

## Market Signals and Employment Trends

- 5.46. The previous 2021 representations to the Preferred Options considered the level of new housing provision required in South Staffordshire. It is helpful to look at past employment trends in the area, which are a relevant market signal in line with para 2a-015-20190220 of the PPG, as housing need will be driven to a large extent by changes in the labour market.
- 5.47. Whilst the latest Housing Market Assessment Update 2022 points to low unemployment and higher levels of skilled rolls than the national average, we present further recent evidence demonstrating the strong employment growth in South Staffordshire and the impacts this will have on future housing requirement.
- 5.48. Utilising Office for National Statistics (ONS) data, the previous representations highlighted strong employment and job growth from 1998 to 2019, outperforming West Midlands and national growth.
- The district saw total employment increase by around 3,000 from 1998-2008, equating to annual growth of 1.1%. This was above the annual increases in West Midlands and Great Britain of 0.3% and 0.9% per annum respectively.
  - The district experienced jobs growth of 2% p.a. from 2009-2015, equating to around 4,000 more jobs. This was higher than the increases of 0.8% p.a. in the West Midlands and 1% p.a. in Great Britain over the same timeframe.
- 5.49. The 2021 representations detailed how the Covid-19 pandemic had impacted on job numbers in South Staffordshire in 2020, with a reduction in job growth in line with trends seen nationally. The latest ONS figures to June 2022 show strong employment growth in South Staffordshire following a dip during the pandemic in 2020 and 2021. Figure 5.3 below illustrates this growth, with 85.3% economically active residents, a growth from 72.5% in June 2021. This far outstrips the average figures for the West Midlands (73.5%) and nationally (75.5%). This rapid employment growth in South Staffordshire coming out of the pandemic indicates the strength of the labour market and wider economy.

*Figure 5.4 – Percentage of those in employment*





- 5.50. The ABI and BRES data indicate that South Staffordshire’s labour market performed strongly between 1998 and 2019, and again since 2021, following a dip during the Covid-19 pandemic.
- 5.51. As it stands, South Staffordshire is planning for delivery of 241 dwellings per annum, which is based on housing need derived from the standard method, which is still based on the 2014 household projections and does not take account of recent economic growth aspirations. Indeed the benefits associated with HS2 and the West Midlands Freight Interchange (WMFI) will not have been factored in, and it does not seem unreasonable to expect the District to continue to experience strong jobs growth over the next 10–15 years in line with the wider trend since 1998. This is likely to place further pressure on the housing market and lead to increased demand for homes in South Staffordshire to support the associated jobs, with more sites required to meet this increased demand, and a new settlement at Dunston would be ideally placed to support employment and housing growth.

## Providing a Buffer to Overall Supply

- 5.52. In addition to the housing requirement issues set out above, the Local Plan Review must also consider the total supply figure required to ensure that this overall requirement is met, and surpassed (in line with the requirement to significantly boost the supply of homes in paragraph 60 of the NPPF).
- 5.53. As noted, the housing target suggested in the Publication Plan is **9,089** over the 20 year period from 2018 to 2039.
- 5.54. Table 8 suggests a total supply of 9,588 dwellings. A windfall allowance of 600 dwellings has been added on top of this, which is an increase from the 450 dwellings presented at the Preferred Options stage. This brings the overall land supply figure within the Publication Plan to **10,188**.
- 5.55. Therefore, the total proposed supply exceeds the target by 1,099 dwellings or **10.7%**. There remain concerns with this level of headroom (which has reduced from 12.9% in the Preferred Options) as it does not allow sufficient flexibility to provide a choice and range of sites and to allow for under delivery of allocated/ committed sites, particularly given the number of strategic sites and level green belt release proposed.
- 5.56. The text of policy DS4 needs to be updated to reflect this as it still says that it provides *“approximately 13% additional homes to ensure plan flexibility”*.
- 5.57. In addition, the increased level of windfall sites (600 or 5.8%) as optimistic, as sources of windfall supply will inevitably dry up once the plan is in place and as more sites are allocated. Given table 8 already picks up a large number of single dwelling consents in the smaller settlements, so this could be considered double counting.
- 5.58. Paragraph 60 of the 2021 NPPF is clear that the Government have a continued commitment to significantly boost the supply of homes. Paragraph 23 of the NPPF also notes how strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. For this reason, the previous position, that a higher land supply buffer is used in order to provide greater certainty that development requirements will be met, has to be maintained.

- 5.59. Indeed, the HBF commonly recommend a 20% buffer is added to housing land supply. The inclusion of such a buffer would provide much greater flexibility for delivery slippage or elongated delivery timescales, and it is important to note that the housing requirement should be viewed as a minimum, which Council's should be seeking to surpass in line with the presumption in favour of sustainable development. Furthermore, the 20% buffer would provide greater choice and competition in the land market and greater flexibility to respond to changing circumstances.
- 5.60. Providing a 20% buffer on the proposed requirement equates to **1,818 dwellings** which would generate a total supply of **10,907** and require allocations for a further 719 dwellings and this would increase further should a higher requirement/ unmet need figure be progressed.

### **Associated Employment Needs in Policy DS4**

- 5.61. We do not provide any detailed commentary or analysis on the employment needs and land requirements set out in policy DS4, other than to highlight and support the fact that the plan makes significant provision to accommodate unmet employment needs from the Black Country authorities and wider functional economic market area (FEMA).
- 5.62. That said, if the housing needs are to reconsidered in line with our recommendations in this section then employment needs will need to be reconsidered at the same time to ensure that these needs are fully aligned and to avoid any associated negative impacts such as unsustainable commuting patterns.

### **Conclusions on Housing Need/ Policy DS4**

- 5.63. To conclude, all of the reasons outlined above provide justification for a higher housing requirement which exceeds the minimum starting point provided by the standard method (241 dpa), with a further uplift to deal with wider unmet need, in addition to what South Staffordshire have already agreed to accommodate (4,000 dwellings); with Dunston Garden Village offering an obvious location to meet this strategic need, given its scale, relative lack of constraints and connectivity with the national rail and road networks.
- 5.64. Accordingly, whilst not challenging the soundness of the plan, we ask that the overall housing requirements and buffers within policy DS4 are reconsidered to ensure it is positively prepared (along with employment land requirements to ensure that they are aligned).
- 5.65. If the Council continue with the proposed requirements, then the wording should be amended to confirm that the headroom is approximately 11% not 13% as suggested.
- 5.66. As such the policy is not positively prepared, justified and consistent with national policy as currently drafted and should be amended as suggested above.

### **Duty to Cooperate Implications**

- 5.67. Finally we stress that in suggesting that South Staffordshire should consider accommodating a higher level of unmet need from the wider GBHMA, we are not suggesting they have failed the duty to cooperate (DtC).
- 5.68. In fact, it is clear from the Duty to Cooperate Paper 2022 that South Staffordshire have undertaken extensive engagement with adjacent authorities and have committed to helping



meet unmet needs since early versions of the plan, which is as much as the DtC can realistically achieve in its current format, which deals with each authority on an individual, ad hoc basis.

- 5.69. Indeed, it is clear that a wider strategic plan for the region, with proper Development Plan status (similar to Places for Everyone in Greater Manchester), is needed to properly tackle the acute unmet need issue across Greater Birmingham.

It is also worth noting that the abandonment of the Black Country Local Plan does not affect the DtC in South Staffordshire. This is because they have never had a SoCG or agreement with Black Country as a whole, and have instead sought individual SoCGs with 15 adjacent authorities (including all 4 of the individual Black Country ones), along with group ones for the Greater Birmingham HMA and the FEMA. Furthermore, the 4,000 dwellings of unmet need they are proposing to take comes from the wider HMAs overall/ 'global' unmet need figure, so doesn't specifically include an element for Black Country, and therefore the progress of the Black Country plan doesn't affect this and the evidence/ justification behind it.

## 6. Longer Term Growth Aspirations for a New Settlement (Policy DS6 – Chapter 5)

- 6.1. This section considers the Council’s longer term aspirations and associated area of search for a new settlement beyond 2039, as set out in Policy DS6 and supporting paragraph 5.66, with a supporting plan provided at Appendix G (page 247).

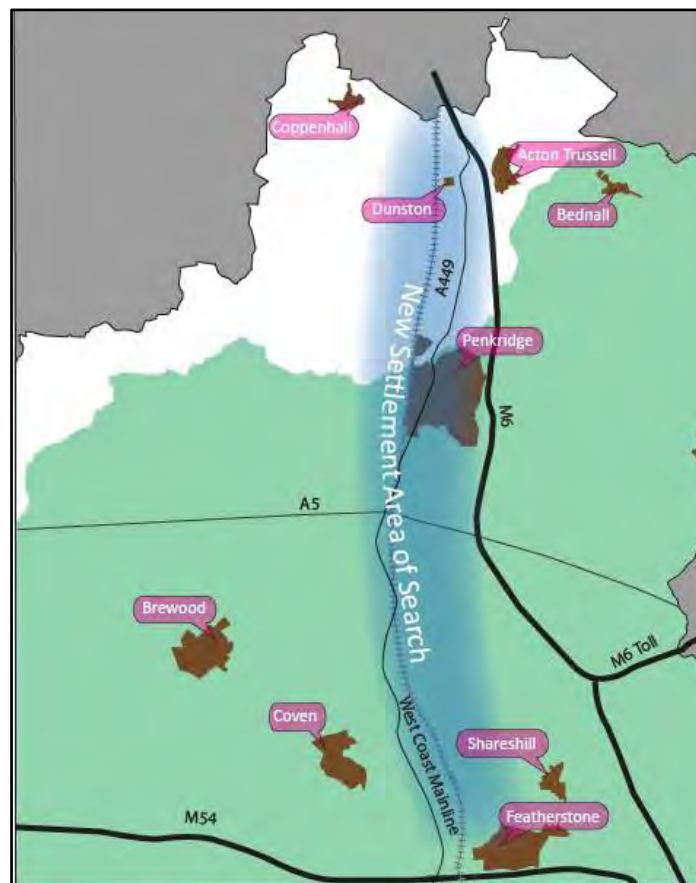
### DS6 – Longer Term Growth Aspirations for New Settlements

- 6.2. The policy makes a commitment for the Council to explore potential options within the district for a sustainable independent new settlement. The recognition that the long-term growth aspirations of the district need to be considered within this plan period is appropriate, particularly in light of paragraph 22 of the NPPF which sets out that where large scale developments such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead.
- 6.3. At this moment in time, the Council do not anticipate that the new settlement would need to contribute to housing growth during the current plan period. However, whether the new settlement would be needed or not within this plan period may depend on the outcome of any monitoring on the delivery of the development strategy, strategic sites and allocated sites identified in the plan. As such, it would be appropriate to include modifications to the supporting text and policy which clarify that the new settlement would not be prevented from coming forward within the plan period, if the relevant monitoring indicators/ triggers suggest that it is needed to come forward before 2039.
- 6.4. Such triggers may include, for example, the under-delivery of net housing completions against the annual housing requirement and slow progress on the delivery of the strategic sites and allocated sites. Rather than a change to the overall strategy this modification will simply provide additional flexibility within the current plan period. Furthermore, such a modification may negate the risk of ad-hoc, unplanned development in the longer term which would not capture all the benefits that a new settlement would.
- 6.5. It is set out in the policy that the new settlement will form a key option that the Council will want to consider "alongside alternatives in future plan-making". At this moment in time, it is not clear what spatial alternatives there are to a new settlement. This plan exhausts all existing allocations and safeguarded land and has already identified strategic sites in locations with access to existing infrastructure and services or where new development could facilitate new infrastructure delivery. As such, clarity should be provided on what alternatives to a new settlement the Council anticipate at this stage.
- 6.6. The policy says that the transport corridor formed by the A449 and West Coast Mainline between Wolverhampton and Stafford has been identified as a potential area of search for such proposals. The logic of the rationale for the chosen area of search is obvious as this is the most sustainable location in the district for a new settlement (benefitting both from existing transport connections and the potential for a new station). Indeed, this is the sole area of opportunity identified in the district in the GBHMA Strategic Growth Study, as also

recognised in the supporting text in the plan<sup>10</sup>. As such it is appropriate to modify the policy wording to clarify that this is the only area of search for the new settlement, as no other potential areas of search have been identified.

- 6.7. The policy goes on to say that the exact location of such a settlement should be considered through the plan-making process as part of a subsequent review of the Local Plan. As such, the exact location of the settlement is not identified in the plan. However, the underlying evidence base of the plan, namely the Housing Site Selection Topic Paper 2022 and the SA, points only in the direction of the site at Dunston as a credible option and fully justifies the identification of this site as the new settlement at this stage.
- 6.8. Of the four options considered for the new settlement (Land at Gailey Island 1 – 585, land at Gailey Island 2 – 585a, Deanery Estate – 665, and Dunston Estate – 029<sup>11</sup>), the Dunston Estate only site which does not have major negative effects due to Green Belt harm, being out with the Green Belt, as clearly shown on the plan at Appendix G – which is reproduced below, and with the relevant pro formas from the Site Selection Paper enclosed at **Appendix 7** and associated plan of the four sites shown over the page.

*Figure 6.1 – Appendix G of Plan: Area of search for new settlement (with Green Belt area in green)*

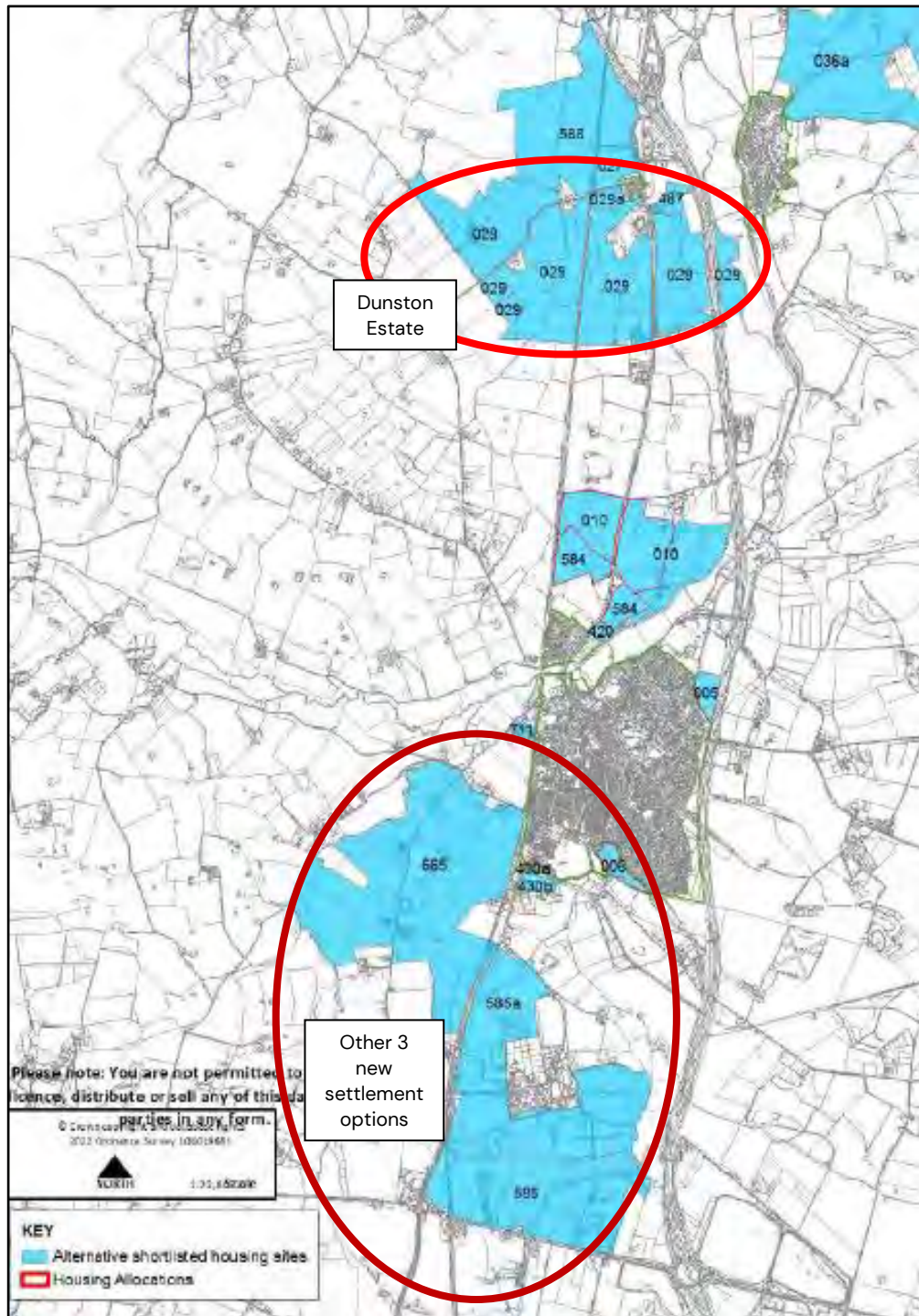


<sup>10</sup> Para 5.66, Publication Plan

<sup>11</sup> within Appendix H of the October 2022 SA (pages H79–H80) and section 5.28 of the Housing Site Selection Topic Paper 2022 (pages 95–97) and Appendix C (pages 540–547)



Figure 6.2 – 4 New Settlement Options (page 97 of Site Selection Topic Paper 2022)



6.9. Considering recent announcements by the SoS for the DLUHC (within the 5<sup>th</sup> December Written Ministerial Statement), that local planning authorities are not expected to review 'precious' Green Belt to deliver housing, therefore this site to be the only feasible option for the new settlement.



- 6.10. Notwithstanding any future changes to the NPPF, the long term protection of the Green Belt is already a fundamental part of national policy which has simply not been accounted for within the current policy wording and area of search.
- 6.11. Indeed, the policy should include an objective that recognises the role that any new settlement should play in protecting the Green Belt over the longer term (i.e. beyond the next plan period which this policy seeks to cover). It follows that the siting of any new settlement within any future Local Plan Review or site selection process would have to consider all reasonable, non-Green Belt options (such as the Dunston Estate) before it could even establish exceptional circumstances for reviewing the Green Belt.
- 6.12. Furthermore, this site has a single willing landowner, and is the only option where a masterplan and technical work has been progressed that we are aware of.
- 6.13. In respect of this technical work we would also reiterate our above comments in section 4, that this includes a review of rail capacity by MDS Transmodal (attached at Appendix 6), which confirms that this site does provide the opportunity to deliver a new railway station, as there is both the physical capacity to accommodate it within the site, and capacity within the wider network to integrate it with existing schedules. This evidence was submitted to the Council back in 2019 but we have never received any formal response or comment on it, and the Site Selection Paper erroneously suggests that no such evidence has been submitted. This is another key point that weighs in favour of the Dunston site over the other new settlement options.
- 6.14. As such, the Council would be justified in modifying the plan to clarify that the Dunston Estate site is the location of the new settlement. Rather than a change to the overall strategy this will simply provide certainty and give the landowner and delivery partner the confidence to make the requisite investment needed to deliver Dunston Garden Village. It would also allow the Council to formally shape the development through the preparation of a supporting SPD/DPD.
- 6.15. It is set out in the policy, that key to the exact location of the new settlement being defined is evidence supporting any future proposal's sustainability, infrastructure requirements, viability considerations, delivery mechanisms and stewardship arrangements. You will be aware of the position of this site in relation to each of these matters, having seen the Promotional Document, and we welcome an open and transparent dialogue with the Council moving forwards.
- 6.16. Dunston Garden Village demonstrably achieves the anticipated vision for the new settlement insofar as it is of a scale that is self-sustaining and enables a genuine mix of vibrant mixed communities that support a range of local employment types and premises, education, retail opportunities, recreational and community facilities with a wide range of housing to meet the needs of the community.
- 6.17. The policy goes on to list a series of objectives that any new settlement would have to satisfy. Again, we point you in the direction of the Promotional Document which demonstrates that Dunston Garden Village:
- Is beautifully designed;
  - Provides mixed communities;



- Is of a sustainable size and location;
- Delivers a variety of transport modes;
- Provides green infrastructure and the ability to live a healthy life;
- Is future proofed and sustains our environment; and
- Is infrastructure led.

6.18. It would also protect the Green Belt over the longer term which, in terms of identifying new settlements should be a key objective that should be added to the policy.

6.19. So in summary, by identifying Dunston Garden Village as its preferred location South Staffordshire Council would:

- Satisfy the requirements of national planning policy tests that are required to be met when preparing a Local Plan;
- Demonstrate that the Council are positively planning for the future of its residents and workforce;
- Protect South Staffordshire's Green Belt in the long term and assist in stemming urban sprawl from the Greater Birmingham area;
- Reduce the future burden and pressures placed on existing settlements within South Staffordshire that will be subject to planned growth over the next 15 years; and
- Secure significant levels of future investment for the Borough in a strategic location that has very few environmental constraints.

6.20. To not do so could result in the proliferation of ad-hoc, unplanned development in the longer term which would not capture all of the benefits that the Dunston Garden Village proposals are able to achieve.

6.21. Finally, we provide an indicative delivery timeline to demonstrate the lead-in times for such a development and why it is so important to provide clarity and confidence now so the landowner can make the requisite investment:

1. **2022-24:** Local Plan Allocation or sufficient status to progress an application.
2. **2025/26:** Community engagement through the preparation of a new settlement SPD/Development Framework to guide any forthcoming planning application.
3. **2024 – 2026:** Collation of application documents through to Outline Planning Submission supported by an Environmental Impact Assessment.
4. **2027:** Outline Planning Granted with S106.
5. **2028:** 1st Infrastructure Reserved Matters Planning Application submission.





6. **2029:** Infrastructure Reserved Matters Planning Application Approval / Technical approvals (S278, S38, S104, S98) achieved. 7.
7. **2030/31:** 1st planning permissions gained for initial residential phases.
8. **2030–2033:** Initial phases of onsite physical infrastructure work, including earthworks, spine roads and drainage areas.
9. **2033 Onwards:** Residential sales/completions with first residents moving into the development, rising up to circa 250 homes occupied per year.
10. **2033–2036:** Focused on early delivery of social infrastructure such as local centre, transport improvements and schools. 11. 2033–2045: Subsequent reserved matters applications for new homes. 12. Circa 2050/55: Completion of the Dunston Garden Village development.

6.22. Accordingly Policy DS6 is not fully justified or consistent with national policy as currently drafted and should be amended as suggested above.

## 7. Relevant Development Management Policies & Monitoring (Chapters 7–15)

7.1. This section comments on the relevant development management policies detailed within Chapters 6–14 of the Publication Plan and builds upon comments made to the Preferred Options in 2021.

### Delivering the Right Homes (Chapter 7)

#### HC1 – Housing Mix

7.2. The policy states that all developments should provide a mixture of property sizes, types and tenures to meet the needs of different groups in the community, and goes on to set the following stipulations:

- For major residential developments, in terms of market housing 70% of properties are to have 3 bedrooms or less, with specific breakdown to be determined on a site by site basis with reference to the latest HMA.
- For major residential developments, in terms of affordable housing, a specific breakdown will be determined with reference to the latest HMA and other affordable housing needs evidence.
- Developments that fail to make an efficient use of land by providing a disproportionate amount of large, 4+ bedroom homes will be refused.

7.3. This policy is inappropriate as currently drafted. Housing mix is best determined on a site-by-site basis, taking account of site-specific characteristics and local demand in the area. The requirement for 70% of properties to be 3 bedroom or less is overly prescriptive in nature and does not allow for a flexible approach.

7.4. Whilst it is understood that the crux of this policy is to maximise densities and the efficient use of land, there will be instances where sites are looking to provide an executive housing offer which requires larger properties. The policy effectively precludes such developments, by stating proposals will be refused that have a disproportionate amount of 4+ bedroom homes. There needs to be a balance.

7.5. The most suitable and appropriate manner to assess housing mix requirements is by determination of the market at the time of submission of a planning application, rather than at the point of adoption of the local plan; this is particularly relevant for larger long term sites like Dunston. Overly prescriptive housing mix standards can often lead to deliverability and viability issues.

7.6. A flexible approach needs to be taken regarding housing mix, which recognises that needs and demand will vary from area to area and site to site. A flexible approach will also help to ensure that housing schemes are viable and appropriate for the local market.

7.7. A more flexible housing mix policy would be more appropriate. The reference to the 70% threshold for 3 bedrooms or less needs to be removed as should the reference to disproportionate amount of large homes.

- 7.8. The policy is not justified or effective as currently drafted and should be amended as suggested above.

### **HC2 – Housing Density**

- 7.9. This policy seeks the efficient use of land, and a minimum net density of 35 dwellings per net developable hectare on developments within or adjoining Tier 1 settlement, in infill locations with the development boundaries of other settlements, or in urban extensions to neighbouring towns and cities.
- 7.10. It also supports lower densities in certain circumstances and on a site-by-site basis in areas not covered by the 35dph standard.
- 7.11. The efficient use of land as per paragraph 125 of the NPPF is entirely appropriate as is some flexibility in the standards in certain locations; however it still sets a single housing density target across the majority of the district, which needs to be relaxed to allow greater flexibility to allow developers to take account of the evidence in relation to market aspirations, deliverability, viability and accessibility.
- 7.12. The policy is not fully justified as currently drafted and should be amended as suggested above.

### **HC3 – Affordable Housing**

- 7.13. This policy requires major residential developments to provide 30% affordable housing, broken down using the ratio of 50% social rent, 25% shared ownership and 25% first homes.
- 7.14. The HBF's comments on this policy note how the Council's Viability Study (2022) clearly highlights the challenges in delivering the 30% affordable housing requirement, and that without higher sales values many sites may not be viable.
- 7.15. Paragraph 34 of the NPPF is clear that development of affordable housing policies must take account viability and deliverability as well as need; as it is unrealistic to negotiate every site on a one-by-one basis because the base-line policy aspiration is set too high, as this will lead to delays in delivery. Such delays and issues could be reduced by taking a variable approach to affordable provision based on the evidence provided in their Viability Study.
- 7.16. The breakdown in terms of tenure broadly aligns with national policy, although should include flexibility to adapt to the latest evidence of need and any future changes to the tenure definitions and requirements of national policy (noting change from Starter Homes to First Homes in recent years). It may also be beneficial for the Shared Ownership definition to be broadened out into other forms of affordable home ownership in line with the NPPF to provide further flexibility.
- 7.17. Finally, the frequent reference to further guidance being provided by the Affordable Housing SPD is noted. The SPD should do no more than clarify the Local Plan policy, and it is suggested that if the requirements for implementing the policy are known to need explanation now, then these should either be included within the Plan now or set out within the explanatory text. The SPD is not the appropriate vehicle for setting new policy and or burdens on delivery which may not have been included in the Plan's Viability Study, and the Plan should provide clarity at the point of adoption as to what it requires.

7.18. This policy is not fully justified as currently drafted and should be amended as suggested above.

#### **HC4 – Homes for Older People**

7.19. This policy requires developments to contribute to meeting the needs of older people and other groups with specialist requirements, through the provision of bungalows, other age restricted single storey accommodation, sheltered / retirement living, and extra care / housing with care and other supported living to be provided as part of the wider mix on site, within both the market and affordable sectors, with the specific mix further guided by the council's latest Housing Market Assessment, local housing need surveys and the Housing Register.

7.20. It also states that all (so 100%) of market and affordable homes will be required to meet the Building Regulations Standard Part M4(2), which has increased from 30% in the 2021 Preferred Options.

7.21. It is important to note that these technical standards are optional and need to be justified as per the PPG<sup>12</sup>, which outlines the range of factors which local planning authorities need to take into account when considering whether to apply such standards:

- The likely future need for housing for older and disabled people (including wheelchair user dwellings).
- Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
- The accessibility and adaptability of existing housing stock.
- How needs vary across different housing tenures.
- The overall impact on viability.

7.22. Whilst we note the October 2021 Viability Assessment (prepared by Dixon Searle Partnership) has factored in 30% provision into site viability costings, we have not assessed the methodology or conclusions in detail and no further calculations provided within the 2022 Viability Study. Furthermore, the evidence base has not yet been provided to demonstrate a clear and demonstrable need for 100% provision of these optional technical standards.

7.23. This policy is not fully justified as currently drafted and requires further evidence, otherwise it should be amended as suggested.

#### **HC8 – Self & Custom Build Housing**

7.24. We welcome this policies overall aspiration to support self-build and custom housing schemes, and to work positively with developers, Registered Providers, self and custom build associations and other community groups to meet the demand from the self-build register.

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<sup>12</sup> Paragraph: 007 Reference ID: 56-007-20150327

- 7.25. However the second and third paragraphs suggest that major developments will be required to provide for self-builders, and may also be required to provide design codes to support delivery of these plots, and to market such plots for a 12 month period before they can be brought forward as standard homes.
- 7.26. We do not consider a blanket approach to all large sites with the associated restrictions noted above to be appropriate, as this is likely to have significant negative impacts on delivery and viability for both regular housing and self-builds; particularly for volume housebuilders who will be bringing the majority of large sites forward, as their approach is not always compatible with self-building. We would therefore ask that this requirement is removed.
- 7.27. Instead, the Council should look to allocate sites specifically for self and custom-build housing, in and negotiation with landowners; supported by a more flexible policy that supports self-build on a site by site basis where there is a demand and appetite for it, and in line with relevant design parameters and other policies.
- 7.28. This policy is not justified as currently drafted and should be amended as suggested above.

## **Design and Space Standards (Chapter 8)**

### **HC10 – Design Requirements**

- 7.29. The policy sets out a range of design requirements which largely reflect the sentiments of the 2021 NPPF and its renewed emphasis on design, although we do raise comments on the following criteria:
- Criteria a – this criteria and wider policy largely relies on detail within latest South Staffordshire Design Guide SPD and relevant national and local design guides etc.; however these documents cannot be given full weight as they have not been subject to examination and are not part of the Local Plan. As such any detail from these documents which is intended to guide the determination of applications for planning permission should be set clearly within this Local Plan policy, to ensure that it is effective in line with the NPPF test.
  - Criteria c – tree lined streets – this should be refined to reflect footnote 50 of the NPPF which states streets should be tree-lined: ‘unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate’, and to note that such an approach is subject to highway authority agreement.
  - Criteria l – simply duplicates policy HC1 and is therefore unnecessary and could be removed.
- 7.30. The policy is not effective or consistent with national policy as currently drafted and should be amended as suggested above.

### **HC11 – Protecting Amenity**

- 7.31. This policy requires all developments to account for the amenity of nearby residents in respect of to privacy, security, noise and disturbance, pollution (including light pollution), odours and daylight.

7.32. We are supportive of this policy and have no specific comments, other than to highlight that a new settlement proposal such as Dunston Garden Village provides an opportunity to factor in amenity at the outset to minimise any impacts, rather than having to work around existing constraints and issues in existing communities.

#### **HC12 – Space about Dwellings and Internal Space Standards**

7.33. The policy requires all new residential developments to meet or exceed the Nationally Described Space Standards (NDSS), and also provides prescriptive external space requirements. In general terms, it is our view that this policy should be more flexible on both internal and external standards to account for specific circumstances on sites that might support smaller units; and to acknowledge that well-designed dwellings below NDSS can still provide good, functional homes.

7.34. In terms of NDSS specifically, The PPG is clear that these are optional, not mandatory, standards and that their application needs to be justified with evidence of need, viability and timing.

7.35. At this stage, the Council have not prepared the evidence base necessary to support the introduction of these standards. Indeed, the Council's Viability Study 2022 only tests five average house type sizes, rather than testing the 16 NDSS compliant house typologies. There is no evidence to demonstrate that testing only a limited number of average sized dwellings would meet all the technical requirements of the NDSS. This is not a robust approach to assessing the impact of NDSS on viability. This issue was flagged by the HBF at the Preferred Options stage in 2021 but has not yet been addressed, and should be accounted for within the process.

7.36. We also highlight the HBFs confirmation that there is a direct link between unit size, cost per sqm and affordability. The policy approach needs to recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and affect customer choice. An inflexible approach which imposes NDSS on all housing removes the most affordable homes and denies lower income households being able to afford homeownership.

7.37. In terms of external space standards, these are broadly aligned with those adopted 2012 Core Strategy (Appendix 6), with a 3 square metre increase for dwellings with 2 bedrooms or less:

- 45 square metres for dwellings with 2 or less bedrooms;
- 65 square metres for dwellings with 3 and 4 bedrooms;
- 100 square metres for dwellings with 5 or more bedrooms;
- 10 square metres per unit for flats/apartments provided in shared amenity areas.

7.38. We object to this prescriptive approach, which does not allow for flexibility in design on a site-by-site basis, where creative design solutions may be required to address other issues such as privacy, lighting etc, which fall short in achieving such prescriptive standards.

7.39. Indeed, there has been an evident move in recent years away from blanket, prescriptive standards towards innovative, design-led solutions (as seen in the Manual for Streets guidance). A greater emphasis has also been placed on design in the 2021 NPPF. Paragraph

128 of the NPPF notes how authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code.

- 7.40. Notably, the National Design Code outlines how in more urban areas there may be a need for more lighting and shorter privacy distances might be acceptable, while in suburban areas lighting might be more minimal and privacy distance might be greater<sup>13</sup>. This clearly emphasises a more localised, nuanced site-by-site approach to design and residential standards, as opposed to a standardised, district-wide approach currently suggested. Such flexibility, as advocated in the National Design Code, also allows for a suitable degree of variety and in turn the delivery of beautiful places.
- 7.41. Therefore the current approach to maintain prescriptive, top-down standards is not appropriate and at a minimum should include amendments to the wording noting 'where possible' and 'where feasible' should be added into the policy.
- 7.42. To conclude, the blanket introduction of space standards has the potential to generate viability, delivery and affordability issue; which is why the PPG requires a strong evidence base to justify their application. This evidence base has not been provided at this stage.
- 7.43. As such, the policy is neither justified nor consistent with national policy, and should be amended as suggested unless further evidence is provided.

### **HC13 – Parking Standards**

- 7.44. The policy sets out parking standards and recognises that these are 'recommended' rather than maximum standards in line with the NPPF, which we support.
- 7.45. In respect of electric vehicle charging, this requires one 7kW (or better) charging point per dwelling. The Council should note that this requirement is already enshrined within Part S of the Building Regulations which took effect in June 2022; so does not need to be duplicated in the Local Plan.
- 7.46. If the policy is to be retained, it should accurately reflect the national Building Regulations standard which states that the total number of charging points must be equal to the number of parking spaces if there are fewer parking spaces than dwellings, or equal to the number of dwellings where there are more parking spaces.
- 7.47. The Council will also need to keep monitoring viability implications here, as the 2022 Viability Study recognises that the cost of providing charging points has increased significantly since 2021, with costs of £895 per dwelling (houses) and £1,961 per dwelling (flats) factored in (previously the 2021 plan had assumed £500 per dwelling, representing an 80% increase in a year). These are based on findings from a government impact assessment, but it is unclear when this was published, and the situation will need to be reviewed again through the to accurately reflect EV charging costs and any associated costs of upgrading the network.
- 7.48. The policy is not consistent with national policy as currently drafted and should be amended as suggested above.

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<sup>13</sup> Page 28, Part 1 the Coding Process National Model Design Code (June 2021)

## Promoting Successful and Sustainable Communities (Chapter 9)

### HC14 – Health Infrastructure

- 7.49. This policy refers to proposed developments causing ‘unacceptable impact’ on existing healthcare facilities but fails to define what level of impact is deemed unacceptable or how that is to be measured. The policy should acknowledge that not all residents of a development will be new to a catchment area of the relevant NHS Trust and that many will indeed be registered with local health care providers, thereby not creating any additional impacts.
- 7.50. Careful analysis is required in respect of the capacity of existing infrastructure to accommodate new patients, before reaching a conclusion as to what any CIL compliant financial contribution might be, and the requirement for CIL compliance of any request should be specified within the policy for clarity.
- 7.51. The policy is not justified as currently drafted and should be amended as suggested above unless further evidence provided.

### HC15 – Education

- 7.52. The policy makes a blanket assumption that new education infrastructure will be required from all new development. However, any such provision to be delivered via S106 legal agreement, must have regard to the tests within CIL Regulation 122 and the policy should make this explicit. Furthermore, the policy should also recognise that new infrastructure will only be required from new development where it can be demonstrated that existing capacity to accommodate growth does not currently exist.
- 7.53. The policy is not consistent with national policy as currently drafted and should be amended as suggested above.

### HC17 – Open Space

- 7.54. This policy sets out open space standards for new residential development, requiring 0.006 Ha of multi-functional publicly accessible open space per dwelling, excluding smaller incidental areas that do not have a clear recreational purpose. We raise no issue with this overall approach, and welcome the recognition that open space can serve multiple functions, however the policy then notes that on-site open space should also include equipped high quality play provision as a default unless an alternative play provision strategy is agreed with the council.
- 7.55. The policy should acknowledge that the type of open space provision, including formal play equipment, should be considered on a site by site basis and take account of on-site constraints and existing provision in the wider area (for example, play equipment may not work within the wider open space strategy on an individual site and may not be necessary if there is an existing play area nearby).
- 7.56. The policy is not fully justified as currently drafted and should be amended as suggested above.



## **HC19 – Green Infrastructure**

- 7.57. This policy seeks to maximise on-site green infrastructure. Where suitable opportunities exist, taking into account local circumstances and priorities, development must demonstrate it has sought to strengthen and promote connectivity with the existing green infrastructure network by:
- Providing interlinked multifunctional publicly accessible open space within new development schemes including public open spaces, attractive cycle and walkways, street trees, green roofs and walls, pocket parks, allotments, play areas and new wetland habitats.
  - Identifying and strengthening potential linkages with green and blue spaces within adjoining developed areas to promote interconnected urban green infrastructure.
  - Connecting together and enriching biodiversity and wildlife habitats.
  - Strengthening green linkages with the wider countryside and major areas of open space such as country parks.
- 7.58. Rigby Estates are supporting the development of high-quality green infrastructure as per the spirit of the garden village approach to development. The only point we wish to reiterate from the comments on Policy HC10 above is that the reference to a requirement for all developments to incorporate tree lined street should be refined to reflect the NPPF.
- 7.59. As such, the policy is not consistent with national policy as currently drafted and should be amended as suggested above.

## **Building a strong local economy (Chapter 10)**

### **EC1 – Sustainable Economic Growth**

- 7.60. This policy sets out the Council’s overarching approach to economic growth and the delivery of employment land to meet the district’s needs to 2039. We welcome the acknowledgement that the Council will work in partnership with the Staffordshire and Stoke Local Enterprise Partnership and other stakeholders, and that the Council is meeting both local needs and those of the wider functional economic market area (FEMA) as noted in policy DS4.
- 7.61. The policy goes on to set out criteria and requirements for different types of employment provision, including B8 logistics/ warehousing, where it would benefit from additional wording recognising that proximity to the national road network is a critical locational requirement for such uses.
- 7.62. Indeed, the proposed employment development within the Dunston Garden Village is such a location, with direct access to the A449 and Junction 13 of the M6.
- 7.63. The policy is not unsound but could be improved with the amendments suggested above.

## Community services, facilities and infrastructure (Chapter 11)

### Policy EC8 – Retail

- 7.64. We welcome the acknowledgment in this policy, that retail provision will be required within the proposed strategic sites (SUEs), and that these will be reviewed for inclusion in the Retail Centres Hierarchy as part of the next Local Plan review process.
- 7.65. Taken alongside our comments on policy DS6 we would ask that this is applied to the new settlement as well as the SUEs.
- 7.66. The policy is not unsound but could be improved with the amendments suggested above.

### Policy EC11 – Infrastructure

- 7.67. This policy confirms that all developments will be required to deliver or contribute towards necessary supporting infrastructure with reference to the supporting Infrastructure Delivery Plan.
- 7.68. We fully support this aspiration, and note the significant opportunities that Dunston offers to provide infrastructure improvements due to its scale and location, including potential provision of a new station.
- 7.69. We would also stress the importance that the Infrastructure Delivery Plan is up to date at the time of examination to ensure that the viability implications of the proposed strategic infrastructure have been fully accounted for in the plan, given current rates of inflation, particularly in respect of construction costs.
- 7.70. We raise no issues of soundness with this policy subject to comments above.

### Policy EC12 – Sustainable Transport

- 7.71. This policy states that the Council will maximise sustainable transport measures within all development. We welcome this policy and raise no specific issues, other than to reiterate that the Dunston Garden Village proposals offer significant sustainable transport opportunities including a potential new railway station and improvements to bus routes.
- 7.72. We raise no issues of soundness with this policy.

## The Natural and Built Environment (Chapter 12)

### NB1 – Protecting, Enhancing and Expanding Natural Assets

- 7.73. The policy seeks to support proposals which protect and enhance the quality of the natural environment. When determining planning applications, the council will apply the principles relevant to habitats and species protection as set out in national legislation and policy. This includes impacts on internationally, nationally and locally designated sites.
- 7.74. We have no comments to make on this policy.



## **NB2 – Biodiversity**

- 7.75. It is stated that all new development will contribute a measurable net biodiversity gain, with a threshold of 10% for major developments. It is also stated that Applicants will be expected to submit a Biodiversity Baseline Assessment with the calculation to be based on Defra's biodiversity metric.
- 7.76. Following the passing of the 2021 Environmental Bill, BNG is expected to become a mandatory requirement in an as yet unconfirmed date in late 2023. As such, we wish to emphasise the importance of the policy requirements being drafted in line with the requirements of the Environmental Bill in respect of net gain.
- 7.77. There should be a flexible approach to the delivery of the BNG within sites. In a comparable manner to open space discussed above, a pragmatic approach to BNG should be taken where improvements to biodiversity can be delivered in conjunction with open space provision, so as not to put unreasonable pressure on developable area and associated viability on sites.
- 7.78. The policy is not unsound but could be improved with the amendments suggested above.

## **NB3 – Cannock Chase SAC**

- 7.79. The policy states development will only be permitted where it can be demonstrated that the proposal, either directly or in combination with other plans or projects, will not be likely to lead to an adverse effect upon the integrity of the Cannock Chase Special Area of Conservation (SAC). The effective avoidance of, and/or mitigation for, any identified adverse effects on the Cannock Chase SAC must be demonstrated to the council and Natural England and secured prior to the council giving approval for development.
- 7.80. It is noted that the principal legislative framework surrounding SAC's remains unaltered. The principle of requiring mitigation to address the likely adverse effects of residential development remains valid, and therefore this policy largely duplicates national policy in this regard.
- 7.81. We welcome confirmation that the previously suggested approach of offsite Suitable Alternative Natural Greenspaces (SANGs), is not being pursued at this time.
- 7.82. We raise no issues of soundness with this policy.

## **NB4 – Landscape Character**

- 7.83. The policy seeks to maintain/enhance the rural character and local distinctiveness of the landscape. This includes considerations of the County Council Landscape Character Assessment and Historic Landscape Characterisation in assessing their impacts upon landscape character. Trees, woodland, and hedgerows should be protected and retained, with any new/replacement planting maximising biodiversity. Guidance is also offered in relation to proposals impacts on Historic Landscape Areas and the Cannock Chase Area AONB.
- 7.84. In respect of the Dunston site, we refer back to the Landscape and Visual Assessment provided at Appendix 3 (and originally submitted to Local Plan Spatial Housing Strategy

consultation in 2019), which thoroughly assessed the proposed development's impact on surrounding landscape character and found it to be acceptable.

7.85. We raise no issues of soundness with this policy.

## **Climate Change and Sustainable Development (Chapter 13)**

### **NB6 – Energy and Water Efficiency, Energy and Heat Hierarchies and Renewable Energy in New Development**

7.86. Our comments on this policy include detailed input from our selected development partner, as it relates to detailed Building Regulation requirements which are critically important to future housing delivery.

#### *Part 1 – Residential development carbon reduction and water efficiency standards*

7.87. Our selected development partner is concerned with the requirements for carbon emission reductions in Part 1 of NB6, which go beyond the Government's Future Homes Standard roadmap that most developers are working to and on which they have based their future plans, and indeed our selected development partners own zero carbon homes roadmap – which aims for all their house types to be zero carbon (regulated energy only) by 2030.

7.88. The policy stipulates that all new developments must achieve net zero regulated carbon emissions, but then states that a minimum of 63% reduction should be applied on 2021 Part L. These are different standards, and it is not clear from the consultation how the 63% requirement would be implemented. The policy wording goes on to state that a 10% improvement on the Part L 2021 Target for Fabric Energy Efficiency and that homes should not be gas free. It is unclear whether South Staffordshire have considered the implications of these standards on deliverability as it could significantly impact the typology of homes provided – hence the need for changes like this to introduced gradually and applied equally across UK.

7.89. In any case, it is important to state that we agree with the need for advancing carbon reduction standards, but believe that these targets are not the most appropriate way to achieve the desired outcomes. Whilst the Future Homes Standard should set the overall framework and timeframes for the wide scale deliverability of carbon reductions, where opportunities arise our selected development partner would be open to explore advancing standards on select sites, which can contribute to increasing industry readiness for when Future Homes Standard is introduced.

7.90. They are currently on track to move all their house types across to updated Building Regulations Part L which will deliver a 31–35% reduction and will uplift their standards again in 2025 to a 75–80% reduction – in line with the Future Homes Standard. There are a number of reasons why building ahead of the Future Homes Standard now may not actually be the best solution. Principally, because of the potentially detrimental local impact on delivery through a lack of sufficiently skilled labour available to implement these new technologies at scale.

7.91. Our selected development partners approach, which is based on the Future Homes target roadmap, takes a more gradual approach which they think is the right one. This roadmap, which they suggest South Staffordshire follow, allows time for the government to clarify their



policy position on key issues such as whole life carbon where at present there is considerable uncertainty as to how this should be consistently measured. The 2025 implementation date allows time to unpick challenges, carry out appropriate research & development to test low carbon solutions, as well as monitor smaller scale Future Homes Standard projects and how products and the associated supply chain performs.

7.92. Regarding Part (b), our selected development partner agrees in principle that additional onsite renewable energy should be provided to assist in meeting net zero regulated energy targets. However, they would urge South Staffordshire to be flexible in the application of this policy to take account of site-specific constraints which may constrain the onsite provision of, or offsite connection to, renewable/low carbon energy generation.

7.93. Concluding on Part 1, our selected development partner would like to express their support for the requirement for all developments to demonstrate a water efficiency standard of 110 litres/person/day. Nationally, they currently achieve 105 litres/person/day across all their developments and house types and are fully set up to continue our delivery of this.

### Part 3 - Embodied carbon and closing the performance gap

7.94. Our selected development partner recognises that understanding the embodied carbon of all proposed materials on a development is an important aspect of driving the use of more sustainable practices. Whilst in principle they do not object to a Whole Life Carbon Assessment (WLCA) being required, having discussed with their in-house technical experts, they consider there are issues surrounding data collection to be able to undertake a proper WLCA. Principally, many manufacturers are still lacking the creation and verification of data for Environmental Product Declarations (EPDs).

7.95. Most EPDs are from France or Belgium, as both countries require EPDs for construction products. Though there are UK based EPDs, these are often generic values which will not accurately reflect a completed property, so it is important that South Staffordshire allow some tolerance when assessing any submitted WLCA. There are also a few reasons to why in the UK we do not have enough of what is needed to carry out WLC assessments:

- EPDs are currently taking around 3 years to be created and verified (leading to potential disruption to the supply of homes if a WLCA cannot be provided due to lack of EPDs)
- Manufacturers often have not calculated the Life Cycle Assessment of their product/doesn't have any carbon data (impacting the robustness of any submitted WLCA)
- There is no mandatory requirement for construction products to generate EPDs (again impacting the robustness of any submitted WLCA)

7.96. Without the full provision of robust EPDs, the assessment process becomes a lot more difficult / time consuming and the WCLA overall becomes somewhat compromised.

7.97. Also, given the extent of information required to provide a meaningful WLCA, careful consideration would be required around the timing of submission to the Council. Our selected development partner suggests that if a WLCA is to be submitted, then it should be required as part of the planning conditions attached to a grant of detailed planning permission. This certainty on what is being built would avoid abortive resource and cost, for

both applicants and the LPA, as it would prove difficult for applicants to submit a robust WLCA based on Outline application parameters. They would strongly advise the Council to talk with the development industry about the timing of submitting WLCAs should they pursue this via Policy NB6.

7.98. Regarding the Part 3 requirement for all major residential and non-residential developments to implement a recognised quality regime that ensures as built performance (energy use, carbon emissions, indoor air quality, and overheating risk) matches calculated design performance. Our selected development partner have trialled as built assessments across a small proportion of our sites nationally and would like to make South Staffordshire aware of some important issues that should be considered through this Local Plan consultation:

- There are registered inconsistencies between the currently available as built testing methodologies which could undermine the robustness of any assessment submitted. Testing methodologies need to undergo more rigorous testing and application before they are rolled out at scale.
- There are a limited number of companies offering as built testing and many, if not all, are still principally in the Research & Development stage. It is unlikely that upon Local Plan adoption, the current sector will be able to cope with the demand of development assessment – with a potential consequent delay to housing delivery arising.
- Key elements of the current as built assessment methodology can only be undertaken in Winter. This would effectively preclude large sections of a development from being tested and undermine the robustness of any submitted assessment.

7.99. Considering these issues that our selected development partner have experienced first-hand, they would ask:

- that South Staffordshire reconsider the requirement for immediate implementation of as built assessments in the Local Plan and instead consider rolling out this requirement at a later date, once the Government undertake further national scale research projects into their implementation.
- If the policy is carried through to EiP stage, that South Staffordshire adequately demonstrate as part of their evidence base that the current as built assessment sector will be able to meet the resultant demand should all allocations in the Local Plan come forward for delivery on expected timescales.

7.100. Accordingly, the policy is not justified or consistent with national policy as currently drafted and should be amended as suggested above.

## **Enhancing the Historic Environment (Chapter 14)**

### **NB8 – Protection and Enhancement of the Historic Environment and Heritage Assets**

7.101. The policy details how the historic environment will be conserved and enhanced, and heritage assets will be protected in a manner appropriate to their significance. Proposals are expected to preserve or enhance the character, appearance and function of heritage assets and their settings and respect the significance of the historic environment. Development proposals



which would cause harm to the significance of a heritage asset, or its setting, will not be permitted without a clear justification in accordance with legislation and national policy.

- 7.102. We have no specific comments on Policy NB8, as it largely reflects and duplicates national heritage policy and legislation.

### **Monitoring the plan (Chapter 15)**

- 7.103. We agree that the principle mechanism for monitoring the plan should be the Annual Monitoring Report (AMR) and would stress that these are updated in a timely and consistent format each year to allow effective monitoring and the ability to notice trends in certain areas, such as housing delivery (as if the format changes each year it is difficult to track if delivery is improving or deteriorating etc).
- 7.104. We do not make any detailed comments on the proposed monitoring framework in Appendix J other than to note it only addresses the strategic objectives of the plan and their associated key policies. We presume this covers all strategic policies, but this is not made clear, and therefore it would be useful to confirm in this section (or the list of policies at the beginning) those which are subject to monitoring and those which aren't.
- 7.105. We reserve the right to make further comments on this at the EiP.



## 8. Conclusions

- 8.1. Pegasus Group are promoting the land holdings of Rigby Estates LLP at Dunston, South Staffordshire. These representations, alongside previous representations by FWP and supporting Masterplan, have demonstrated that the land at Dunston is an available, suitable and developable site which forms **a logical location for a new settlement given its large single ownership, location outside the Green Belt, connections with the national road and rail networks and relative lack of other environmental constraints.**
- 8.2. **Dunston is the only new settlement option within South Staffordshire, which is not located within the Green Belt,** and was identified within the GBHMA SGS as a location for the development of a new settlement. As far as we are aware it is the only new settlement option where a Masterplan and technical work has been progressed, as evidence in the attached Promotional Document (Appendix 1), earlier Vision Document (Appendix 2), and Rail Feasibility Evidence that confirms that the site could accommodate a new station.
- 8.3. Furthermore, Rigby Estates LLP have now agreed terms with a major PLC development partner. This partner has unparalleled experience of developing large and complex developments – and will use their integrated planning promotion, master development, residential development and commercial development expertise to ensure Dunston Garden Village comes forward in a timely and fully comprehensive way. We will be in a position to name the developer by the time of the examination.
- 8.4. The latest proposals suggest that the site is capable of accommodating between 3,000 and 6,000 homes, dependent on densities and whether adjacent land is allocated; along with 7.8 hectares of employment floorspace, 4 hectares of retail, leisure and community uses, a new school and a new railway station; within an attractive, walkable setting which generates real health and environmental benefits.
- 8.5. In respect of housing need, the baseline OAN figure should be increased, above and beyond the standard housing calculation figure which should be viewed as a minimum. Furthermore, the additional 4,000 dwellings proposed is lacking in justification and does not go far enough to meet the unmet needs in the wider GBHMA area, given the local plan position and land constraints in neighbouring authorities. We also note that the proposed supply identified within the plan should surpass the housing target to provide a choice of sites, and flexibility to account for any under delivery over the plan period.
- 8.6. In overall terms, these representations have identified several factors that inform the case for a higher housing land requirement e.g. economic growth and infrastructure improvement strategies; an insufficient land buffer on the proposed requirement; and an insufficient level of unmet need from the wider GBHMA. On the matter of unmet need, it is clear that there is yet to be agreement on the full extent of the shortfall, albeit there is a residual shortfall of at least 30,000 to be met by between 6 and 10 GBHMA authorities (including South Staffordshire), which would require South Staffordshire to take a further 3,000 – 5,000 homes, above the 4,000 already agreed, which would increase their total required supply by 30 – 50%.
- 8.7. Finally, we reiterate that the proposed development fully aligns with paragraph 73 of the NPPF and the latest government guidance on Garden Communities in that it:
- Is a purpose built new settlement;



- Provides a community with a clear identity and attractive environment;
- Provides a mix of homes, including affordable, and the potential for self-build; and
- Has the opportunity to be planned over a long period by the local authority and Rigby Estates in genuine collaboration with the local community.

8.8. In addition to housing it will also provide:

- Job opportunities within a large employment area and local centre;
- Attractive green space and public realm areas throughout the site;
- Transport infrastructure, including roads, buses and cycle routes, and the potential train station;
- Community infrastructure, a school, with potential for other community, healthcare and energy uses; and
- A plan for long-term stewardship of community assets, and renewable energy generation, to be developed in consultation with the Council.

8.9. Rigby Estates LLP is committed to working collaboratively with the Council and Key Stakeholders to ensure that the Borough's housing and employment needs are met in a sensitive and sustainable manner, both within the existing Local Plan Review, any future review or additional DPD/SPD process required to deliver a new settlement.

8.10. We therefore respectfully request that the Council formally identify the Dunston site within the current plan, with supporting investment from the landowner, and delivered beyond in line with paragraph 22 of the NPPF.



# **Appendix 1 – Promotional Document incorporating Site Masterplan (2022 Update)**



Rigby Estates LLP  
Cumbria - Lancashire - Staffordshire



# DUNSTON GARDEN VILLAGE

A sustainable new settlement of 3,000 to 6,000 new homes, employment land, local centres, schools and new infrastructure including a new rail station.



## Dunston Garden Village is:

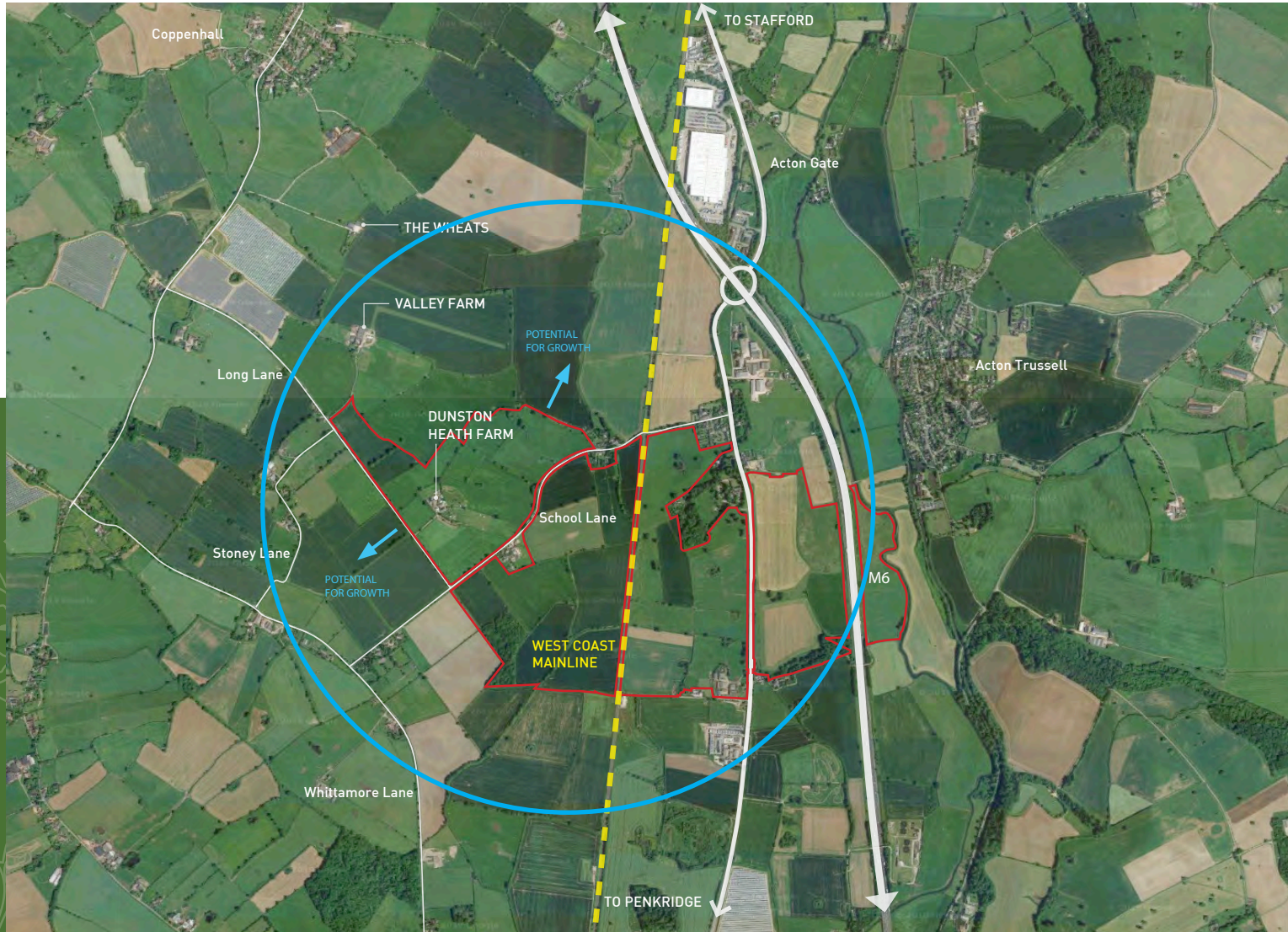
- An exceptional strategic development opportunity and a key location within South Staffordshire and the West Midlands capable of delivering a new settlement;
- the only new settlement development opportunity within South Staffordshire (and one of very few within the West Midlands) that is not located within the Green Belt and would therefore help to preserve the remaining Green Belt land within the Borough for a prolonged period;
- located next to Junction 13 of the M6 and on the West Coast Mainline and therefore highly accessible. Public transport commuter times from the nearby Penkrudge Train Station are just 30 minutes to Birmingham New Street, 10 minutes to Wolverhampton and 7 minutes to Stafford;
- eminently deliverable and capable of accommodating 3,000 - 6,000 sustainable new homes, new employment land and a range of community facilities. The initial phases capable of delivering 3,000 are all within one ownership (Dunston Estate) to enable early and effective delivery;
- now in partnership with a major PLC developer and capable of delivering all necessary infrastructure early on in the development process, and would be able to deliver new homes by 2033 through to 2055; and
- now looking to partner with South Staffordshire Council to provide a positive planning policy position for the development opportunity as part of the emerging Local Plan to facilitate some delivery within the proposed plan period up to 2039, if needed, noting the lead in times for development of this scale.





Site location showing greenbelt and train journey times from Penkrudge Station.







-  Suitable Development Land
-  Dunston Estate Ownership

### Site Context Plans



# Masterplan

Important tree buffer proposed along this boundary. Nudge development away from boundary in locations where it is too close to allow for a dense buffer

Potential for a range of habitat enhancements within flood zone, including more woodland to break up development mass

Woodland and tree belt to eastern boundary to screen views of M6 from within development as well as in views from the east

Proposed woodland block to assist in screening views, in character with others within surrounding landscape

Additional tree planting to mitigate views from properties and break up development mass

Existing woodland retained

Buffer planting to southern boundary

Land suitable for bio-diversity enhancement





# Our Vision

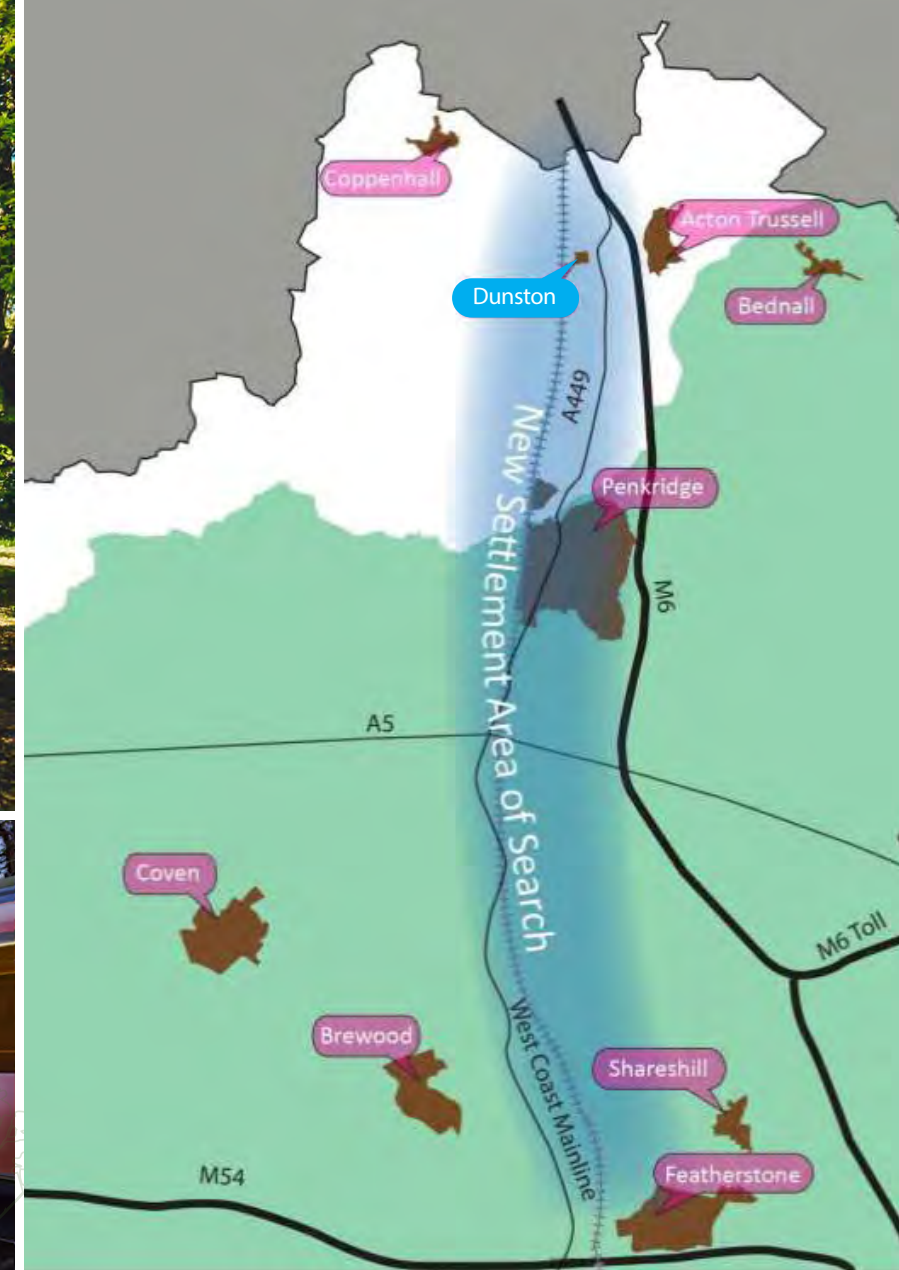
## To create a highly sustainable new community that delivers:

- ① A vibrant and accessible community heart to the settlement with a new train station, retail and entertainment uses and community uses that create an immediate sense of place, community spirit and ownership;
- ② Around 3,000-6000 sustainable new homes<sup>1</sup> located within walkable neighbourhoods and are delivered to make best use of localised district heating, renewable energy and sustainable construction opportunities;
- ③ Around 8 ha of complementary employment uses to provide the workforce with localised employment to reduce travel to work distances and make use of the strategic proximity to the M6;
- ④ Significant levels of enhanced green infrastructure running through the heart of the settlement and framing its borders to provide an attractive and high quality setting, health and wellbeing benefits and significant levels of bio-diversity net gain;
- ⑤ The site is eminently deliverable. Various direct road frontages are available as are long stretches of land along the motorway and national rail network and there is a critical mass available within one ownership to ensure progress can commence as soon as possible; and
- ⑥ Other land ownerships to the north and west could also be added to any potential allocation to extend the settlement up to 6,000 homes in order to aid the delivery of key infrastructure should this be deemed beneficial.



<sup>1</sup> Scope to increase the 3,000 homes figure based on densities and additional land being allocated.







# What needs to be done now?

## Planning Policy Requirements

Paragraph 22 of the NPPF represents a clear advancement in how national government expect local authorities to consider large scale new development opportunities. It states:

*'Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.'*

Embodying Dunston Garden Village within a clear and transparent local planning policy that respects the fact that the overall vision will take around 30 years to fully achieve is one that the Estate would welcome and applaud.

The currently drafted Policy DS6 – Longer Term Growth Aspirations for a New Settlement, within the Draft Staffordshire Local Plan confirms the Council's aspiration to deliver a new settlement that is:

- beautifully designed,
- provides mixed communities,
- is of a sustainable size and location,
- delivers a variety of transport modes,
- provides green infrastructure and the ability to live a healthy life,
- future proofed and sustains our environment, and
- infrastructure led.

However, the policy does not identify a specific site and instead provides a wide area of search along the M6 corridor. Dunston Garden Village offers all of the above and a commitment from a landowner that is willing to invest time and effort now to ensure the above aspirations are viable and deliverable. The Council therefore have scope to make a bolder commitment to this vision now by demarking Dunston Garden Village as its preferred location. In doing so it would:

- Satisfy the requirements of national planning policy tests that are required to be met when preparing a Local Plan;

- Demonstrate the Council are positively planning for the future of its residents and workforce;
- Protect South Staffordshire's Green Belt in the long term and assist in stemming urban sprawl from the Greater Birmingham area;
- Reduce the future burden and pressures placed on existing settlements within South Staffordshire that will be subject to planned growth over the next 15 years, and
- Secure significant levels of future investment for the Borough in a strategic location and one that has very few environmental constraints.

To not do so could result in the proliferation of ad-hoc, unplanned development in the longer term which would not capture all of the benefits that the Dunston Garden Village proposals are able to achieve.







# Achieving Our Goal

Our goal is to achieve an award-winning development that can be cited as a case study for best practice going forward and one that ultimately creates a community that everyone would be proud to be part of and minimises its impact on our environment.

To achieve a collective ambition, we recognise the following aspects have to be secured:

- **Availability** – With the land under the control of one owner, we can commit to making the land available and we can accommodate all requirements within the ownership to help fast track delivery without the need for protracted negotiations.
- **Experience** – We have partnered with some of the best and most renowned professional practices and delivery partners within the UK that have a wealth of experience in delivering new sustainable communities.
- **Collaboration** - Achieving our ambitious goals and vision requires dedication and commitment on our part and supportive collaborative working with the Local Authority, key stakeholders and the local community. It has to be a group effort and cannot be our vision alone.
- **Time and Resource** – To deliver a new sustainable settlement of the scale proposed alongside all of the necessary physical and social infrastructure required to support a new community requires a significant amount of time, forward planning and private investment.
- **Commitment** - To secure the necessary input and dedication required to deliver an award winning new settlement, there has to be a positive political recognition instilled at a local policy level to ensure all the benefits of the proposal are adequately secured. The Council's emerging Development Plan provides the optimal opportunity to positively plan for our vision.

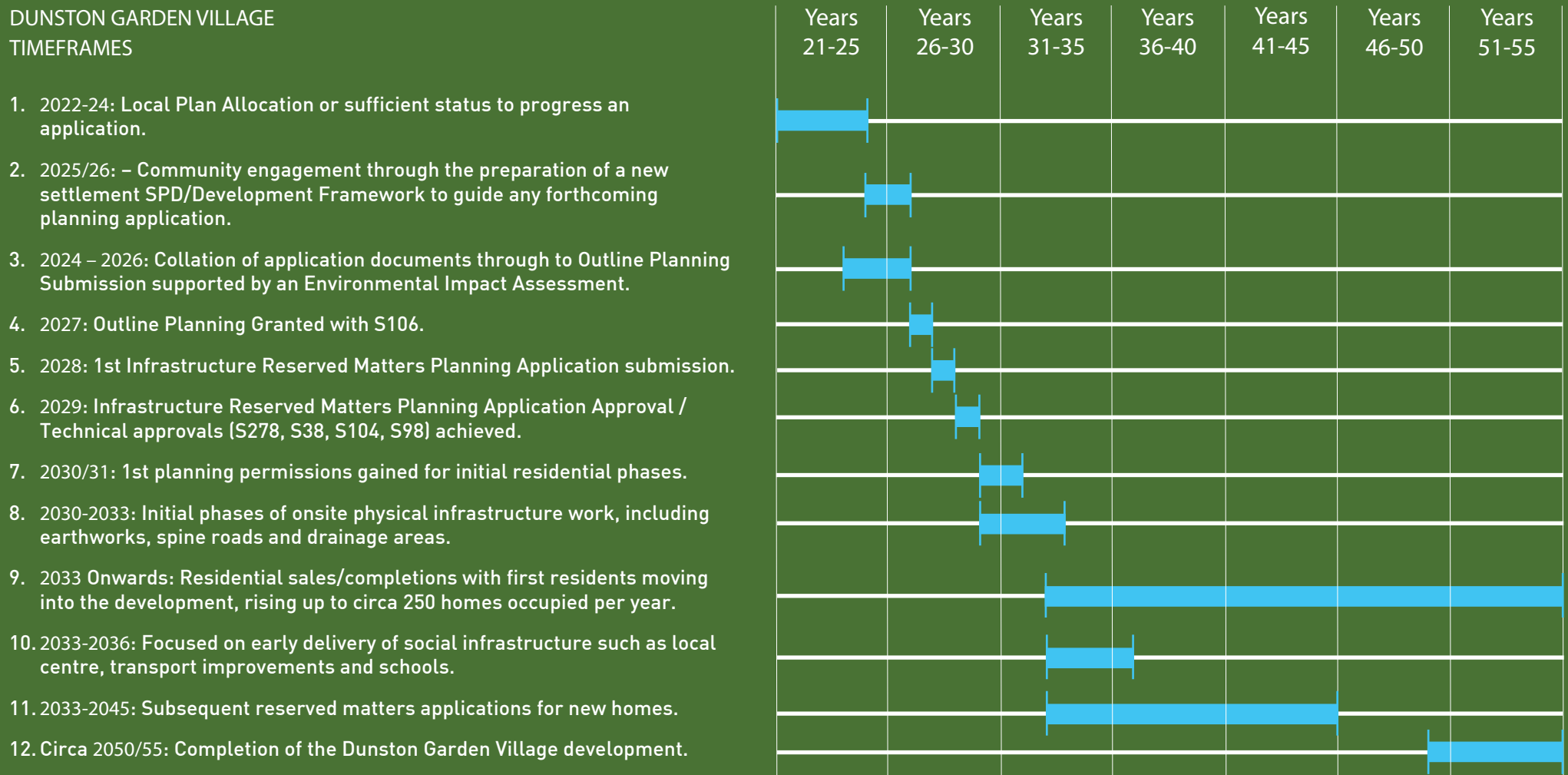
The Dunston Estate have now agreed terms with one of the UK's foremost PLC developers, who will deliver an integrated package of planning promotion, master development, residential development and commercial development services over the site. A Master Developer's role is the ownership of a Place, with the delivery of all physical and social infrastructure. Such a role and responsibility helps to ensure the quality of the environment, the consistency of the local relationships/engagement and leaves the leading housing developers to do what they do best – build great homes.

However, it is paramount that a positive planning policy framework is set now to positively guide early engagement amongst the principal landowner, any other landowners, statutory authorities and consultants, the master planner and master developer and the local community. The opportunity to provide a positive planning policy exists now through the emerging South Staffordshire Local Plan. Based on the timeframes of that plan, we consider the following would be achievable.





**DUNSTON GARDEN VILLAGE  
TIMEFRAMES**

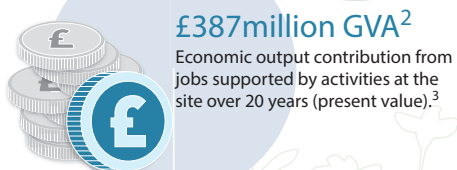
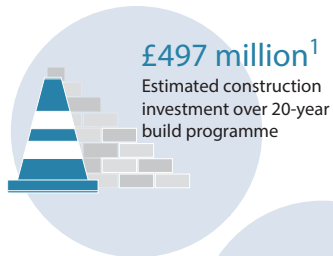


# Benefits of Dunston Garden Village

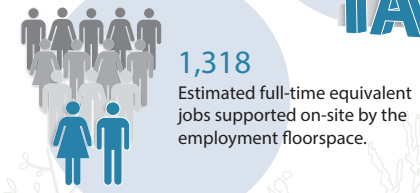
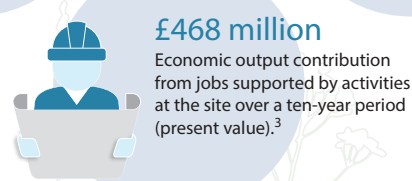
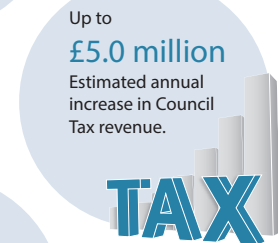
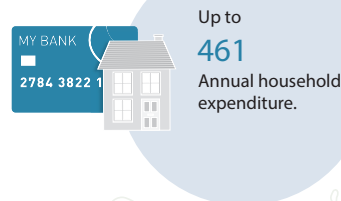
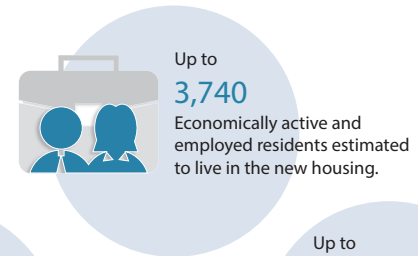
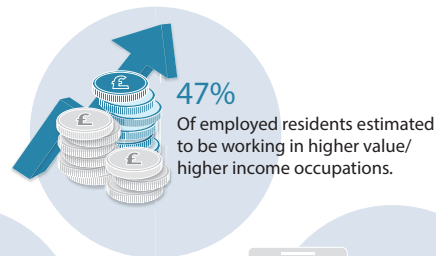
## DUNSTON GARDEN VILLAGE

CONSTRUCTION OF UP TO 3,000 RESIDENTIAL DWELLINGS, 7.8HA OF EMPLOYMENT FLOORSPACE, A LOCAL CENTRE AND A NEW RAILWAY STATION

### CONSTRUCTION BENEFITS



### OPERATIONAL BENEFITS



<sup>1</sup> The construction cost has been estimated using the BCIS Online tool and is exclusive of external works, contingencies, supporting infrastructure, fees, VAT, finance charges etc.

<sup>2</sup> GVA, or gross value added, is the measure of the value of goods and services produced in an area, sector or industry.

<sup>3</sup> Figures over a ten-year time-frame are provided as net present value estimates.





# Rigby Estate

Rigby Estate LLP own and control significant agricultural and commercial landholdings amounting to 810 ha of land across a number of estates within England including the Dunston Estate, Staffordshire.

Sustainable stewardship is a critical and defining value the Estate holds. The Estate has significant history in optimising the land for the generation of clean, renewable energy including the delivery of solar farms, bio-mass plants and as part of these operational developments we focus on ensuring wider environmental benefits arise from the development.

At Dunston Estate we would utilise our experience and supply chains to devise a genuinely sustainable new settlement capable of benefiting from local renewable energy sources.







A Sustainability Focused Strategic Location for Growth  
for South Staffordshire and the West Midlands.



DUNSTON  
GARDEN VILLAGE



## Appendix 2 – Vision Document (December 2019)

Rigby Estates LLP

Cumbria - Lancashire - Staffordshire



# DUNSTON GARDEN VILLAGE

## VISION DOCUMENT

DECEMBER 2019



**fwp**

**TEP** | THE ENVIRONMENT PARTNERSHIP

**MDS Transmodal**

**Weetwood**

**Pegasus**  
Environment

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## EXECUTIVE SUMMARY

This Vision Document has been prepared on behalf of Rigby Estates LLP to support the allocation of a new Garden Village at Dunston, which has the opportunity to provide a sustainable community of up to 3,000 new family and affordable homes, 7.8 hectares of employment floorspace, 4 hectares of retail, leisure and community uses, a new school and a new railway station; within a high quality and visually attractive setting.

The site extends over approximately 160 hectares and is located around the village of Dunston, which lies between Stafford and Penkridge, with direct access to the A449, M6 motorway, and the West Coast Mainline. This document sets out the vision for the site to support its promotion through the South Staffordshire Local Plan Review, where it has been identified within an area of search for a new settlement.

The case for allocating this land for a Garden Village within South Staffordshire's Local Plan is clearly presented within this Vision Document. The allocation of this site will deliver much needed housing and employment floorspace along with supporting services in a truly sustainable community that will make a significant contribution to the future growth needs of South Staffordshire both in the emerging plan period and beyond.

The notion of Garden Cities was first established by Ebenezer Howard in 1898, leading to the creation of 30 Garden Cities in England between 1903 and 1967. Over the past decade, this movement has seen a resurgence amongst both the national government and development industry, with new settlements rooted in Garden City Principles seen as a key solution to the housing crisis in Britain, with over £21 million in Government funding committed to 48 Garden Village and 15 Garden Town schemes since 2017.

The current government guidance confirms that a Garden Community should have the following characteristics:

- a purpose built new settlement, or large extension to an existing town;
- a community with a clear identity and attractive environment;
- it provides a mix of homes, including affordable and self-build; and
- planned by local authorities or private sector in consultation with the local community.

In addition to housing it should also develop:

- job opportunities;
- attractive green space and public realm areas;
- transport infrastructure, including roads, buses and cycle routes;
- community infrastructure, schools, community and health centres; and
- a plan for long-term stewardship of community assets.

## KEY FACTS

Site Name: Dunston Garden Village

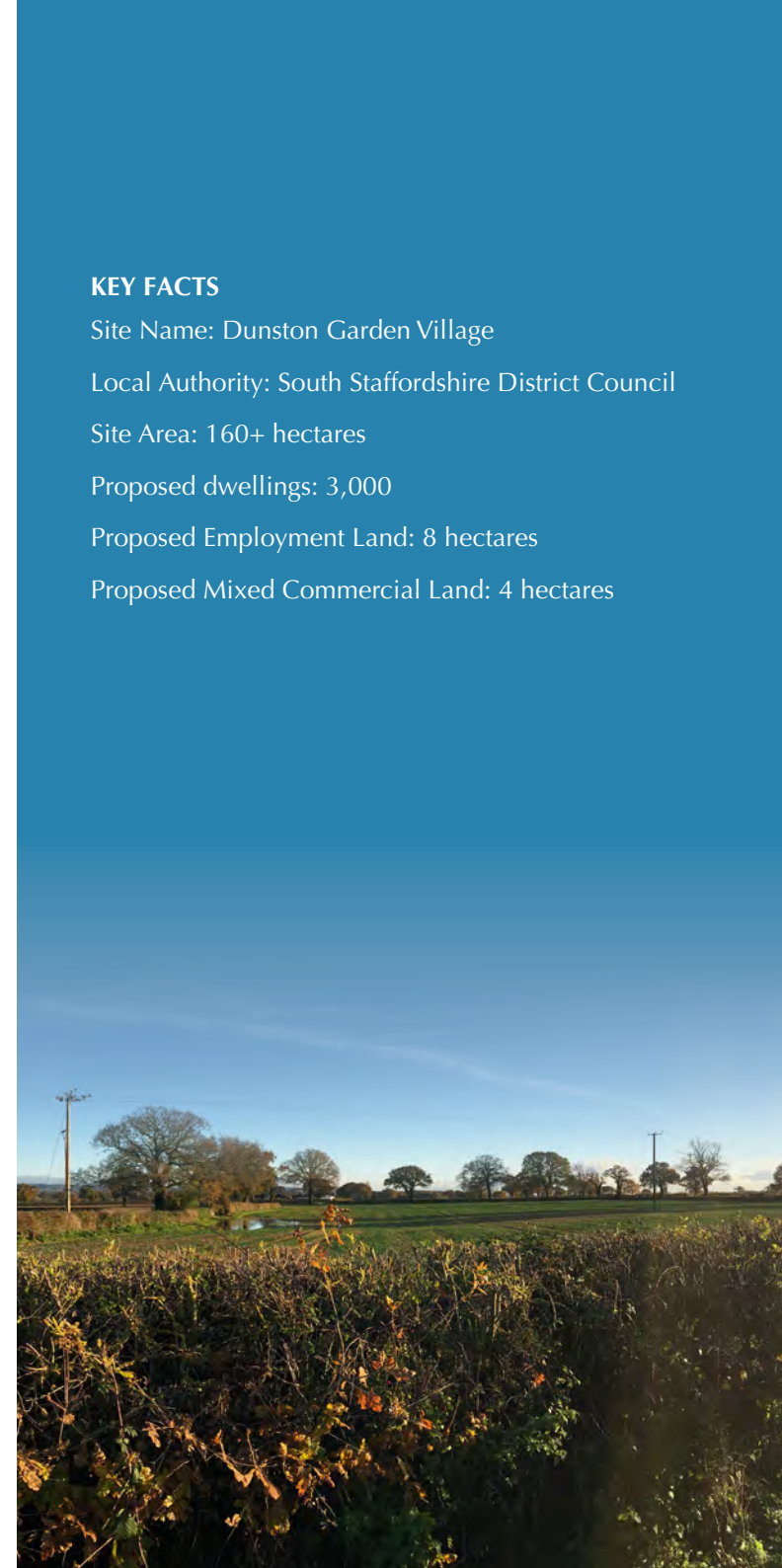
Local Authority: South Staffordshire District Council

Site Area: 160+ hectares

Proposed dwellings: 3,000

Proposed Employment Land: 8 hectares

Proposed Mixed Commercial Land: 4 hectares



1

# INTRODUCTION



## VISION

- 1.1 The land at the Dunston Estate presents an excellent opportunity to develop 160 hectares of land to deliver a high quality and sustainable Garden Village which will meet the future housing and employment needs of South Staffordshire as well the wider Greater Birmingham region.
- 1.2 The vision for the site is to develop a landscape led masterplan that complements the surrounding site context, creating a high quality walkable neighbourhood that upholds Garden Village principles including tree-lined streets, connectivity with local services, generous open spaces and wildlife corridors.

- 1.3 To support the vision, this document clearly articulates the unique opportunity presented by this site and the factors that make it the most suitable location for new settlement within the Council's area of search, which include:
  - Single ownership by the Rigby Estate which eliminates land assembly issues and associated delays;
  - Location outside the Green Belt, which covers 80% of South Staffordshire and all the other areas proposed for a new settlement;
  - The lack of any environmental designations that would prevent this land coming forward for development, as the areas of Flood Risk within the site can be integrated with the proposed masterplan with minimal impact;
  - The opportunity to provide a new railway station on the West Coast Mainline;
  - Proximity to the national motorway network, via the M6, making this a highly accessible and desirable location for employment uses particularly distribution and warehousing;
  - Discreet topography and landscape features which will allow the proposals to integrate with the existing landscape in a sensitive way, maintaining key views and providing generous areas of open space;
  - The opportunity to address affordability issues within Dunston, which is one of the most unaffordable settlements in the district;
  - The Rigby Estate's core values align with Garden Village principles, with a genuine motivation and ethos to deliver a lasting positive legacy for the site and local area; and
  - A commitment by the landowner to invest in the site and undertake the technical work required to demonstrate site's suitability.



The background features a repeating pattern of hexagons. The left half of the image is a solid blue color with a 3D effect where the hexagons appear to be raised. The right half is white with a subtle 3D effect where the hexagons appear to be recessed.

**2**

## **SITE CONTEXT**



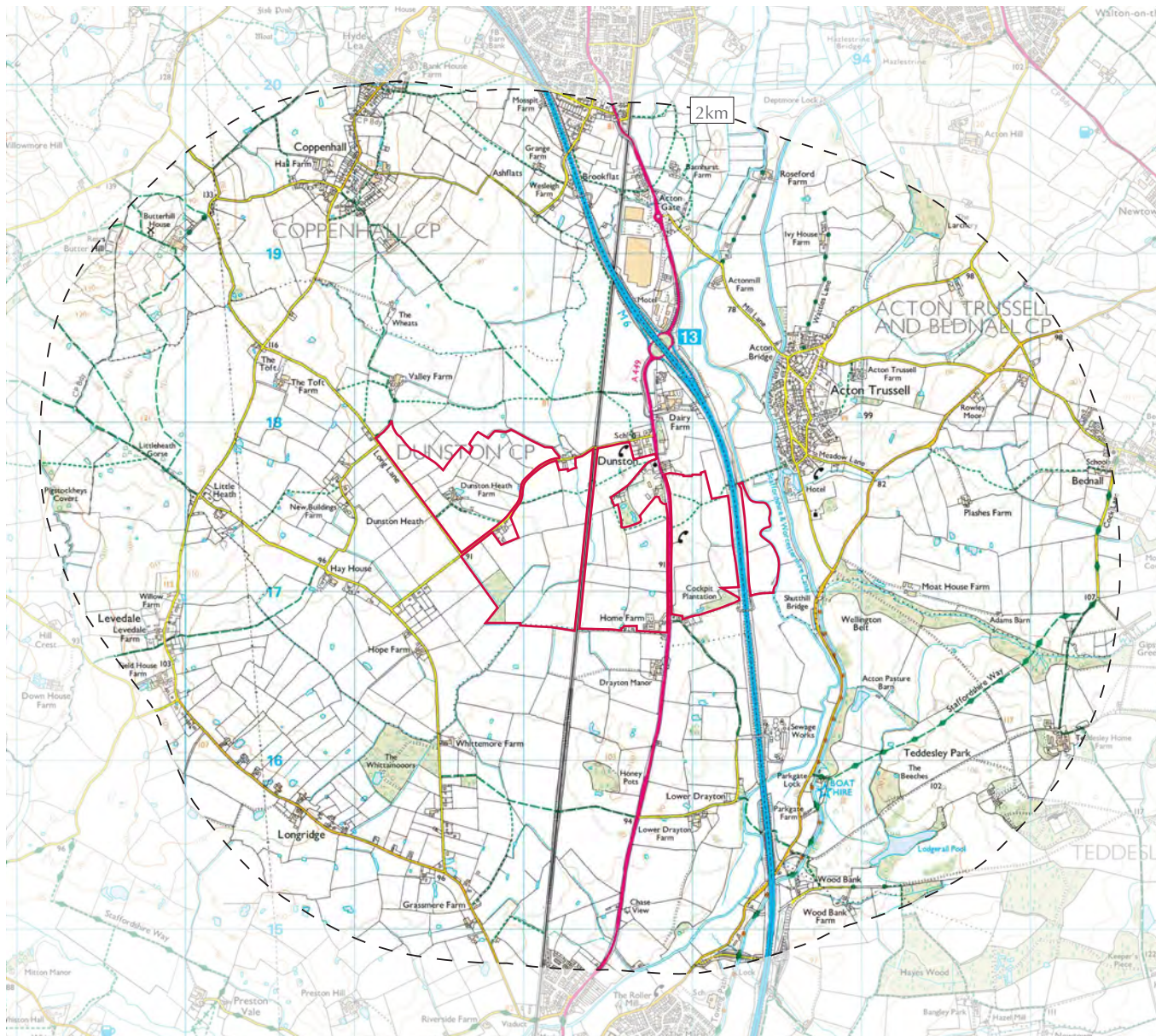


Figure 1: Site Location

## SITE CONTEXT

- 2.1 The land at Dunston Estate is located to the south of the existing village of Dunston, which is located to the south of Stafford and to the north of Penkrige. This is an ideal location for a new settlement given its close proximity to the A449, junction 13 of the M6 and the West Coast Mainline.





## THE SITE

- 2.2 The site comprises over 160 hectares of open countryside which abuts the southern and western edge of the settlement of Dunston. The site is surrounded by open countryside to the north, west and south. To the east of the site is the River Penk and the Staffordshire and Worcestershire Canal. Beyond the eastern boundary is the settlement of Acton Trussell. The south western boundary is comprised of Long Lane and the southern boundary is made up of agricultural field boundaries, Swan Lane and a minor access road. The northern boundary is made up of School Lane and agricultural field boundaries.
- 2.3 This site is made up of undeveloped agricultural land which contains a number of farm buildings located both within the red line boundary of the site and on the edge of the site boundary. The existing development located along School Lane (ribbon residential development and farm buildings), Swan Lane (agricultural buildings) and

the A449 (Bovis Homes offices) will be retained and incorporated into the proposed development of the site.

- 2.4 Pothooks Brook runs through the site, starting on the western side of the site and crossing under the West Coast Mainline to the eastern part of the site. There are a small number of existing ponds within the site boundary.
- 2.5 This land holding is dissected by a number of key infrastructure assets, including; the West Coast Mainline, the A449 and the M6 motorway. The West Coast Mainline runs north to south through the site and divides the Garden Village in half. School Lane forms part of the northern boundary of the site with a bridge crossing over the railway line. School Lane then runs in a south westerly direction and runs through the proposed Garden Village area. School Lane is the only existing made road within the site.

- 2.6 The A449 runs parallel with the West Coast Mainline but is located towards the eastern section of the site. The M6 also runs north to south through the eastern section of the site, resulting in a parcel which is bound by the River Penk and the M6 and somewhat isolated from the rest of the development.
- 2.7 The site comprises a mixture of Flood Zone 1, 2 and 3 land. The majority of the land holding is located within Flood Zone 1, with the Flood Zone 2 and 3 land located along the West Coast Mainline and to the south of School Lane. There are no listed buildings located within the red line boundary.
- 2.8 The site is not located within a Conservation Area or SSSI, but Cannock Chase (a Special Area of Conservation) is located 8km from Dunston Heath



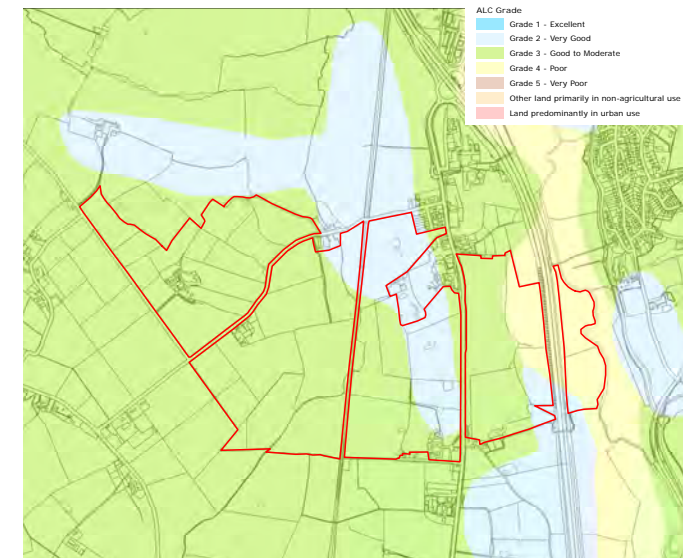




Figure 2: Site Context Plan

Farm, and therefore the landholding falls within the 15 km zone of influence. Having said that, this applies to the vast majority of land proposed for development within South Staffordshire.

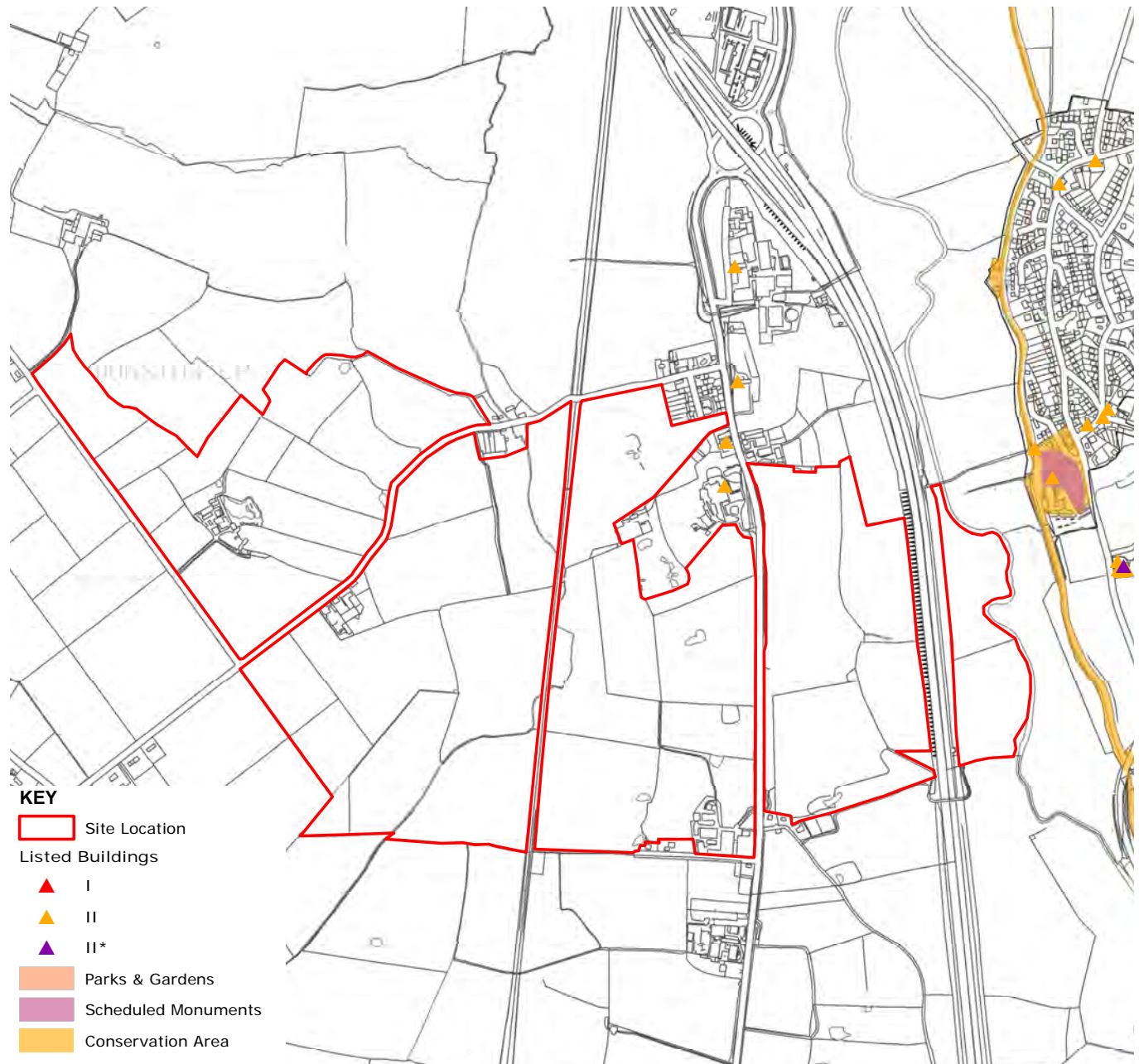
- 2.9 High level agricultural mapping suggests that the Garden Village is a mix of Grade 2 (very good), Grade 3 (good to moderate) and Grade 4 (poor) agricultural land. The majority of the land is Grade 3 agricultural land, albeit it is unclear how much of this is grade 3a (and therefore classed as Best and Most Versatile).
- 2.10 The entirety of the proposed Garden Village is within a single landholding, namely the Rigby Estate LLP, and is being promoted by FWP and other supporting consultants to meet the future development needs of South Staffordshire.





## SURROUNDINGS

- 2.11 The land in the Dunston estate is located to the south of the existing village of Dunston. Dunston is a small village comprising of 281 inhabitants according to the 2011 census. The village comprises of a primary school (St Leonard's Church of England First School), Dunston Village Hall, Dunston St Leonard Church, Dunston House and the Bovis Regional Office.
- 2.12 The land is designated as open countryside and is not located within the Green Belt. This is a significant benefit of the site, considering that approximately 80% of the District is made up of Green Belt land, including the other site's proposed for a new settlement.
- 2.13 As such it is the only candidate site for a new settlement that is not located within the Green Belt.
- 2.14 The existing settlement of Dunston is characterised by a mix of semi-detached and detached properties, including some single storey dwellings.
- 2.15 There are a several Grade II listed buildings in the settlement of Dunston including the Grade II Dunston Farmhouse, Grade II Dunston House, Grade II Church of St Leonard, Grade II Former Stable Block, albeit no higher grade buildings. There are also Scheduled Ancient Monuments at Moat House Farm Moated Site, just east of the site beyond the river Penk, and the Hay House Moated site approximately 750m west of the site.

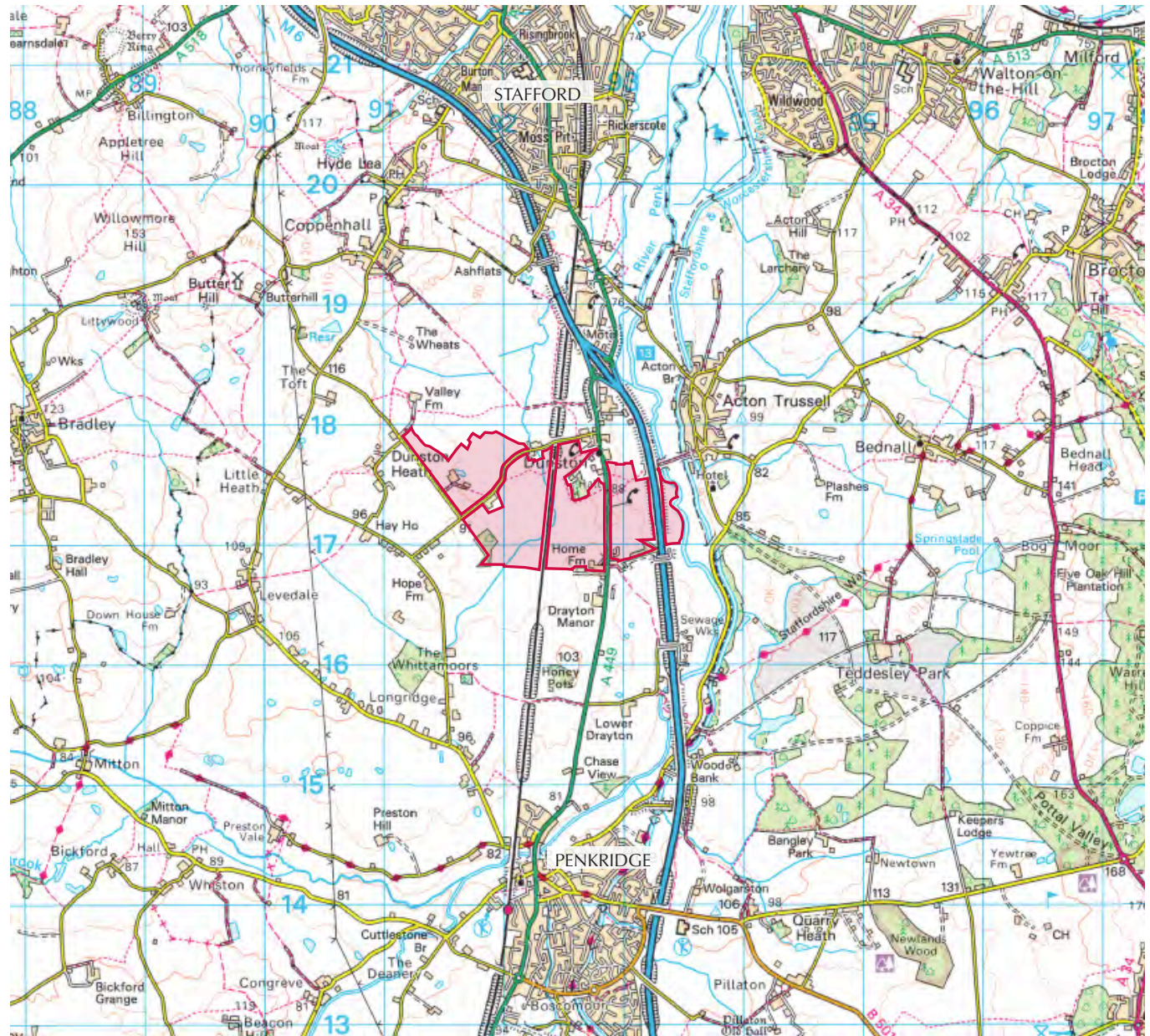




2.16 Dunston is located on the western side of the A449 trunk road, in close proximity to Junction 13 of the M6 motorway, and approximately 3km south of the urban area of Stafford and 5 km south of Stafford Town Centre.

2.17 The site is closer to the market town of Penkrige, approximately 3.5km to the south, which has a wider retail and employment offer. Penkrige offers a range of services and facilities, including; cafés, pubs, restaurants, take-aways, market, library, sports centre, dentist, doctors surgery, hotel etc. Penkrige also is well connected in terms of access to rail services. Penkrige rail station is on the Birmingham branch of the West Coast Mainline, with links to Wolverhampton, Birmingham, Stafford, Crewe, Liverpool Lime Street and London Euston. On weekdays, there are two trains per hour southbound and one northbound, with some additional services during the peak hours and an hourly service each way on Sundays.

2.18 Stafford has a population of over 68,000 residents as per the 2011 census and is the County Town, with a higher level of services and facilities to those offered in Penkrige, including; leisure centres, hotels, casinos, hospitals, colleges as well as a larger range of national supermarkets and other multiple retailers. Stafford Railway Station is approximately 4.5km to the north which offers additional services to London, Manchester, Bristol, Reading and other destinations.





- 2.19 The majority of bus stops that are within the site are located along the A449, which cuts through the site parcels. Dunston Hall bus stop is served by the National Express no 54 which has hourly services to Wolverhampton and Stafford, whilst the Arriva no 75 provides hourly services to Cannock and Stafford.
- 2.20 In respect of the road network the site is directly adjacent to Junction 13 of the M6 and therefore has strong links with the national road network, whilst the A449 is one of the key north/south routes through the district linking to Wolverhampton. As such, in strategic terms, the site has excellent accessibility to the national road network, with realistic opportunities to improve public transport links, as addressed later in this document.

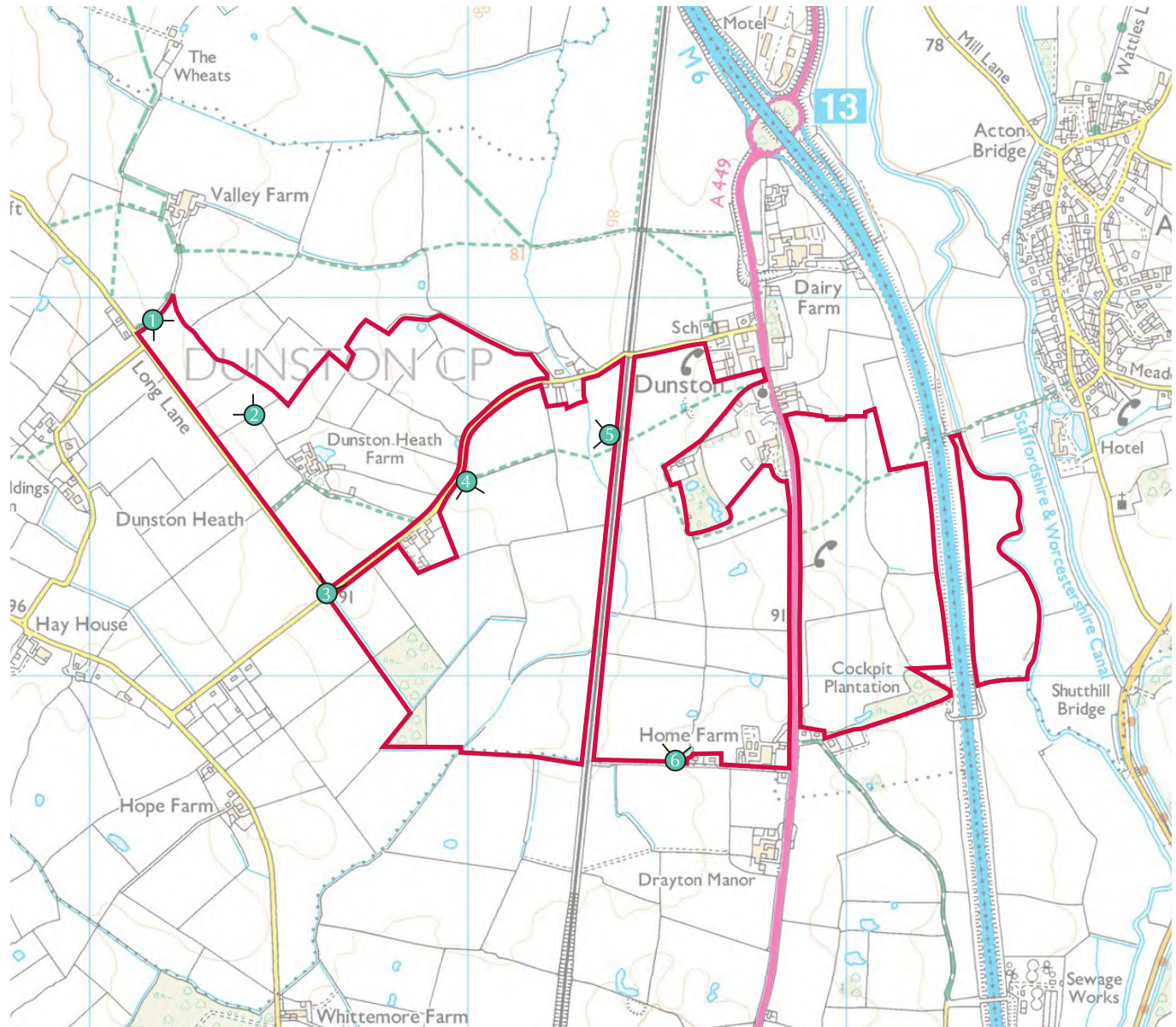


Figure 3: Internal site viewpoint location plan





1 - VIEW LOOKING SOUTH EAST FROM NORTH WEST CORNER OF SITE



2 - VIEW LOOKING NORTH WEST NEAR DUNSTON HEATH FARM









5 - VIEW WEST FROM RAILWAY FOOTBRIDGE IN NORTHERN AREA OF THE SITE



6 - VIEW LOOKING NORTH FROM SWAN LANE

The background features a repeating pattern of hexagons. The left side of the image is a solid light blue color with a 3D effect where the hexagons appear to be raised. The right side is white with a subtle 3D effect where the hexagons appear to be recessed. The number '3' is positioned in the upper right quadrant of the white area.

**3**

# **PLANNING POLICY**



## NATIONAL PLANNING POLICY

3.1 The National Planning Policy Framework (NPPF) was originally published in 2012 and revised in February 2019. This framework sets out the government's core objectives for the planning system, including the need for local planning authorities to identify a sufficient amount and variety of land for development, to significantly boost the supply of housing.

3.2 Delivering a Garden Village at Dunston would be consistent with the core objectives of the NPPF because:

- It would meet the three pillars of sustainable development by delivering economic, social and environmental benefits (NPPF paragraph 8);
- It would be entirely consistent with the presumption in favour of sustainable development, which is at the heart of the Framework, given its location outside the Green Belt and the high levels of housing need within the district and wider sub region (NPPF paragraphs 10 and 11);
- It would make sufficient provision for housing, employment, retail and leisure uses (NPPF paragraph 20);
- It would significantly boost the supply of homes and provide a developable site that is suitably located, available and viable (NPPF paragraphs 59 and 67);
- It will provide a wide range of market and affordable housing of various types and tenures promoting mixed and inclusive communities (NPPF paragraph 61);
- It would supply large numbers of new homes, through a new settlement, which is well located, designed and supported by infrastructure and accessible facilities (including a railway station and local centre) in line with Garden City principles (NPPF paragraph 72);
- It has been identified as a suitable location for such a settlement by a strategic policy making authority for the delivery over the longer term, ensuring that expectations on delivery are realistic (NPPF paragraph 72);
- It has considered transport issues at an early stage and made the most of existing transport infrastructure which can be improved to accommodate the proposed development (NPPF paragraph 102);
- It would promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions (NPPF paragraph 117); and
- It would make use of land which is not currently designated as Green Belt and provides a reasonable alternative to meeting the identified housing and employment land (NPPF paragraph 137).



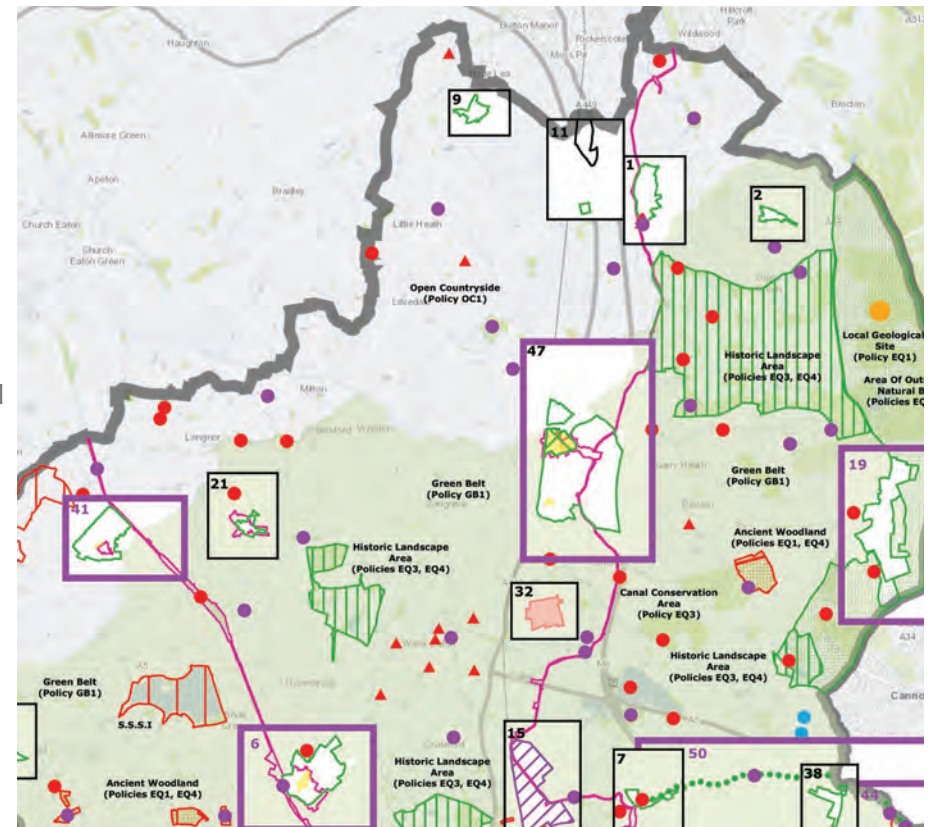
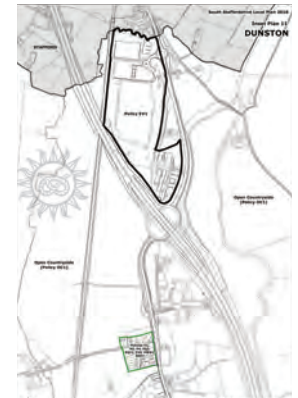
## LOCAL PLANNING CONTEXT

### SOUTH STAFFORDSHIRE CORE STRATEGY

- 3.3 The Development Plan comprises the South Staffordshire Core Strategy, which was adopted in December 2012, followed by the Site Allocations DPD, adopted in September 2018. Both documents cover the period 2006-2028.
- 3.4 Core Policy 6 outlines that at least 3,850 dwellings will be delivered in South Staffordshire during the plan period which equates 175 dwellings per annum. Core Policy 1 designates Dunston as a small service village which forms the third of four tiers within the settlement hierarchy. Within these villages, there is an emphasis on limited infill development for the provision of rural affordable housing and employment that supports a local need.
- 3.5 The site is located within the open countryside which is designated under Policy OC1. In accordance with this policy, new development must be small scale and preserve the character of the open countryside.
- 3.6 Policy EQ2 states that to protect the Cannock Chase Special Area of Conservation (SAC), development within the Zone of Influence must be given special consideration to the provision of Suitable Alternative Natural Greenspace (SANG). This guidance is taken from the Cannock Chase Visitor Impact Strategy (2010). The Dunston estate is located within the Zone of Influence as is the vast majority of the authority.

### SOUTH STAFFORDSHIRE SITE ALLOCATIONS DOCUMENT

- 3.7 This document made further allocations to meet the residual housing and employment need in this plan, in line with the distribution strategy from the Core Strategy, which did not support development in lower tier settlements such as Dunston.
- 3.8 However, this document includes Policy SAD1 which committed the Council to an immediate review of the Local Plan to be submitted for examination by the end of 2021. This was required to address a number of matters, including increased development needs within South Staffordshire itself, as well as unmet needs across wider Greater Birmingham Housing Market Area (GBHMA), which is estimated to total more than 60,000 dwellings by 2036.





## GREATER BIRMINGHAM HMA STRATEGIC GROWTH STUDY

- 3.9 This evidence base document was published in February 2018 and looked at potential strategic growth opportunities to meet this high level of housing need across the 14 authorities that make up the Greater Birmingham Housing Market Area (GBBCHMA), which includes the Black Country and parts of Worcestershire, Warwickshire and Staffordshire.
- 3.10 This study identified 10 areas of search beyond the Green Belt, with 3 within South Staffordshire, including urban extensions North of Penkrige (1) and South of Stafford (3) and a 'new settlement' at Dunston (2).

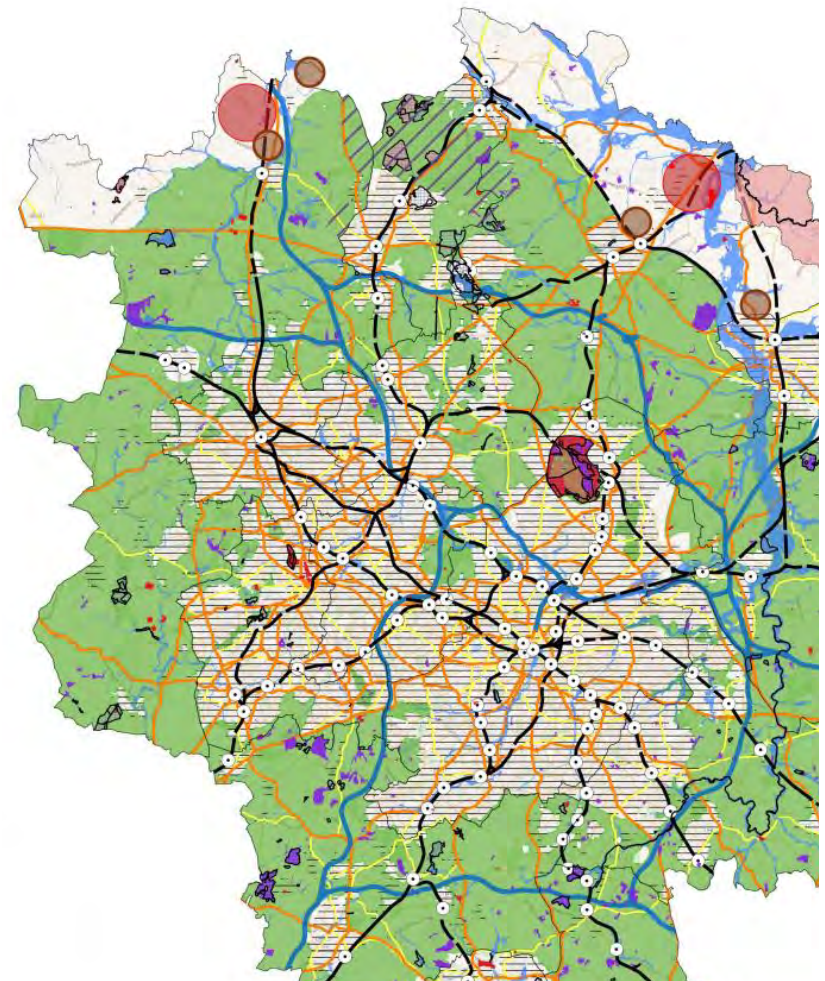
- 3.11 In respect of Dunston it notes the following:

*"This is an area where a large volume of land is available...which is relatively free from nationally significant constraints and policy designations. There are two Ancient Scheduled Monuments and a small area situated within Flood Zone 3. The area is situated within the Cannock Chase SAC 15km Zone of Influence, however subject to further investigation the potential impacts of development on the SAC could be mitigated. Aside from these, the area is free from constraints.*

*It is within close proximity to a rail corridor (Birmingham-Stafford Line) - albeit the nearest station is at Penkrige - and is close to Junction 13 of the M6, supporting potential for residential as well as employment development.*

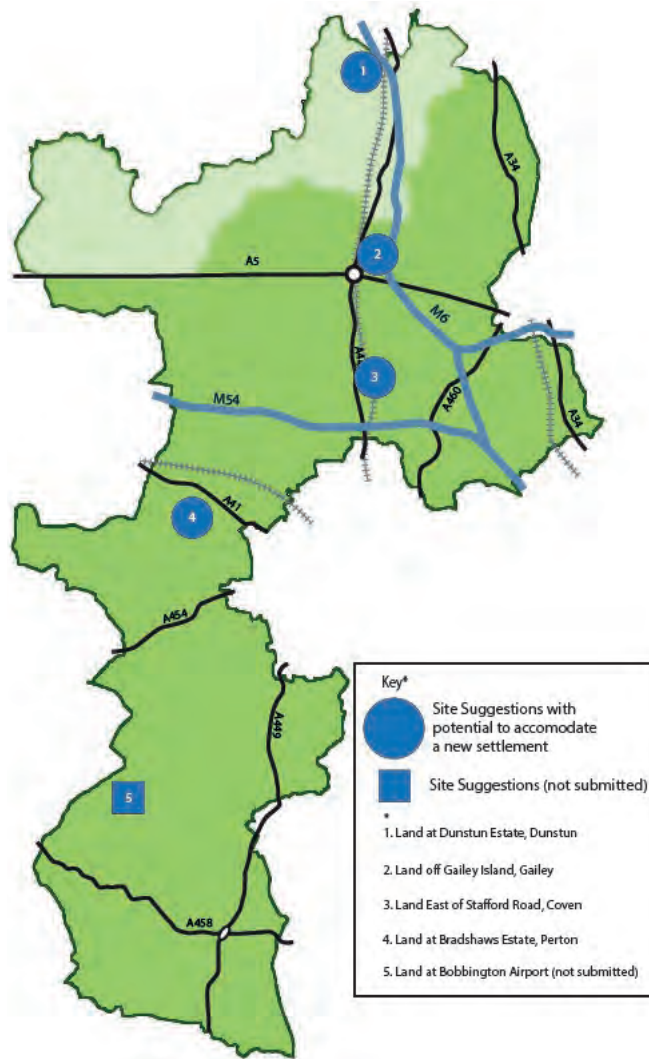
*the area around Dunston is in relatively close proximity to the larger settlements within the District beyond the Green Belt – Penkrige and Acton Trussell; as a result a new settlement in this area of the District would not be out of keeping with the existing settlement pattern; in contrast to the north west of the District which is largely absent from existing settlements, facilities and strategic transport infrastructure."*

- 3.12 So whilst this was only an evidence base document which did not actually allocate sites, it was undertaken at a strategic level and indicated that Dunston was potentially suitable for a new settlement to meet future needs across the wider GBBCHMA area.



## EMERGING LOCAL PLAN

- 3.13 South Staffordshire began the Local Plan Review in October 2018, consulting on 'Issues and Options' document which proposed an increased housing target of 9,130 dwellings over the period 2018-2037, which equated to a basic requirement of 270 dpa plus 4,000 dwellings to address unmet need in the wider HMA.
- 3.14 Within this document, there was an acknowledgment that the Council would have to consider Green Belt release, as Green Belt covers 80% of the borough, with the remainder to the north defined as 'Open Countryside', which includes the land at Dunston.
- 3.15 The Issues and Options document went on to present a suite of different development options, including growing existing settlements (Options A & B), urban extensions to fringes of neighbouring urban areas (Options C & D), increasing densities (Option F) and new freestanding settlements (Option E).
- 3.16 Option E included 5 potential options for a new settlement including:
- 1) Dunston;
  - 2) Gailey Island;
  - 3) Coven (to be employment led);
  - 4) Perton; and
  - 5) Bobbington.

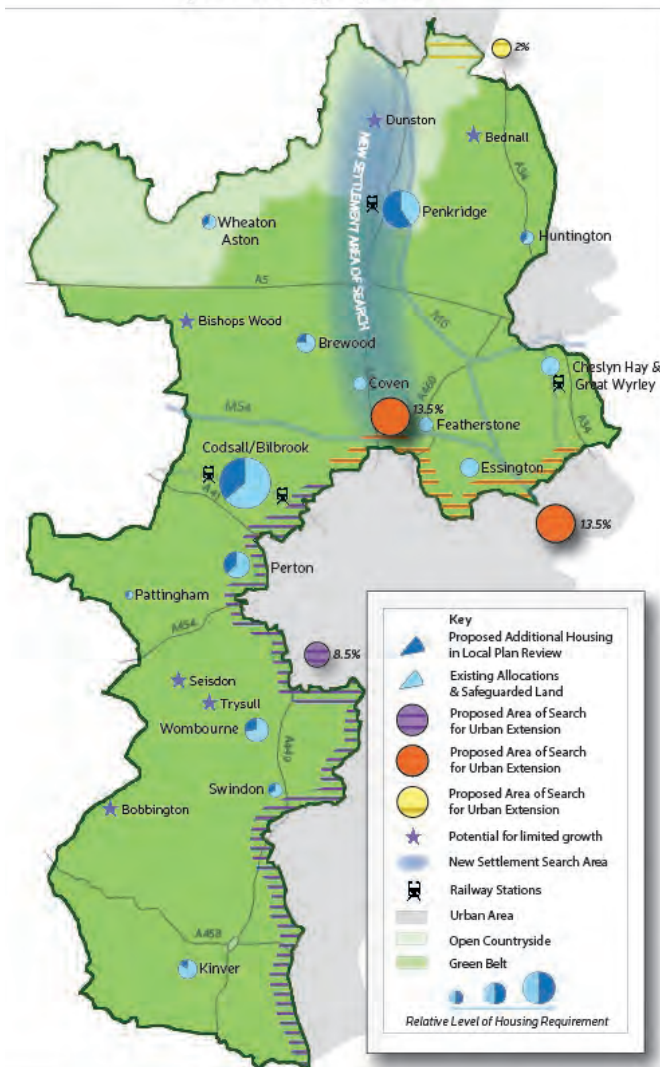


## SPATIAL HOUSING STRATEGY AND INFRASTRUCTURE DELIVERY

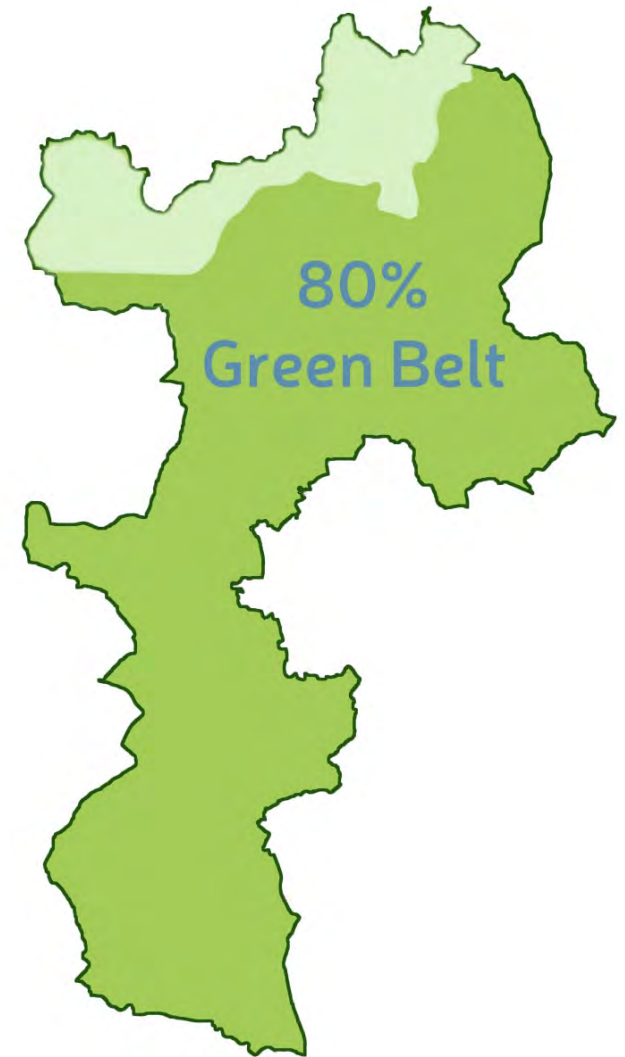
- 3.17 The Council are currently consulting on the second stage of the Local Plan, which focuses on broad locations for housing growth and the infrastructure required to deliver this. The consultation closed on the 12th December 2019.
- 3.18 The Local Authority have made it clear that this consultation is not site specific, but looks at seven different spatial options to deliver the proposed level of growth, which are all hybrids of those higher level options set out at the Issues and Options stage.
- 3.19 The overall requirement has reduced slightly to 8,845 units due to reduction in the local housing need figure generated by the standard methodology, but still includes a commitment to take 4,000 units of the wider unmet need.
- 3.20 Rigby Estates fully support the Council's commitment to addressing needs within the wider area, albeit we question the rationale for the chosen figure of 4,000 dwellings and consider that South Staffordshire has the capacity to take more, and may well be compelled to do so due to supply constraints within many of the other authorities within the wider GBBCHMA.
- 3.21 The Council have identified Option 'G - infrastructure-led development with a garden village area of search beyond the plan period', as their preferred approach, which apportions approximately 60% of development to the district's rural villages, and 40% to urban extensions to neighbouring urban areas.



Spatial Strategy: Option G



- 3.22 Growth to existing villages is focused on the higher Tiers 1 and 2, however it does support growth in lower tier settlements as well, including Dunston, and we fully support this. Part of the rationale for allowing growth lower tier settlements is to address affordability issues and we note that there are high levels of unaffordability within Dunston, with the lower quarter ration at 10.93 compared to the district average of 9.05.
- 3.23 The new settlement area of search does not identify specific sites like the Issues and Options document did but instead focuses on area around the A449 corridor, and the West Coast Mainline, which includes Dunston and the previous options at Gailey and Coven, but omits those at Perton and Bobbington, which are no longer considered viable.
- 3.24 This area of search is included to recognise the potential longer term opportunities for growth in this area to be explored following the plan's adoption, through reviews of the Local Plan or a separate Garden Village Development Plan Document (DPD).
- 3.25 However, it is worth reiterating that Dunston is the only identified site in this area of search that is located outside the Green Belt, meaning it would not necessarily require a further Local Plan review to be released and could potentially come forward sooner.





## OTHER RELEVANT GUIDANCE

### THE NATIONAL DESIGN GUIDE

3.26 The National Design Guide was adopted in October 2019 and addresses the question of how we recognise well-designed places. It forms part of the government's suite of planning guidance and should be read alongside the section 26 of the NPPG and paragraph 130 of the National Planning Policy Framework.

### 10 PRINCIPLES CHECKLIST

3.27 Well-designed places have individual characteristics which work together to create its physical character. The ten principles help to nurture and sustain a sense of community and positively address environmental issues affecting climate, and these are:

- **Context** – An understanding of the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments means they are well grounded in their locality and more likely to be acceptable to existing communities.
- **Identity** - The identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. Well-designed, sustainable places with a strong identity give their users, occupiers and owners a sense of pride, helping to create and sustain communities and neighbourhoods.
- **Built Form** - Built form is the three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces. It is the interrelationship between all these elements that creates an attractive place to live, work and visit, rather than their individual characteristics.

- **Movement** - Patterns of movement for people are integral to well-designed places. They include walking and cycling, access to facilities, employment and servicing, parking and the convenience of public transport. Successful development depends upon a movement network that makes connections to destinations, places and communities.
- **Nature** - Nature contributes to the quality of a place, and to people's quality of life, and it is a critical component of well-designed places. Natural features are integrated into well-designed development.
- **Public Space** - The quality of the spaces between buildings is as important as the buildings themselves. The design of a public space encompasses its siting and integration into the wider network of routes as well as its various elements.
- **Uses** - Sustainable places include a mix of uses that support everyday activities, including to live, work and play. Well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities.



- **Homes and Buildings** - Well-designed homes and buildings are functional, accessible and sustainable. They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences. They are adequate in size, fit for purpose and are adaptable to the changing needs of their occupants over time.
- **Resources** - Well-designed places and buildings conserve natural resources including land, water, energy and materials. A compact and walkable neighbourhood uses land efficiently so helps adaptation by increasing the ability for CO2 absorption, sustaining natural ecosystems, minimising flood risk and the potential impact of flooding, and reducing overheating and air pollution.
- **Lifespan** - Well-designed places sustain their beauty over the long term. They add to the quality of life of their users and as a result, people are more likely to care for them over their lifespan.

## GARDEN COMMUNITIES

- 3.28 In recent years, the Government have placed increasing emphasis on the creation of new ‘Garden Communities’ based on the Garden City movement, with 14 pilot Garden Village schemes announced in 2017, backed by £6 million of government funding. These initial schemes are expected to deliver over 48,000 homes, with 25,000 housing starts expected by 2020.
- 3.29 This funding has been supported by various guidance setting out criteria for different sized Garden Settlements, with those over 10,000+ considered Garden Towns and those between 1,500 and 10,000 home considered Garden Villages, with the initial eligibility criteria noting that such villages should be freestanding, rather than extensions to existing towns (albeit this has document has now been archived).

- 3.30 Whilst Garden Settlements are not specifically referenced in the 2019 NPPF, the government’s commitment to them has been demonstrated by significant further investment in recent years including £9 million to support 21 Garden Villages and Towns in February 2019, £3.7 million for 5 new Garden Towns announced on 25th March 2019, with a further £2.85 million pledged for a further 19 Garden Villages on 28th June 2019; with the latest list confirming that there are 48 active Garden Village schemes and 15 Garden Towns across England.





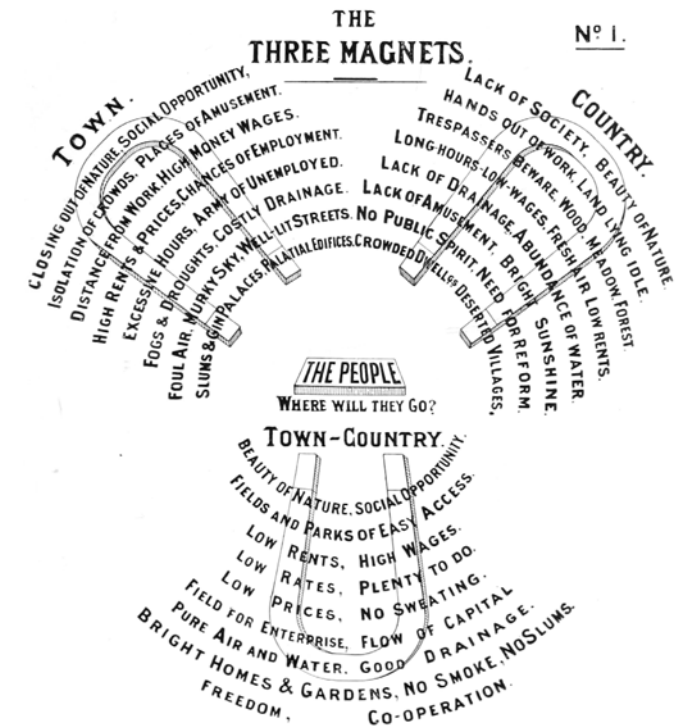
3.31 The father of the Garden City movement, Ebenezer Howard, did not prescribe a definitive set of principles or guidelines for planning new Garden Cities. Whilst a number of 20th century interpretations stand testament to evolving national priorities for design and delivery of large housing projects, it is the qualities of the original developments and the sentiments expressed by Howard, which drive contemporary policy makers and urban designers, such that:

*“The advantages of the most energetic and active town life, with all the beauty and delight of the country, may be secured in perfect combination”.*

3.32 As the ancestor of the Garden Cities Association, the Town and Country Planning Association (TCPA) has reviewed Garden City principles with a view to promoting their use within planning and delivery of new residential development. The TCPA's 2018 report considers lessons learned from previous garden city development including:

- Strong vision, leadership and community engagement;
- Land value capture for the benefit of the community;
- Community ownership of land and long-term stewardship of assets;
- Mixed-tenure homes that are affordable for ordinary people;
- A strong local jobs offer in the Garden City itself, with a variety of employment opportunities within easy commuting distance of homes;
- High-quality imaginative design (including homes with gardens), combining the very best of town and country living to create healthy homes in vibrant communities;

- Generous green space linked to the wider natural environment, including a mix of public and private networks of well-managed, high-quality gardens, tree-lined streets and open spaces;
- Opportunities for residents to grow their own food, including generous allotments;
- Access to strong local cultural, recreational and shopping facilities in walkable neighbourhoods; and
- Integrated and accessible transport systems.





3.33 MCHLG also published a Garden Community Prospectus in August 2018 setting out their concept; and this has been supplemented with a toolkit dated 27th September 2019, which sets out the following checklist:



- **Making a case for a garden community:** To deliver a successful garden community you'll need long-term support, local leadership, partnership and financial backing.
- **Site feasibility:** How to test if there are suitable, available and deliverable locations and sites for a garden community.
- **Developing a vision:** How to successfully guide the development by creating a clear vision for your garden community.
- **Engagement:** Engaging the local community and stakeholders can create a garden community plan with roots in the local context.
- **Planning policy:** Local Plan policies provide an important framework to guide development proposals and aid decision-making for garden communities.
- **Planning permission:** Information about how to develop a planning permission strategy for your garden community.
- **Masterplanning and design:** Masterplanning is integral to creating well-planned and designed garden communities.
- **Innovative and integrated communities:** How smart communities connect people to technology.
- **Infrastructure:** Delivering infrastructure can unlock development of a garden community and provide some of the building blocks for a successful new community.
- **Legacy:** Information about creating long-term maintenance and management arrangements for your garden community.
- **Assessing the viability of your garden community:** Find out about government guidance on viability and how to manage it in your planning process.
- **Land value capture and funding delivery:** The process of capturing some of the increase in land value which comes from policy decisions, the granting of planning permission by local authorities, or as a consequence of new or improved, publicly funded infrastructure projects.
- **Delivery mechanisms:** At an early stage in your project, you should explore the mechanisms and options available for delivery of your garden community.
- **Governance:** Governance creates good collaborative working and effective decision-making among public and private sector partners and stakeholders.
- **Project management:** Strong project management is needed to deliver a complex garden community on time and to ensure it delivers on expectations.



**4**

**LANDSCAPE AND  
VISUAL ANALYSIS**



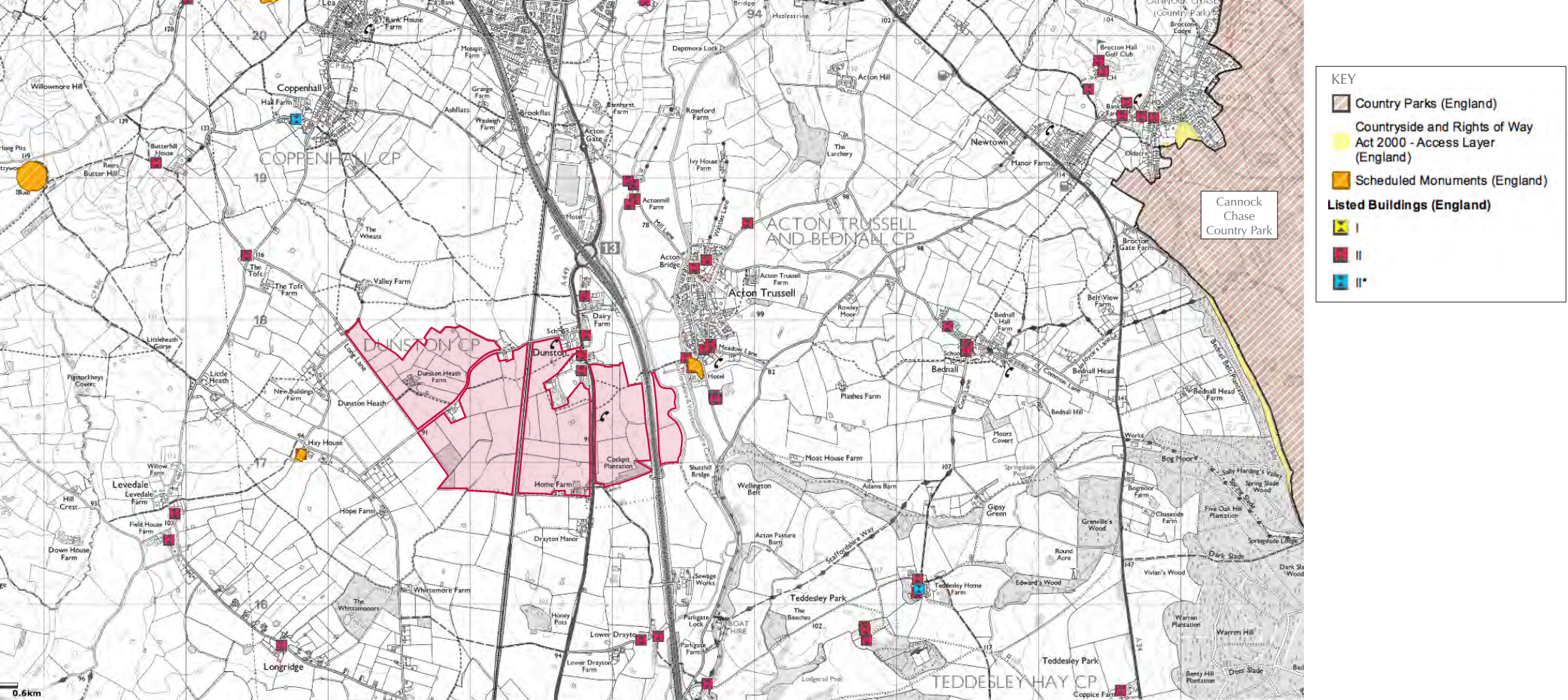


Figure 4: Magic map extract showing nearby designations

## LANDSCAPE CHARACTER ASSESSMENT

4.1 An initial landscape and visual appraisal has been prepared by Pegasus Group to consider the possible effects of the proposed development upon landscape features, landscape character and visual amenity.

4.2 There are no designations covering the site that recognise a particular landscape or visual importance; albeit there are several within the wider locality, including: several Grade II listed buildings in Dunston, a Scheduled Ancient Monument in Acton Trussell, Cannock Chase AONB (located approximately 3.1km to the east of the site) and Cannock Chase Country park (located approximately 3.5km to the east of the site). The site is also located outside the Green Belt.

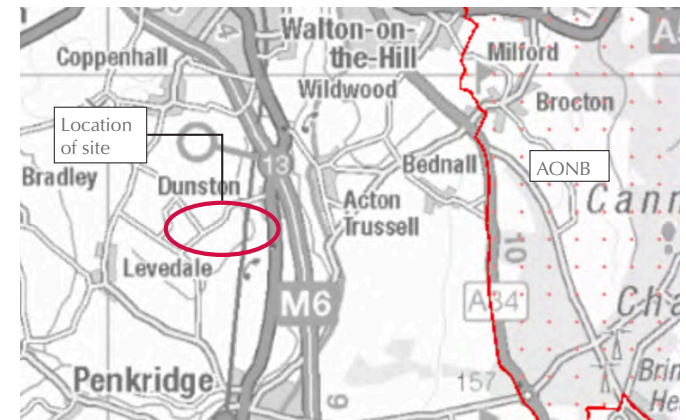


Figure 5: Magic map extract showing location of AONB in relation to site



## LANDSCAPE CHARACTER ASSESSMENT

- 4.3 A baseline study has been undertaken to record the character of the landscape and to highlight any particular sensitivities that should be addressed in the masterplan. The National Landscape Character Assessment gives a broad impression for the region and states that the site falls within National Character Area 61 (Shropshire, Cheshire and Staffordshire Plain).
- 4.4 At County Level, the Staffordshire Landscape Character Assessment sub-divides these regional character areas in to Landscape Character Types (LCT), with this falling within LCT 'Ancient Clay Farmlands'.
- 4.5 Characteristic landscape features include: mature hedgerow oaks and strong hedgerow patterns, narrow winding lanes, small broadleaved and conifer woodlands, well treed stream and canal corridors, farmsteads, conifers, cottages, villages and hamlets of traditional red brick etc; whilst incongruous features include busy main roads and motorways, powerlines, large modern farm buildings, industrial developments, electrified railway line, urban edge, improved and new commuter dwellings etc.
- 4.6 The critical factors which currently limit landscape quality are: the loss of characteristic landscape features (especially hedgerows and hedgerow trees), the poor condition of those features that remain, and the relatively poor survival of characteristic semi-natural vegetation (i.e. ancient woodland and hedgerows, semi-natural grasslands and riparian and wetland vegetation).

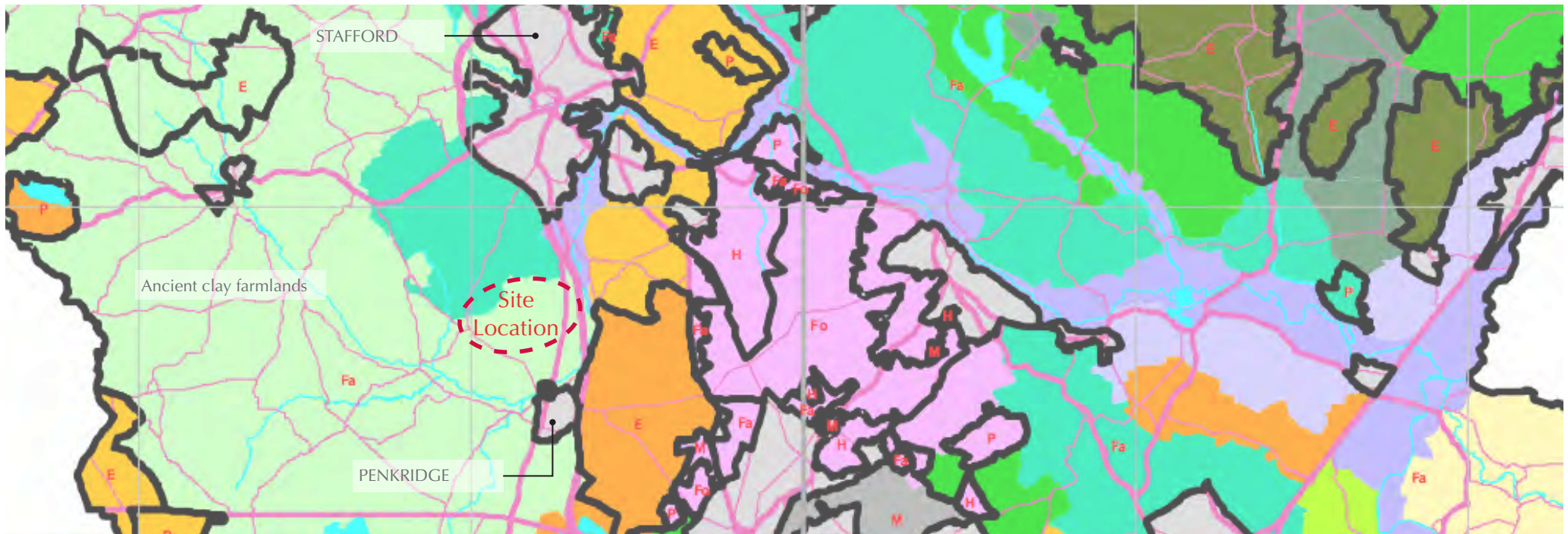


Figure 6: Staffordshire LCT Map extract

## SOUTH STAFFORDSHIRE LANDSCAPE SENSITIVITY ASSESSMENT (JULY 2019)

4.7 The Landscape Sensitivity Assessment (LSA – July 2019) was undertaken by LUC and forms part of the evidence base for the emerging Local Plan. The site falls across the following areas with the following sensitivity ratings:

- SL90 (Moderate- High) – The floodplain character has value from a scenic, priority habitat and historic perspective and provides part of the wider rural setting however the proximity to the M6 limits the area’s sense of rurality and tranquillity;
- SL91 (Low – Moderate) – The area has a low – moderate overall sensitivity due to its location between busy roads and limited valued natural features;
- SL92 (Moderate) – The area has a moderate sensitivity due to a combination of its location in close proximity to the busy A449, M6 and railway line, the flat topography, small/medium scale fields and frequent intact hedgerows and trees; and
- SL93 (Moderate) – The area has a moderate sensitivity due fields which are moderate to small scale, flat topography, some 20th century field enlargements and some public rights of way. The M6 is visible and audible in the distance and this is not a visually prominent area.

4.8 The sensitivity assessments given to the areas discussed generally align with our own assessments of this site.





## VISUAL BASELINE

- 4.9 Visibility of the site within the local area is fairly limited in most directions due to a combination of features including existing built form, vegetation and topography, and this can be seen in the 'Screened Zone of Theoretical Visibility (SZTV)' (see Figure 7) which shows the areas where the site is visible from.

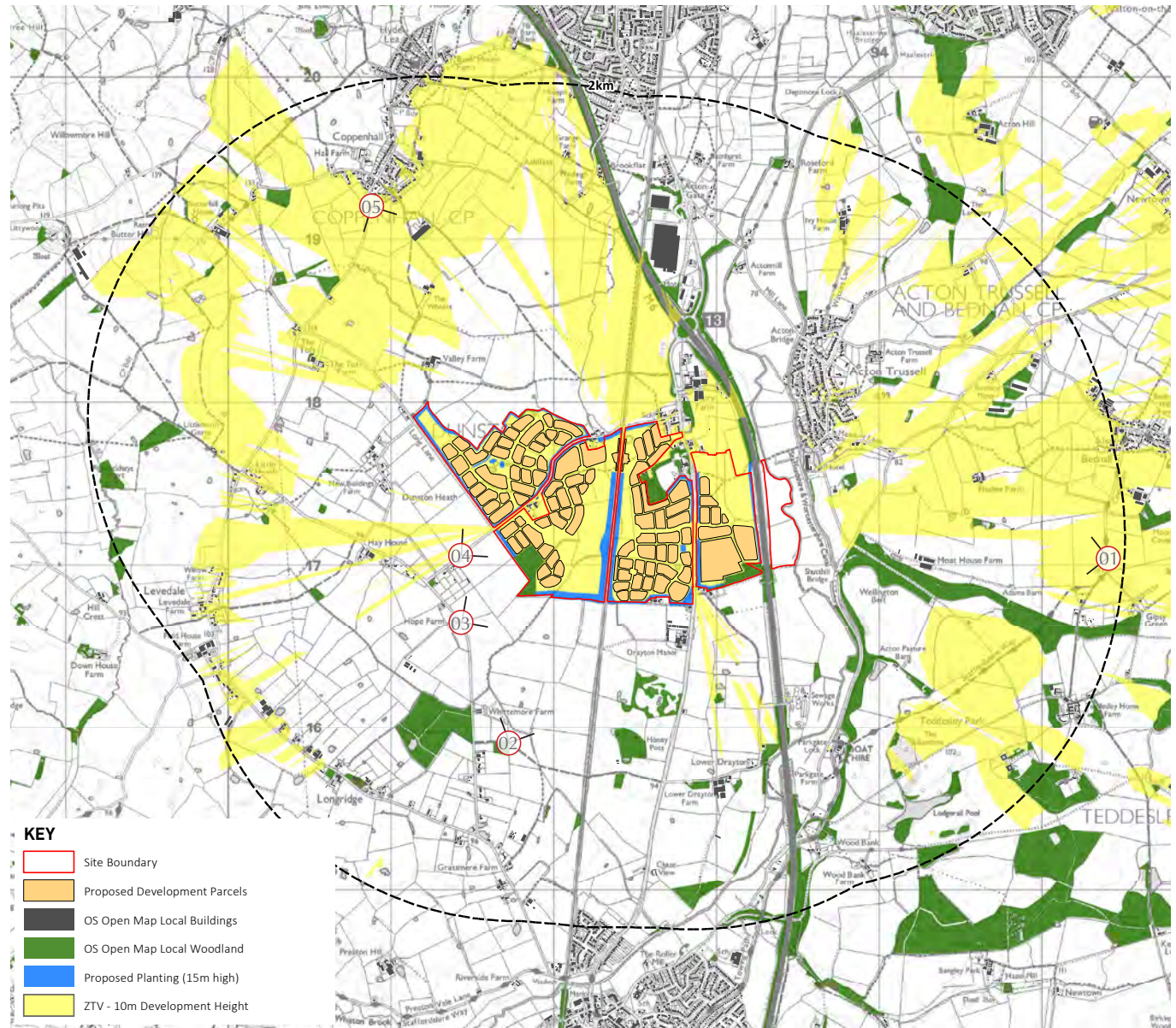


Figure 7: SZTV and viewpoint locations





Viewpoint 01 : View looking west from Cock Lane and the Staffordshire Way



Viewpoint 02 : View looking north east from Footpath Penkridge 33 south east of Whittemore Farm



### VIEWS FROM THE LOCAL ROAD AND RAIL NETWORK

4.10 Views from the local road network vary considerably depending on their proximity to the site and their character. That said, the views from any of the local roads which are considered highly sensitive are screened by hedgerows, trees and hedge banks; whilst views from the M6 and railway line, which are much more open, are considered less sensitive; ensuring the impacts on these receptors are not significant.

### VIEWS FROM PUBLIC RIGHTS OF WAY (PROW)

4.11 Overall, the sensitivity of users of PROW is considered to be high; however views from the public rights of way network in this location vary considerably. There are public footpaths surrounding the site and several pass through it and therefore it is inevitable that receptors will experience views of the development at close range; however there are opportunities to mitigate this over longer range views through mature tree planting along field boundaries, particularly to the north west of the site.

### VIEWS FROM RESIDENTIAL RECEPTORS

4.12 Sensitivity from residential receptors is also considered to be high; whilst there is significant variation again in terms of views from existing properties in this location, which are generally grouped in small clusters or on scattered farmsteads.

4.13 Generally, properties within Coppenhall and Acton Trussell are less likely to experience views of the site however properties on School Lane, Whittamore Lane, Stoney Lane, Long Lane and some of the unnamed roads will experience views of the development.



Viewpoint 03 : View taken from a gap in the hedgerow on Whittemore Lane looking north east adjacent to Hope Farm





Viewpoint 04 : View looking north east along School Lane



Viewpoint 05 : View looking south east from the edge of Coppenhall on Footpath Coppenhall 9(a)



**5**

# **THE DESIGN CONCEPT**

## VISION

- 5.1 The design theory for the site builds upon good practice for design as set out in the National Design Guide (October 2019) the site assessment, evaluation and masterplan evolution.
- 5.2 The development at Dunston has the opportunity to deliver a high quality development underpinned by the principals of the Garden City, creating a new 'Dunston Garden Village'. The concept can be summarised as:
- Delivering a Garden Village based upon the key Garden City principals;
  - Creating modern, high quality sustainable housing to meet changing social needs in an increasingly low-carbon economy;
  - Delivering affordable housing, with a mixture of development to cater for first time buyers, families and older people looking to 'downsize';
  - Introducing new local services and employment opportunities to provide the basis for a strong community with identity and interaction;
  - Delivery of a new commercial / employment zone adjacent to the A449;
  - Delivery of a new train station on the West Coast Mainline (and/or park and ride facilities);
  - Creating a new Local Centre at the heart of the village, including the delivery of a new Primary School; and
  - Two smaller Neighbourhood Centres to serve the more peripheral parcels.
- 5.3 These aspirations align with the Garden City ethos; to provide people of all ages with a living and working community; that it positive, healthy and vibrant; with access to high-quality green spaces and the countryside. The key Garden City principles that underpin the concept for Dunston Garden Village should deliver:
- Retained and enhanced planting and vegetation;
  - Tree lined, landscaped streets;
  - A well planned development structure with clearly defined movement routes through the development;
  - A mix of complementary land uses that are conveniently located within the development proposals;
  - A landscape design approach adopted within the development blocks so that improvements to biodiversity and wildlife settings can be incorporated;
  - High quality homes that aid in creating variety and character to the area, but also provide a mix of homes to cater for the existing communities needs;
  - Strong links to the wider countryside with a harmonious relationship created between the built form and the wider landscape; and
  - Integrated and accessible transport systems, where care is taken over the design of the streets to create attractive routes for pedestrian/cyclist movement.

## SITE OPPORTUNITIES AND CONSTRAINTS

- 5.4 The masterplan for the site is also based on a careful analysis of the opportunities and constraints in the local area. Accordingly, the masterplan seeks to integrate with existing built development, including the village of Dunston and employment development to the north and south of the site, whilst also respecting the surrounding countryside, and overall rural nature of the area.
- 5.5 The site's proximity to road and rail infrastructures presents significant benefits and provides an ideal location for significant future housing and employment growth in the borough and the wider Birmingham region.
- 5.6 The West Coast Mainline (railway line) bisects the site which provides an opportunity to provide a new station which will serve this new settlement and the existing residents of Dunston. This land provides direct access to the railway network and will encourage future residents and employees of the development to opt for sustainable modes of transport as opposed to the car.
- 5.7 The land at the Dunston estate is also bisected by the A449 and M6 motorway over to the western side of the site. The estate's close proximity to Junction 13 of the M6 will provide an ideal location for businesses to locate, given its adjacency and easy access to the national road network; whilst the A449 is also an important north/south route through the district linking to Wolverhampton.
- 5.8 The major roads (M6 and A449) and the railway line also represent amenity constraints to development, and will require acoustic buffers or landscaped stand-offs to safeguard future residents and employees. That said, there is little development proposed adjacent to the railway line or the M6, due to much of this land being set aside for flood attenuation, public open space and green infrastructure; whilst the impacts from the A449 should be lesser given this is a single lane, lower capacity road.
- 5.9 There are some areas of the landholding which are located within Flood Zone 2 or 3 which would limit development in these locations. As shown in the masterplan and supporting flood risk maps, the areas which are at the highest risk of flooding will not be developed and will be used for public open space and green infrastructure, albeit there may be opportunities to increase the developable area in the future if required, through mitigation and engineering measures and this will be explored as the Local Plan progresses.
- 5.10 There is some public access within the site via the existing footpath network, however the development of this Garden Village will provide additional opportunities to create publicly accessible routes through an attractive greenspace network which will be delivered alongside the residential, commercial and employment development. The scheme will also provide enhanced access to the countryside surrounding the proposed Garden Village.



PUBLIC  
FOOTPATH



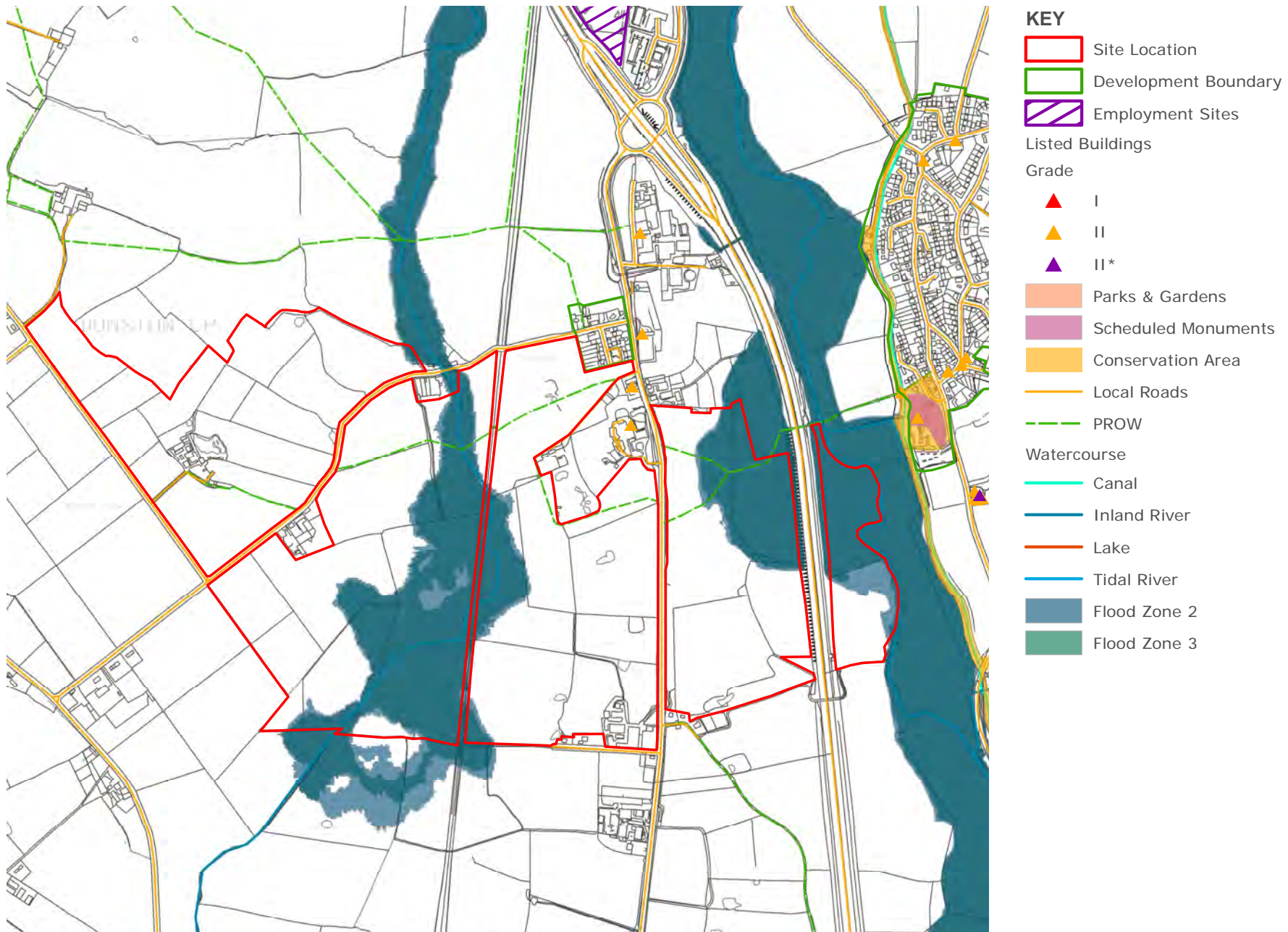


Figure 8: Opportunities and Constraints

## LANDSCAPE FRAMEWORK

- 5.11 The landscape and visual analysis has also set a clear framework for the masterplan, which incorporates a number of recommendations and mitigation features shown on the Landscape Framework Plan.
- 5.12 The most sensitive views are from the north west and therefore the treatment of this boundary is important in mitigating these impacts. As such, a dense and continuous buffer will be included in this location, with a larger block of woodland to the far north to be in keeping with the surrounding landscape. The development parcels have been pulled back in the north western section to allow for a greater transition from development to the countryside.
- 5.13 To the south west of the Garden Village, the large block of existing woodland is retained and enhanced; including tree planting along existing and retained field boundaries. The inclusion of the avenue through the development and the street tree planting will assist in breaking up the mass of development. As the trees mature, the development will appear to be set within woodland.
- 5.14 Planting is suggested, and has been incorporated, along School Lane to help mitigate some views from the existing dwellings as well as adding to the overall leafy character of the site.
- 5.15 Planting along the southern boundary will be incorporated to strengthen where it has been left open. Along this boundary, there is the opportunity to enhance the habitat within the floodplain and introduce some woodland. Additional woodland and a tree belt will be included along the eastern boundary to screen views of the M6 from within the site as well as softening the development edge where there are views of the site from the east.







Landscape Framework Recommendations



## ILLUSTRATIVE MASTERPLAN

5.16 The masterplan illustrates how the site has been designed to ensure that the key objectives and Garden City principles can be met, based on the design concept, site constraints and landscape framework as set out. It shows the following:



Figure 9: Illustrative Masterplan

### Residential:

- A Residential area of 64.25 Ha, which could deliver up to 3,000 dwellings at varied densities, with higher density towards the train station and local centre and other facilities, and lower densities near the landscape sensitive areas at the rural fringe. A mix of densities will allow for different types of dwellings in term of size and tenure, which in turn will accommodate a variety of households. This will provide a hierarchy of dwellings from large detached properties with big plots through to smaller terraced forms allowing for a variety in the proposed streetscape as seen within the local area.
- The main constraint to the developable area is flood risk which influences large areas of the centre and east of the site around the railway line and M6; however the supporting flood risk analysis indicates that this could be increased in the future through mitigation and engineering measures if required.

### Employment:

- An Employment area of 7.8 Ha in the south east corner, separate from the main residential area and with direct connection to the A449. This will assist the sustainability of the settlement by offering employment opportunities within the development itself to reduce out commuting. Demand for such uses is expected to be particularly high within the Warehousing and Distribution sectors (Use Classes B2 and B8) due to its direct connection to the M6 and national road network.





**Potential railway station:**

5.17 A new railway station, with 2 platforms, a shelter and associated parking (measuring 1.5 Ha) is proposed at the centre of the site connecting to the West Coast Mainline, between the existing stations at Stafford and Penkrige. This will further enhance the sustainability of the settlement by increasing access for job opportunities for the existing and future residents via sustainable modes of transport.

This is one of the Council's key aspirations for any new settlement in the borough, and there is a longer-term aspiration for the West Coast Mainline to support more localised rail services if/ when HS2 is complete. An alternative park and ride facility could also be provided for Stafford station, if Network Rail or other key stakeholders determine that a station here is not practicable.





### Neighbourhood Centres:

- 5.18 Two further neighbourhood centres (measuring 2 Ha combined) are shown to the west of the site at the existing Dunston Heath Farm and to the south along the edge of the A449. The provision of smaller local centres will ensure there are local services and facilities within a walkable distance available to all residents within the Garden Village.
- 5.19 The southern centre is proposed for roadside type retail and leisure uses (convenience store, coffee shop, public house); whilst the western centre is proposed as a small Business Village type development with B1 uses mixed with small scale retail.

### Access:

- 5.20 The Garden Village has been designed to create a number of key internal access routes through the village. The access routes have been designed to be tree-lined boulevards with concentric design to maximise connectivity/ permeability through the site, which uphold key garden village principles.
- 5.21 The principal access routes will be via the existing School Lane which will be upgraded and a new east west route further south connecting both east and west parts of the development of the A449.

### Open Space:

- 5.22 The masterplan shows the provision of generous areas of open space (over 35 Ha), which will be mainly located in the centre and east of the site. These areas of public open space will not only serve the development itself, but also the wider community. The open space proposed has the potential to include SANGS areas (suitable alternative natural greenspace). The inclusion of these areas within the Garden Village will reduce visitor pressure on the nearby Cannock Chase SAC. As shown in the masterplan, there are areas within the development (to the east of the M6 and to the west of the train line) which could also be used for ecological enhancement or mitigation.



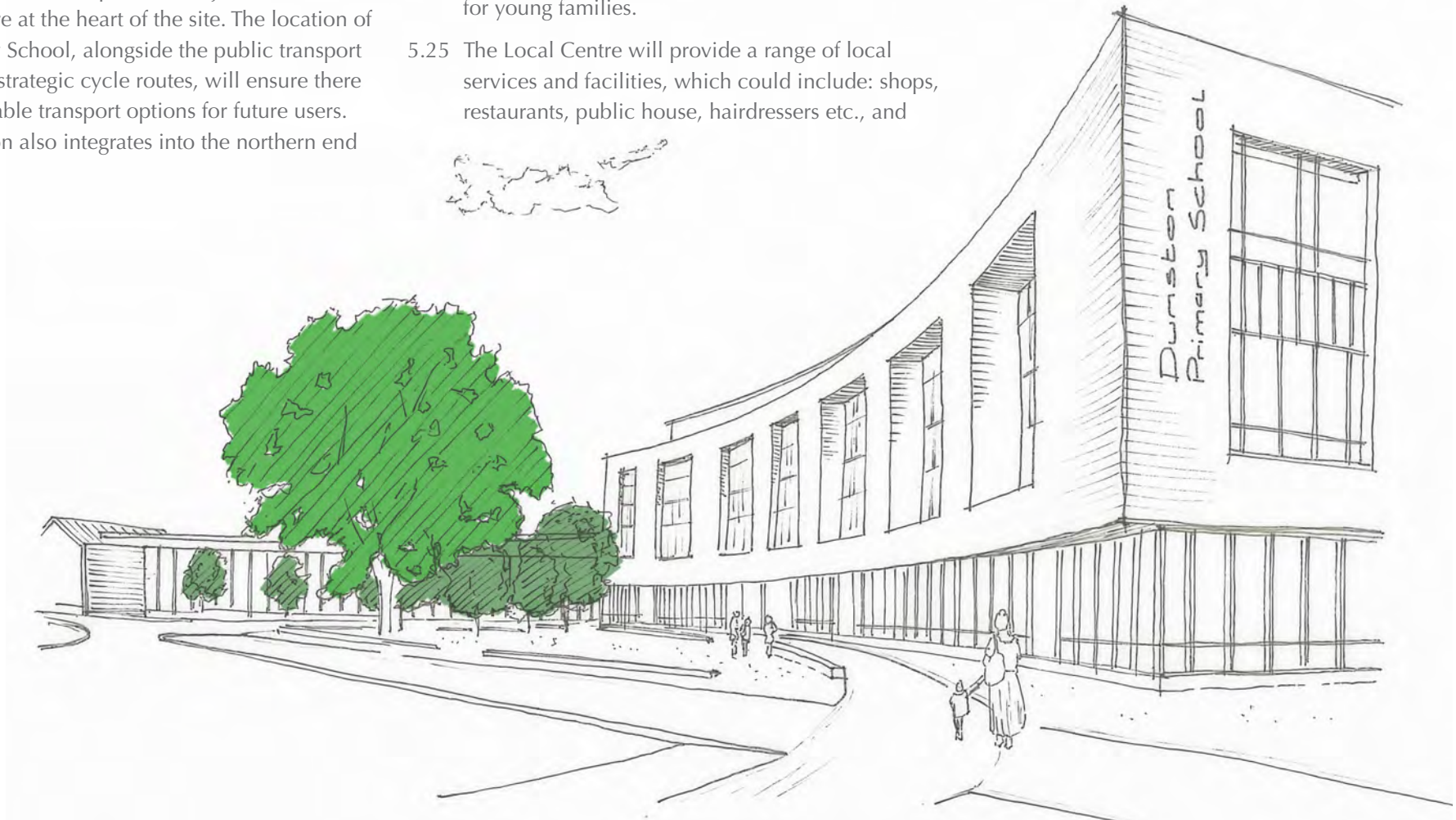
**Local Centre and Primary School:**

- 5.23 A Local Centre measuring 2 Ha is at the heart of the scheme, to serve both the new development and to provide additional community facilities for the area.
- 5.24 Land for a one form entry primary school (measuring 1.5 Ha) is provided adjacent to the Local Centre at the heart of the site. The location of the Primary School, alongside the public transport routes and strategic cycle routes, will ensure there are sustainable transport options for future users. This location also integrates into the northern end

of the green wedge that runs through the centre of the site. The school is located within 500m of a large proportion of the proposed residential housing, and directly adjacent to the higher density local centre residential area where it is envisaged there will be a higher proportion of homes suitable for young families.

- 5.25 The Local Centre will provide a range of local services and facilities, which could include: shops, restaurants, public house, hairdressers etc., and

potentially a GB surgery. A diverse mix of uses will contribute towards making this area an active and vibrant place throughout the day. It will also ensure that the Garden Village is self sufficient and reduce residents need to travel to access day to day facilities.





5.26 The Local Centre is positioned adjacent to the proposed primary school to maximise the use and accessibility of the Local Centre. It has also been positioned along a strategic cycle route, footpath corridor and public transport corridor giving the option for journeys to be made sustainable modes of transport (walking/cycling) as opposed to by car.

5.27 The Neighbourhood Centre will provide a range of facilities that could possibly include up to 2ha of A1 retail uses including a GP Surgery and other uses such as Restaurants and a Public House. A diverse mix of uses will contribute towards making this area an active and vibrant place throughout the day.

5.28 The Neighbourhood Centre is positioned adjacent to the Primary School and along a strategic cycle and footpath corridor and public transport corridor giving the option for journeys to be made by means other than the private car.





## PHASED DEVELOPMENT

5.29 The phased delivery of the site is based on the character areas of the development, and will ensure that a sense of place and individual character can be created at each juncture. The phasing for the site is proposed as follows:

- Phase 1 - Dunston South
- Phase 2 - Dunston South East
- Phase 3 - Village East
- Phase 4 - Village Centre
- Phase 5 - Village South
- Phase 6 - Village West.

5.30 Phase 1 would logically extend south from the existing built up area of Dunston, with residential parcels able to make use of existing service such as the school, and with minimal landscape or environmental impacts.

5.31 Phases 2 and 3 would deliver the residential and employment development around the existing road infrastructure (i.e. the A449), including the 'southern' neighbourhood centre, which would support the growing community.

5.32 Phase 4 would deliver the Village Centre, train station, school and surrounding residential development, as the wider development would be of a scale to support and sustain these services (in terms of footfall and patronage).

5.33 Phases 5 and 6 would extend towards the rural fringes of the site, to the south and west, delivering the remaining residential parcels and benefitting from the local centre, station and other supporting infrastructure delivered by the earlier phases.



5.34 Overall, the phasing of the scheme will ensure that housing is delivered alongside employment and other supporting services to ensure the continued viability and sustainability of the Village throughout its build programme.



# 6

## **SUSTAINABLE DEVELOPMENT PRINCIPLES**



6.1 The land at the Dunston Estate represents a highly sustainable solution to the Borough and wider regions' housing and employment needs which will generate economic, social and environmental benefits in accordance with the three pillars of sustainable development as well as Garden City Principles.

### LOCATION AND SUSTAINABILITY

6.2 As noted in the site context section, Dunston is currently a Tier 4 settlement with limited services, including a primary school (St Leonard's CE First School), a village hall and church. It is served by bus stops along the A449, with hourly services to Wolverhampton, Stafford and Cannock.

6.3 The nearest higher tier settlement is Penkrige, which is 3.5km to the south and includes a wide range of shops and services and a train station with direct connections to Birmingham and the national network via the West Coast Mainline. Stafford Town Centre is approximately 5km north and forms the main settlement of the adjoining district, with a high level of services and a main station on the West Coast Mainline.

6.4 However, as set out on the masterplan, the Garden Village proposals provide an opportunity to create a self-sufficient community with a new railway station and full suite of land uses and facilities to serve the needs of the existing and future communities, reducing the reliance and level of vehicle trips required to these nearby towns.



Services & Facilities Plan

## PROVISION OF A TRAIN STATION

- 6.5 To improve the sustainability of Dunston, there is the opportunity to deliver a new train station as part of the Garden Village proposals, between the existing stations at Stafford and Penkridge. A new station is one of the Council's key aspirations for any new settlement and the main reason for identifying the area of search along the West Coast Mainline, to ensure that such settlements maximises access to sustainable modes of transport.
- 6.6 MDS Transmodal have been appointed to investigate the feasibility of adding a station at Dunston to the existing network. Their analysis concludes that a new station with two platforms and a shelter could be located anywhere along the section of track within Rigby Estates landholding, as it a straight section of track with sufficient stopping distances in both directions in relation to the nearby stations at Stafford and Penkridge.
- 6.7 In terms of network capacity, a new station here would delay any trains passing on this line by approximately 3 minutes which would consequently have an impact on trains passing along this line and other trains between Stafford and Bushbury Junction (near Wolverhampton). This length of railway line, between Wolverhampton and Birmingham, is reasonably congested with existing services, however there is spare capacity.
- 6.8 If a new station was built at Dunston, the best strategy would be for trains to leave Liverpool 3 minutes earlier and arrive at the end destination 3 minutes later. At present, trains are stopped in Liverpool Lime Street for between 22 and 25 minutes respectively so it would be possible to create a stop on this route, although this does present some challenges and pinch points in the wider network.
- 6.9 In terms of patronage, Penkridge Station accommodated 257,000 passenger movements in 2017/18 and had a local parish population of 8,500 (which includes Dunston). This represents a relatively high level of utilization for a semi-rural area and reflects the relatively compact nature of Penkridge itself, centred around the station.
- 6.10 A twice hourly frequency for Dunston is attractive, particularly as the services are relatively rapid to the 3 main centres of population at Stafford (7 minutes), Wolverhampton (10 minutes) and Birmingham (34 minutes). By connection, Manchester can be reached in 70 minutes and London in 98 minutes. Liverpool can be reached directly in 70 minutes. A station at Dunston could enjoy a similar level of service.
- 6.11 If and when HS2 is completed, the 4 fast trains which pass through the site could possibly transfer onto the new and faster route, which would leave 2 semi-fast trains and probably an increased volume of freight trains along this route.
- 6.12 The revenue that could be achieved from the additional station may be sufficient to justify its construction and to fund the incremental additional rolling stock. This has been assumed on the basis of having approximately 11 people alighting per train.
- 6.13 If a station is not considered viable here, then there is a dedicated and frequent bus service which links Dunston with Stafford and Penkridge Stations, which could be fully utilised by existing and future residents. There is also the option to develop a park and ride facility at Dunston to relieve peak car congestion at Stafford. This facility could attract passengers who are travelling to Wolverhampton or Birmingham to drive to Dunston and to utilise the park and ride facility to avoid congestion around Stafford and its rail station.
- 6.14 As such, the site provides the opportunity to deliver a new railway station, and Rigby Estates will continue to explore the feasibility of this with Network Rail and other relevant stakeholders. If this is not considered to be practicable then the site has excellent bus links with nearby stations and an opportunity to provide a park and ride facility to ease congestion in Stafford.





## ACCESSIBILITY

- 6.15 The proposals have been designed to maximise self-containment, reduce the length of car trips and provide a new railway station to maximise journeys by rail, as explored by in the previous section.
- 6.16 Analysis of existing travel to work patterns indicates that almost half (47.6%) of residents in the local area either work from home or travel under 10 kilometres to work, which is a high level of self-containment when compared to the wider county area, indicating that this is a sustainable location for new residential development.
- 6.17 A comprehensive walking and cycling network is proposed internally within the site, which will utilise existing Public Right of Ways as much as possible both on and off-site to improve permeability within the site and with nearby settlements. The masterplan for the development has been designed with the movement of pedestrians and cyclists as a priority, ahead of vehicles, and includes a number of shared spaces and quiet streets to constrain vehicular speeds and therefore to provide a safe environment for pedestrians and cyclists.
- 6.18 The local centre and railway station have also been located centrally within the site to maximise local walking and cycling trips and enable the creation of walkable neighbourhoods; with isochrone plan (Figure 10) showing that all parts of the site are within 2km walking distance of these facilities.



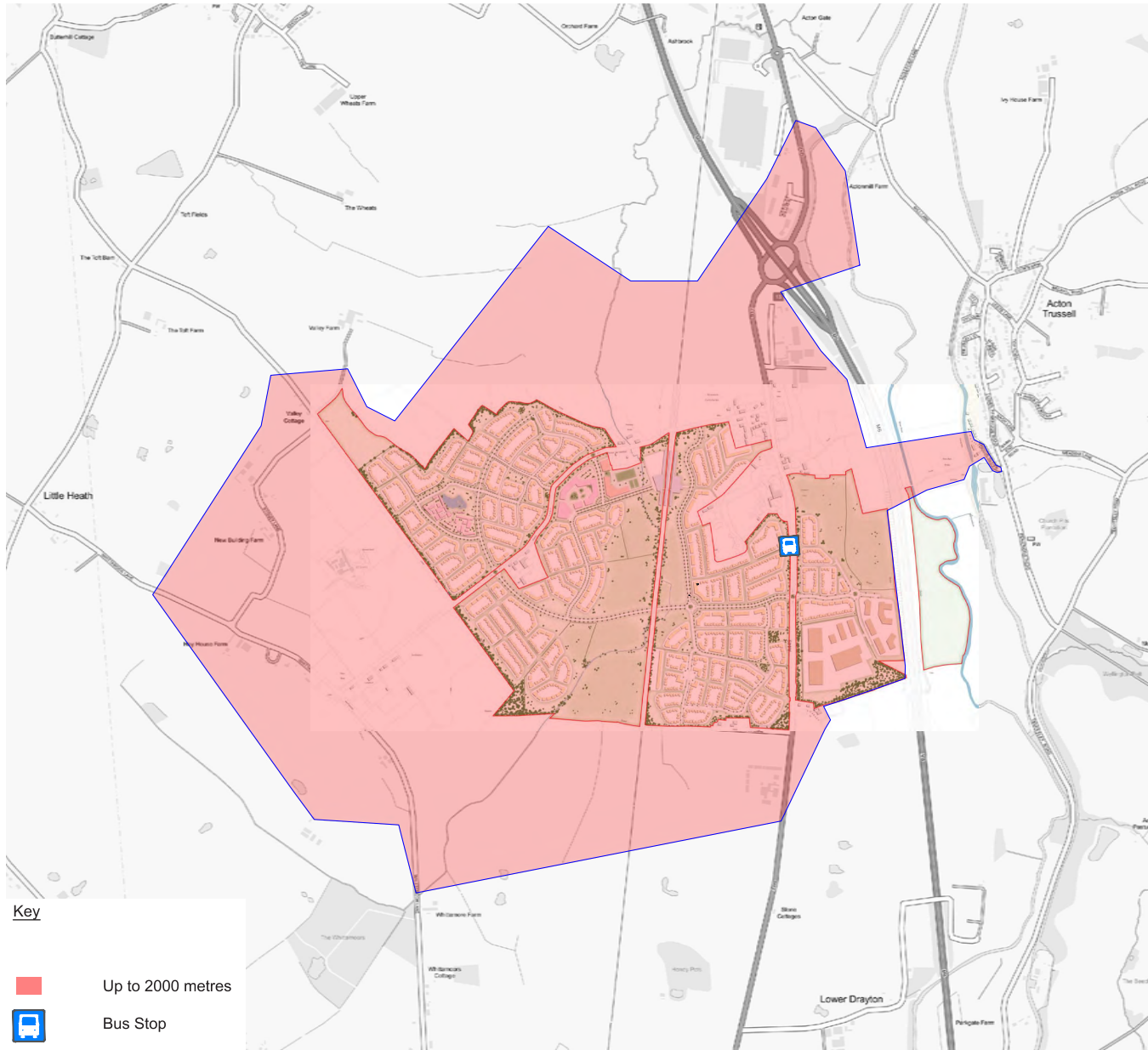
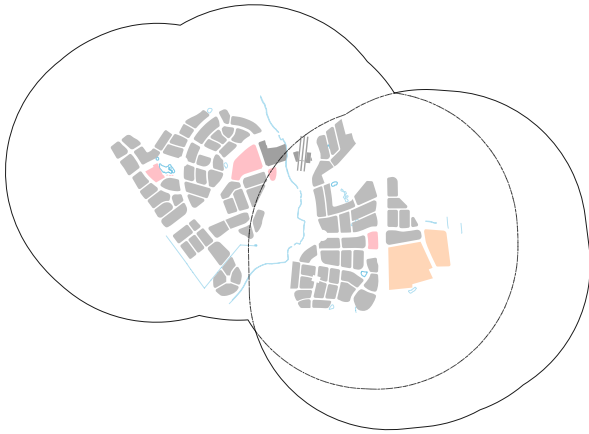


Figure 10: 2km Walking Isochrone

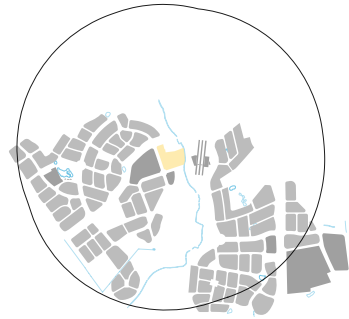
6.19 The table and image at Figure 10 show the distances to key services from each part of the proposed Garden Village.

#### DISTANCE TO SERVICES

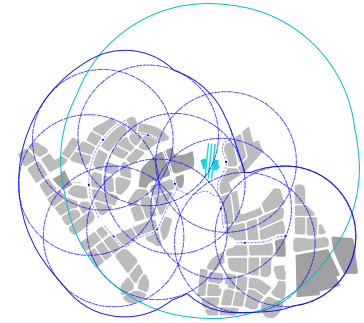
Local Facility	Target Walking Range	% of dwellings within range
Neighbourhood Centre / Local Centre / Employment	800m	100%
Primary School	800m	100%
20ha Natural Greenspace Site	2km	100%
Formal Open Space	600m	100%
Public transport nodes.	400m	100%
Children's Play Space	400m	94%
WCML Train Station	800m	92%



**Neighbourhood / Local Centre /  
Employment**  
800m Catchment



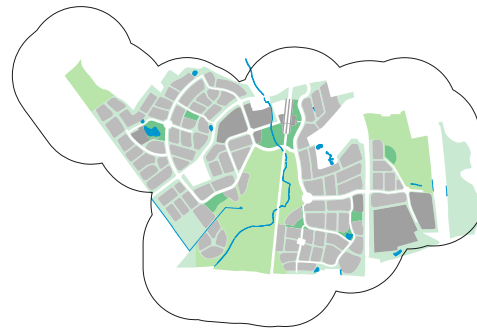
**Primary School**  
800m Catchment



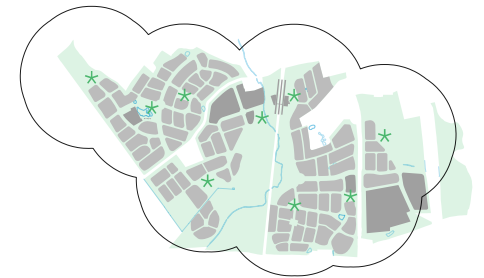
**Public Transport Nodes**  
400m Catchment Bus  
800m Catchment Train



**20ha Natural Greenspace**  
2km Catchment



**Formal Open Space**  
600m Catchment



**Children's Play Space**  
400m Catchment



6.20 In respect of buses, existing services from the Dunston Hall bus stop on the A449 provide access to Stafford, Penkrige and Cannock within 32 minutes, which is the average bus journey time in the West Midlands as shown on the isochrone plan at Figure 11.

6.21 Once the proposed new railway station is included this catchment increases massively with the following large towns all within the West Midlands average rail commute, which equates to 59 minutes c: Stafford, Wolverhampton, Birmingham, Tamworth, Telford, Stoke-on-Trent, Crewe and Northwich (as shown at Figure12).

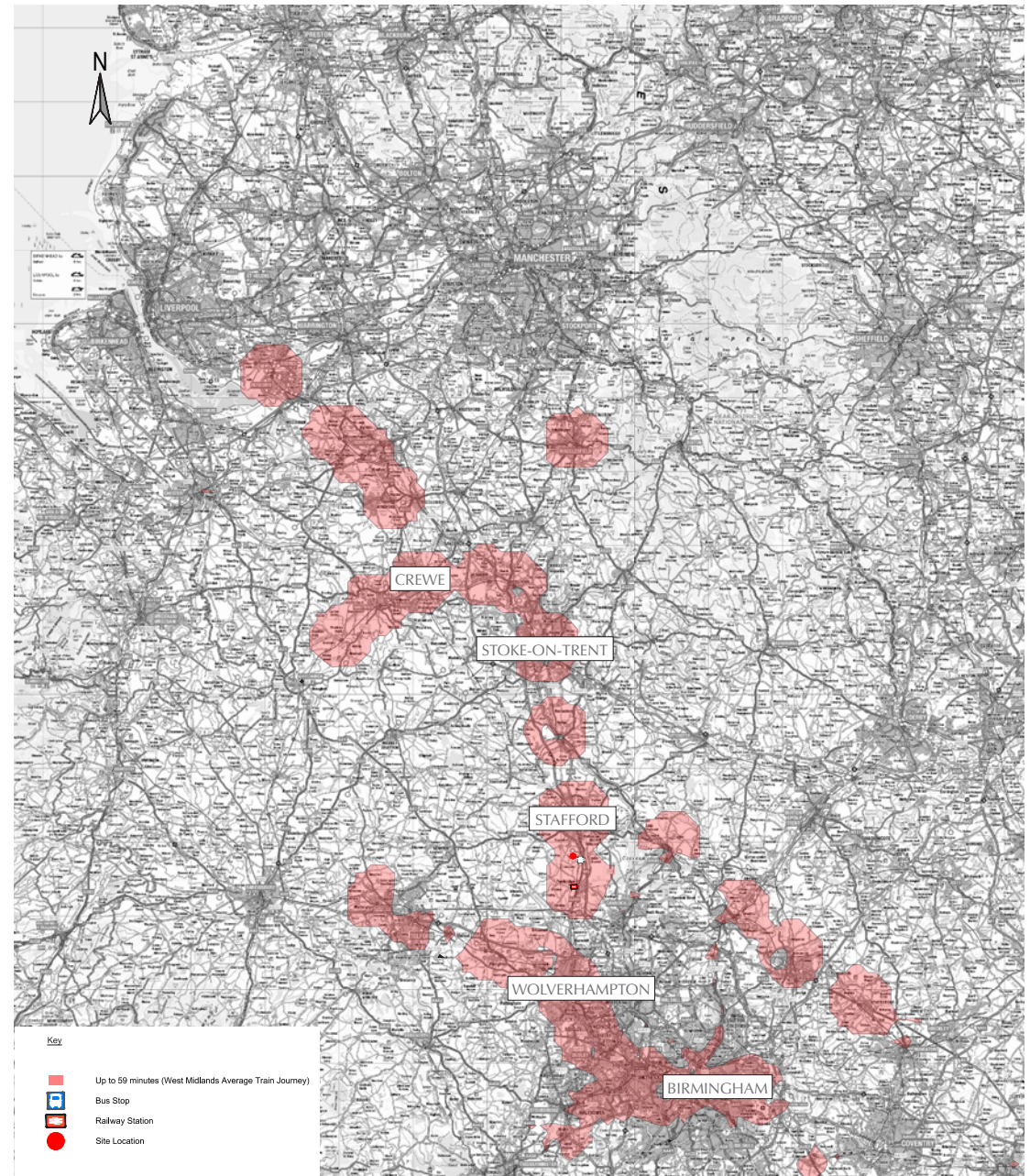
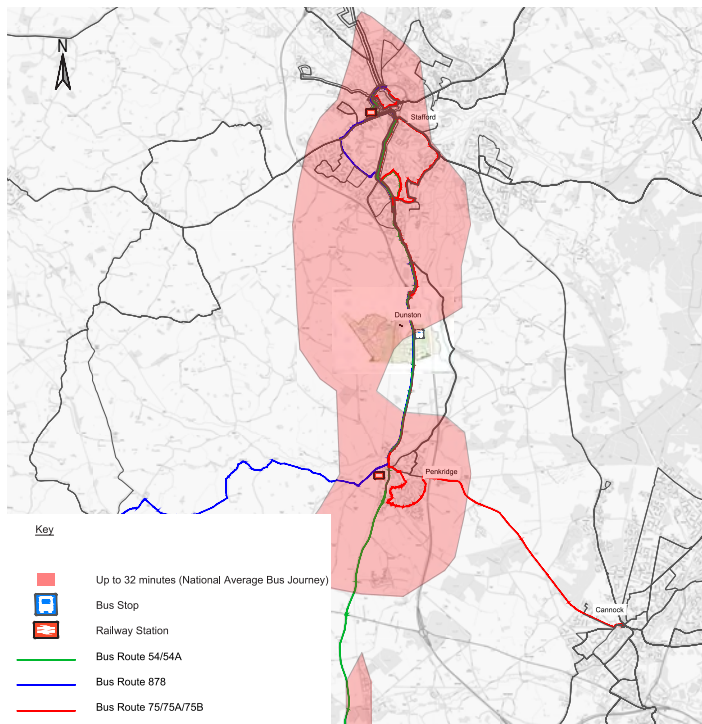


Figure 11: Bus Isochrone and Routes

Figure 12: Proposed Dunston Railway Station Isochrone All Day



- 6.22 The proposed Public Transport Strategy aims to provide an hourly bus service which ensures that 90% of residents are within 400m of a bus stop; either through connecting into, diverting or improving the frequency of existing bus services.
- 6.23 The main access routes will act as a sustainable transport corridor, and will be designed to accommodate cars, pedestrians and cyclists, as well as a bus-based rapid transit route; with potential enhancements including bus lanes and waiting facilities at bus stops. Options for this are being explored with Staffordshire County Council and Arriva Midlands, as well as the potential for additional off-site bus corridor improvements and park and ride facilities.

- 6.24 Such a facility could be a park and ride or park and bus with a possible public transport hub near the proposed railway station, which would be of benefit to new residents and existing members of the public.
- 6.25 This would be supported by an active and detailed Travel Plan Strategy and monitoring regime to influence journey habits by encouraging sustainable travel.
- 6.26 In respect of road access, the scheme provides the opportunity to improve the existing School Lane junction with the A449. At this stage, it is considered that this would be best served by a right turn lane ghost island junction. A second primary access would also be provided to serve new proposed new Garden Village at the A449

located further south, with the current masterplan showing this taking the route across the narrowest width of floodplain, to minimise the risks of flooding obstruction on this route, and the amount of mitigation/ engineering required to support it. At this stage, it is considered that the form of this junction would be a four arm roundabout. Options will be explored to provide a new spine road and railway bridge that crosses the West Coast Mainline leading from the new roundabout junction to improve the permeability of the site.

- 6.27 In transport terms, it is concluded that the Dunston Garden Village can be sustainably accommodated and provide genuine improvements to public transport and associated infrastructure.



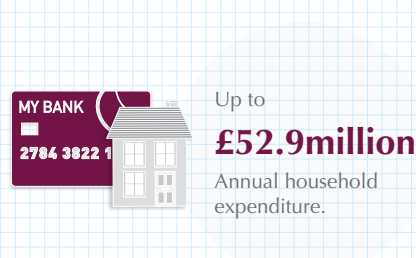
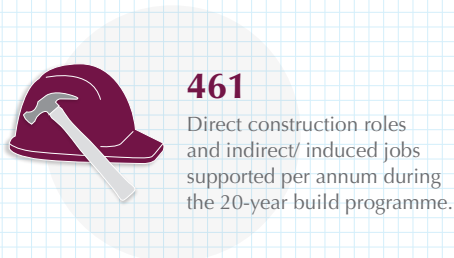
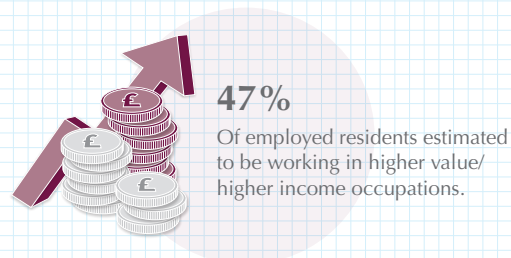
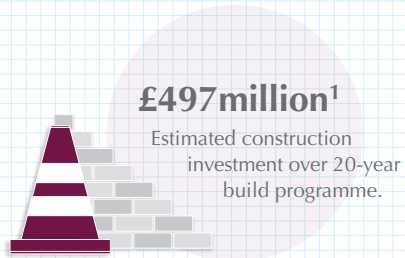
# ECONOMIC BENEFITS

DUNSTON GARDEN VILLAGE

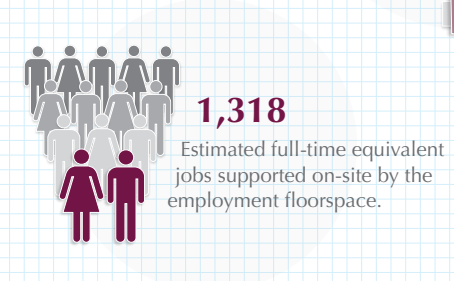
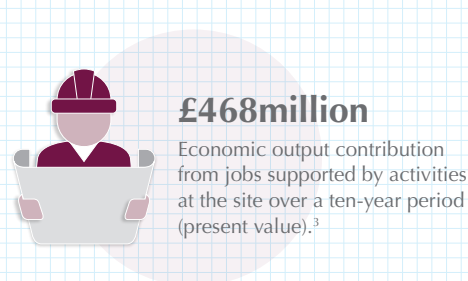
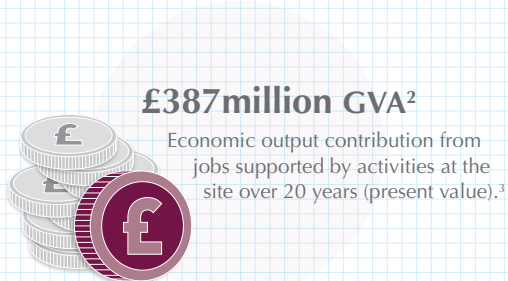
CONSTRUCTION OF UP TO 3,000 RESIDENTIAL DWELLINGS, 7.8HA OF EMPLOYMENT FLOORSPACE, A LOCAL CENTRE AND A NEW RAILWAY STATION

## CONSTRUCTION BENEFITS

## OPERATIONAL BENEFITS



**TAX**



<sup>1</sup> The construction cost has been estimated using the BCIS Online tool and is exclusive of external works, contingencies, supporting infrastructure, fees, VAT, finance charges etc.

<sup>2</sup> GVA, or gross value added, is the measure of the value of goods and services produced in an area, sector or industry.

<sup>3</sup> Figures over a ten-year time-frame are provided as net present value estimates.

## ECONOMIC INVESTMENT

- 6.28 The development of the Garden Village will contribute to building a strong, responsive and competitive economy.
- 6.29 The development of the Garden Village will secure a number of economic benefits in terms of job creation, tax revenues to the Council and increased expenditure in the local economy.
- 6.30 Whilst employment and commercial uses generate obvious economic benefits, housing delivery can also play a key role in the flexibility of the local labour market which is an important component in local economic competitiveness and maintaining a dynamic economy. This is because a shortage of housing or lack of affordability can act as a barrier to people accessing employment opportunities or result in long distance commuting and associated sustainability impacts.
- 6.31 The potential economic benefits of Dunston Garden Village are summarised below, although it should be noted that these figures are high level estimates, given that exact uses are yet to be confirmed:

## CONSTRUCTION IMPACTS<sup>1</sup>

- The proposed development could support around 461 roles on-site and in the wider economy over the 20-year build programme.
- The proposed development could generate an additional £387 million of gross value added (GVA) to the regional economy during the 20-year construction period (present value)<sup>2</sup>.

## OPERATIONAL IMPACTS

### Housing

- Up to 3,740 economically active and employed residents are estimated to live in the new dwellings once the site is fully built and occupied. If residents show a similar employment profile to the existing working age population of South Staffordshire, around 47% could be working in higher value occupations.
- Once fully built and occupied, the households are estimated to generate expenditure in the region of £52.9 million per annum.
- Once fully built and occupied, the proposed new dwellings will generate approximately £15 million in first occupation expenditure within 18 months.
- The construction of the new homes could generate around £5 million per annum in additional Council Tax revenue.
- The proposed development has the potential to generate around £16 million in New Homes Bonus revenue for South Staffordshire Council and £4 million for Staffordshire County Council.

<sup>1</sup> In order to calculate the building floor area of the employment floorspace and local centre, a plot ratio of 0.42 has been applied (taken from the UK Government's Employment Land Review Guidance Notes).

<sup>2</sup> Where future benefits are calculated over a ten-year period, they have been discounted to produce a present value. This is the discounted value of a stream of either future costs or benefits. A standard discount rate is used to convert all costs and benefits to present values. Using the Treasury's Green Book, the recommended discount rate is 3.5%.



### COMMERCIAL/ EMPLOYMENT<sup>3</sup>

- Overall, the proposed development will support an estimated 1,318 gross full-time equivalent (FTE) jobs on-site once the employment floorspace, local centre, primary school and train station are built. Accounting for leakage, displacement and economic multipliers, this equates to 1,123 net additional FTEs for the South Staffordshire economy.
- The overall GVA contribution is estimated to be around £54.4 million per annum once the employment floorspace is built, along with the primary school and the train station. Over a ten-year period, the GVA contribution is estimated at £468 million (present value).

### COMMUNITY BENEFITS

6.32 The development of the site to provide a Garden Village will perform a social role by generating the following community benefits:

- Provide approximately 3,000 new dwellings to support the planned future growth of South Staffordshire and the wider Birmingham Area;
- Provide a range of open market housing comprising various types to meet the needs of the local community;
- Provide 7.8 hectares of employment space and 4 hectares of mixed use commercial land to meet employment needs within the borough;
- Provision of a 1.5 Ha site for a new primary school; and 1.5 Ha site for a new railway station;
- Provision over 35 Ha of public open space and outdoor sports provision for future residents and the wider community. The proposals for the site can deliver integrated open space that complements and strengthens links the open countryside beyond the Garden Village; and
- The provision of additional retail and leisure facilities which can be used by both existing and future residents and will reduce the need to travel to Penkridge and Stafford.



<sup>3</sup> At this stage, the calculations for the local centre have been made using employment density calculations and additionality guidance for retail floorspace. Details on the exact use types in the proposed local centre use types will be available at a later date.

## ENVIRONMENTAL CONSIDERATIONS

6.33 The key environmental constraints are set out below, with reference to the findings of the technical reports that have been undertaken to date.

## LANDSCAPE AND VISUAL IMPACT

- 6.34 As confirmed within landscape and visual analysis, the site is not subject to any formal landscape designations and also lies outside the Green Belt. The site lies within a character type known as 'Ancient Clay Farmlands', where the critical threat to landscape quality is the loss of hedgerows and hedgerow trees; however the vast majority of existing hedges and trees will be retained.
- 6.35 In respect of landscape sensitivity our analysis broadly supports the Council's Assessment and confirms that the vast majority of the proposed development will be within areas of low-moderate sensitivity.
- 6.36 In respect of visual impacts, given the large size of the site, visibility of the site within the local area is generally limited in most directions due to a combination of features including existing built form, vegetation and topography; whilst high sensitivity from specific viewpoints and receptors has been identified through our visual analysis and accounted for with mitigation in the illustrative masterplan.



## FLOODING AND DRAINAGE (WEETWOOD)

- 6.37 Weetwood have been instructed to undertake a preliminary appraisal of flood risk and drainage conditions with the Dunston site. According to the Environment Agency's Flood Risk Map, the site is located within Flood Zones 1, 2 and 3 (so ranging from low to high risk of river flooding), with a large swathe of the centre of the site around the railway line, and far eastern section around the M6, of the highest risk. The source of flooding is from the River Penk and Pothooks Brook.
- 6.38 The Environment Agency has not undertaken any detailed modelling of Pothooks Brook and the Flood Map for Planning is based on national generalised modelling. To accurately assess the risk of flooding from Pothooks Brook, detailed hydraulic modelling would need to be undertaken as part of a planning application.
- 6.39 The site is at risk of flooding from surface water within low lying areas of the site, and from groundwater within the eastern portion of the site.
- 6.40 Despite the above, it is considered that the site could be developed for a range of uses subject to the implementation of mitigation measures appropriate to the risk of flooding in that area and the vulnerability of the proposed use to flood risk.
- 6.41 The construction of new roads, as proposed, across the site, around Pothooks Brook and the associated flood plain is feasible subject to the principal flood pathways being maintained and the flood risk is not increased. This would require the development of new culverts and/or bridges to be designed with capacity to convey the 1 in 100 plus climate change AEP event so as not to increase the flood risk in the area.
- 6.42 There is the potential to realign Pothooks Brook to reduce the risk of flooding associated with the blockage of culverts. This would result in the removal of land to the east of the West Coast Mainline from Flood Zone 3.
- 6.43 That said, it is pertinent that the current masterplan does not show any development within Flood Zone 3, demonstrating that the proposed development is deliverable without any active management of the flood plain; but this option can certainly be explored should the Council desire a change to the layout or increase to the developable area.
- 6.44 This is also the case with the railway station, which is shown entirely within Flood Zone 1; however, it is possible that it could be located further south within Flood Zone 3 if required (by Network Rail or for engineering purposes), subject to the implementation of appropriate flood risk mitigation measures.



- 6.45 With regards to surface water, run off created as a result of the proposed development could be disposed of to Pothooks Brook and the River Penk. Surface water generated on new impermeable surfaces would be restricted to greenfield rates, with significant betterment provided during extreme storm events. This could be achieved through the provision of attenuation storage and outlet control devices.
- 6.46 The site lends itself to the creation of a cascade of attenuation features such as detention basins, retention ponds, wetlands and swales along the central spine of the site. This approach could form an integral part of a blue-green corridor through the site, providing new habitats and enhanced biodiversity in conjunction with open space, and some indicative SUDs features are shown on the masterplan.
- 6.47 In conclusion, the site can be developed for a range of uses subject to the implementation of mitigation measures appropriate to the risk of flooding and the vulnerability of the proposed use to flood risk. Surface water runoff can be managed using sustainable drainage systems.
- 6.48 Finally, it is noteworthy that the current masterplan shows how the site and railway station can be developed without encroaching into Flood Zone 3; however there is potential to extend into these areas if required by the Council or other stakeholder, through more active mitigation measures such as the realignment of Pothooks Brook.

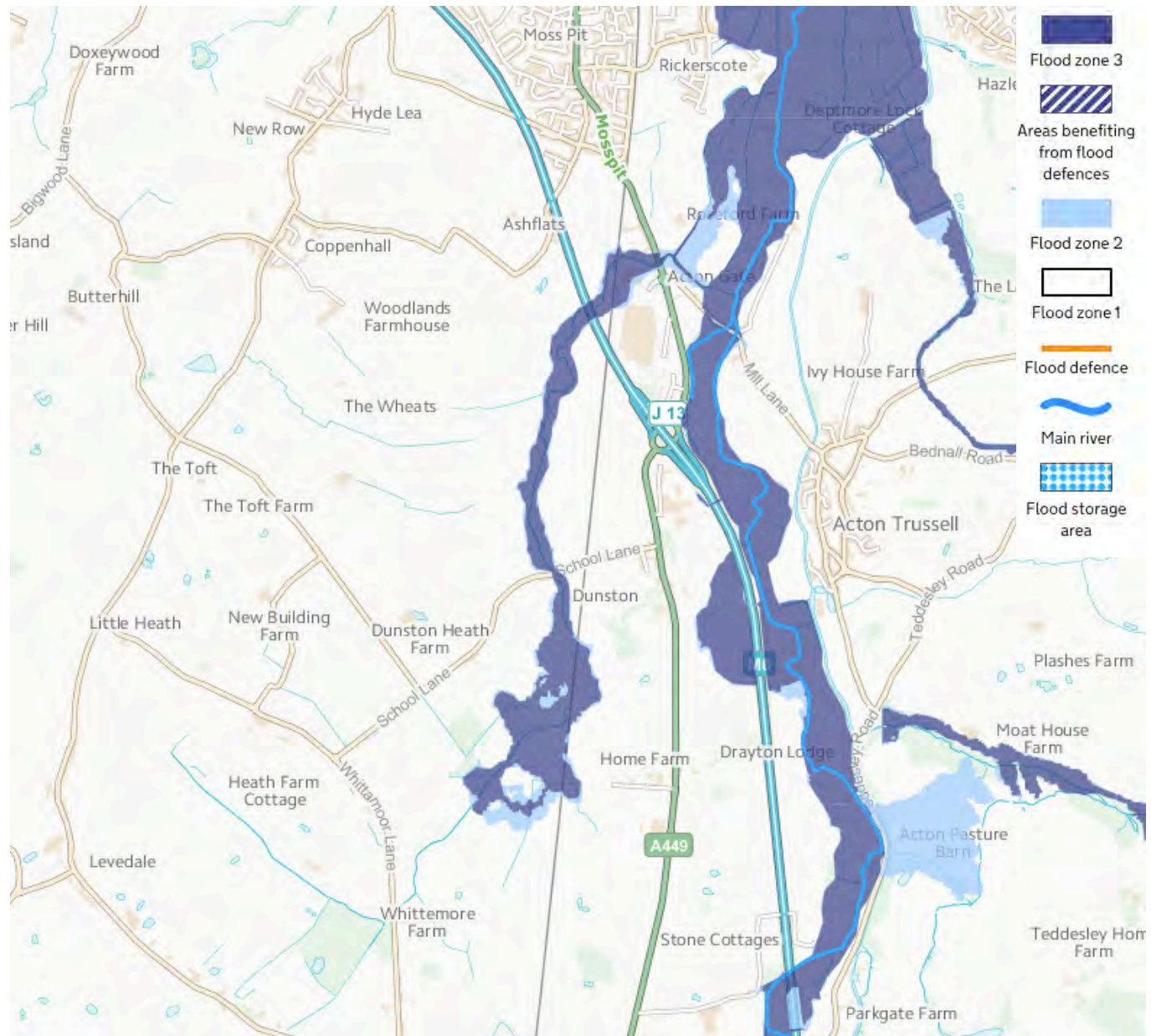


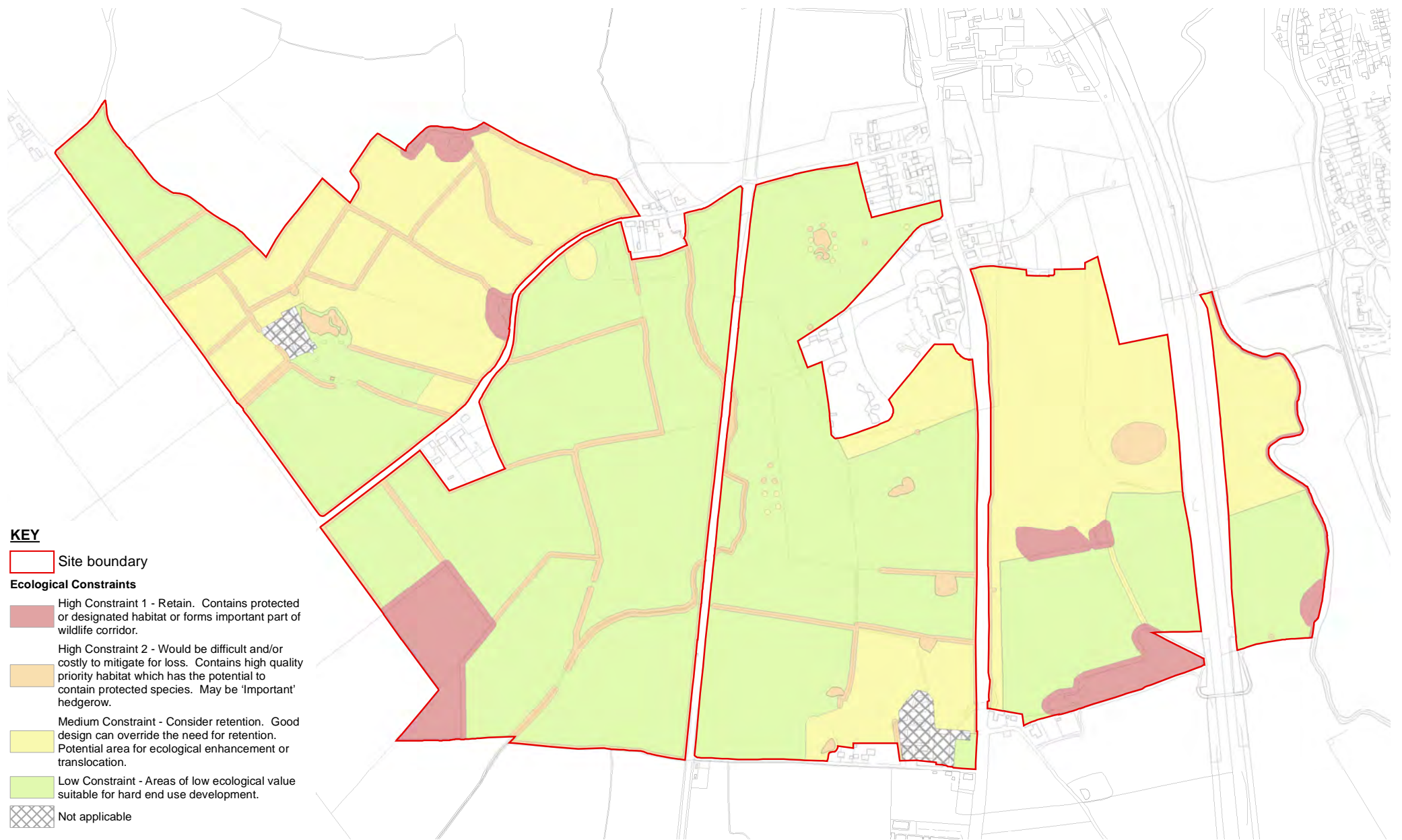
Figure 13: Flood Map - Environment Agency

## ECOLOGY

- 6.49 TEP was commissioned to provide advice on the ecological constraints and opportunities presented by the Dunston site. There are no nationally or internationally designated wildlife sites within 1 km of the site, although the site is located within a Natural England Impact Risk Zone (IRZ) for Cannock Chase SSSI, which provide Council's with a framework setting out certain types of development which have the potential to negatively impact on the SSSI. The proposed development is likely to trigger the SSSI IRZ criteria requiring further assessment work to be carried out as the development proposals progress.
- 6.50 One locally designated site lies within the Dunston site boundaries, the Cockpit Plantation retained Biodiversity Alert Site (BAS), whilst there are four locally designated sites within 2km of the proposed site boundaries:
- The Moathouse, Acton Trussel and Staffordshire and Worcestershire Canal;
  - The Whittmoors (retained BAS);
  - Little Heath (retained BAS); and
  - Teddesley Park Local Wildlife Site.
- 6.51 With the exception of the Cockpit Plantation, the development of this site is unlikely to directly impact on the locally designated sites listed above due to distance between the two features or in the case of the canal, the physical separation by the M6 and the River Penk.
- 6.52 Figure 14 shows the current habitats on site and shows areas of low, medium and high constraints with associated recommendations. Habitats in a high constraints 1 zone are recommended for retention as they contain protected or designated habitats or form an important part of the wildlife corridor.
- 6.53 High constraints 2 zones are areas which are difficult and/or costly to mitigate the loss for and are also recommend for retention. They contain high quality priority habitats which have the potential to contain protected species, including important hedgerows.
- 6.54 Medium constraint zones are where good design and mitigation can override the need for retention through ecological enhancement or translocation.
- 6.55 Low constraint zones are areas with poor ecological value that can be readily recreated and where development should be focused to reduce the impact of development works across the site.
- 6.56 The ecological appraisal highlights opportunities to enhance biodiversity across the site through additional planting and woodland management of key wildlife areas and corridors. It also supports the creation of a large recreational area on site, along with pond and swales, other SUDs features woodland planting, scrub and grasslands to enhance wildlife areas.
- 6.57 These areas will also provide additional habitats and corridors for wildlife, through features such as native hedgerows and wildflower meadows.
- 6.58 The ecological constraints have been fully considered and reflected in the illustrative masterplan, with no development within the high constraint areas and wildlife corridors shown throughout the site, with large amounts of planting and opportunities for SUDs, and large swathes of recreational land to reduce pressure on the Cannock Chase SSSI.
- 6.59 Overall this demonstrates that there are no ecological constraints that would prevent development of the site.







**KEY**

- Site boundary
- Ecological Constraints**
- High Constraint 1 - Retain. Contains protected or designated habitat or forms important part of wildlife corridor.
- High Constraint 2 - Would be difficult and/or costly to mitigate for loss. Contains high quality priority habitat which has the potential to contain protected species. May be 'Important' hedgerow.
- Medium Constraint - Consider retention. Good design can override the need for retention. Potential area for ecological enhancement or translocation.
- Low Constraint - Areas of low ecological value suitable for hard end use development.
- Not applicable

Figure 14: Ecological Constraints Plan



## ARCHAEOLOGY AND HERITAGE

- 6.60 There are no Conservation Areas within or adjacent to the site which will impact upon the proposed development of the Garden Village. There are however a number of listed buildings in close proximity site along with 2 Scheduled Ancient Monuments. These buildings relates to the historic Dunston Hall Estate, including; Dunston House, St Leonards Church and the Dunston Hall Stables (all Grade II listed), which have been considered as part of the design of this scheme. The location of the proposed residential/employment/commercial development has been carefully planned and designed to ensure that it does not impact on the setting of these historic assets. To prevent any impact arising, landscape buffers have been implemented where any views of the proposed development may be seen from the historical assets. This carefully placed landscaping will protect any significant views from and to the historical assets.
- 6.61 Equally the scheduled ancient monument (the moated site at Moat House Farm) is located in close proximity to the eastern site boundary; however no development is proposed east of the M6 and therefore development will not materially impact its setting; whilst the Hay House moated site to the west of the site, will be screened by a dense landscape buffer.
- 6.62 A full archaeological assessment will be undertaken at the planning application stage to identify any mitigation measures required; however at this stage, there are no archaeological constraints that would prevent the development of this site.

## NOISE

- 6.63 The main sources of existing noise come from; the West Coast Mainline, the A449 and the M6 motorway which run north to south through the site. Initial assessments suggest that the noise impacts of these sources can be mitigated through strong development buffers, as reflected in the Illustrative Masterplan.
- 6.64 As shown in the Masterplan, there is very limited development to the west of the West Coast Mainline and where there is development on the eastern side, dense vegetation and buffers are proposed.
- 6.65 As such, there are no noise constraints that would prevent the development of the site.



## GROUND CONDITIONS

- 6.66 A desktop assessment suggests that the site has not been subject to intensive development, reflective of its use as agricultural pasture land; albeit there is some potential contamination due to the existing railway line, motorway and main road. A full investigation will be prepared as part of the application stage, although this will not prevent development of the wider site.
- 6.67 Historic mining activity is a major constraint in the wider West Midlands area, however this land does not appear to have been mined or worked.



### AGRICULTURAL LAND CLASSIFICATION

- 6.68 The high level agricultural land mapping (taken from the South Staffordshire evidence base 2009) shows that the site is a mix of Grade 2 (very good), Grade 3 (good to moderate) and Grade 4 (poor) agricultural land. The majority of the land within the land ownership is Grade 3 and therefore will require a detailed assessment to how much is Grade 3a and therefore considered best and most versatile.
- 6.69 However given the preponderance of Grade 2 and 3 land within the wider area, this should not form a constraint to prevent development of the site.



### UTILITIES

- 6.70 An assessment of local utilities has yet to be completed; however the proposals are of sufficient scale to provide significant upgrades or contributions to local services if there is insufficient capacity within the existing network, and therefore again this does not form a constraint to development at this stage.



### SUSTAINABILITY CONCLUSIONS

- 6.71 There is a compelling need to deliver the development needs of South Staffordshire and the wider Birmingham region in an appropriate way. The proposed large scale development would deliver a range of sustainability benefits with limited impacts. The development of this site is a wholly appropriate and sustainable outcome, which in itself will deliver a wide range of local and regional benefits.



7

# DEVELOPABILITY



## DEVELOPABILITY

- 7.1 The site will make a valuable contribution to South Staffordshire's needs with the delivery of up to 3,000 dwellings, approximately 8 hectares of employment land and circa 4 hectares of mixed use commercial space.
- 7.2 As part of the emerging Local Plan, South Staffordshire Council are considering Dunston as a location for the development of a new settlement which will deliver housing and employment growth beyond the plan period (i.e. after 2037), on the basis that there are sufficient other sites to meet their needs before then.
- 7.3 Although Rigby Estates LLP fully support this aspiration to deliver a new settlement, and the ambition and forethought to plan for the longer term; it is clear that Dunston Garden Village is a developable site that can begin contributing within years 6-15 of the current plan period, for the reasons set out below.

## DEVELOPABILITY CRITERIA

- 7.4 The NPPF clearly specifies at paragraph 78 that local authorities must identify specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan; with the supporting glossary at Annex 2 defining developability as:  
  
*“To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”*
- 7.5 This site represents a specific site in a broad location for growth, with the following suitability, availability and viability credentials:



## SUITABLE

- 7.6 The site is suitable for a new settlement in line with paragraph 72 of the NPPF as it:
- Is located outside of the Green Belt and could therefore be developed without delay;
  - Is well located in terms of transport infrastructure (M6, A449 and the West Coast Mainline) which can be fully utilised and taken advantage of to provide sustainable modes of transport including a new train station;
  - Proposes residential, employment, commercial, community and recreation uses all within walking distance of each other and interlinked;
  - Benefits from discreet topography and landscape features which will allow the proposals to integrate with the existing landscape in a sensitive way, maintaining key views and providing generous areas of open space;
  - Will address affordability issues within Dunston, which is one of the most unaffordable settlements in the district; and
  - It has been identified as a suitable location for such a settlement by a strategic policy making authority for delivery over the longer term, ensuring that expectations on delivery are realistic (NPPF paragraph 72).

## AVAILABLE

- 7.7 Rigby Estates LLP has legal control of the site and can develop the site at the earliest opportunity. The site is in a single land ownership meaning there are no ransom strips or legal covenants preventing the site coming forward. Furthermore, given there is only one ownership, the site can be carefully master planned to ensure that the development is located in the most appropriate places and not based upon where developers would like to see development within their ownership.
- 7.8 The site can deliver approximately 3,000 new dwellings, employment floorspace and commercial land and this can be developed when required by the South Staffordshire borough and the wider Birmingham region.

## VIABLE

- 7.9 The delivery of approximately 3,000 dwellings would make a significant contribution towards meeting the housing needs of the borough. The site will also deliver 8 hectares of employment land which will boost the economy of the borough and the wider Birmingham region and provide additional employment opportunities for existing and future residents.
- 7.10 An assessment of the site constraints has been undertaken illustrates that delivery of the entire site is achievable and deliverable, and a professional team of technical experts has been appointed to underpin this assessment and support the delivery of the site moving forward. Where any potential constraints are identified, Rigby Estates LLP has considered the necessary mitigation measures and will use investment in order to overcome any deliverability barriers. Thus far this has included locating all development outside of Flood Zone 3, apart from an essential secondary access, and this crosses the floodplain at the narrowest point, to minimise potential costs.
- 7.11 Rigby Estates LLP can, therefore, confirm that the development of the site is economically viable in accordance with the NPPF and NPPG. As a consequence, the company is committed to investing in the site and is confident that the residential development can be achieved within 6 years and beyond, or as and when required by the Council.









8

# CONCLUSIONS

- 8.1 Dunston Garden Village presents an exceptional opportunity to meet the future housing and employment needs of South Staffordshire and the wider Birmingham region in a location which has good access to the sustainable modes of transport and the national road network. This Vision Document sets out the case for allocating the site for a new settlement which could contribute within the emerging plan period and beyond.
- 8.2 The allocation of this land to develop a future Garden Village for residential-led development will deliver open market and affordable housing of type, quantity and quality that will make a significant contribution to the future growth needs of South Staffordshire. It will also deliver additional employment, commercial and community to boost the economy and support the growth of the settlement, the borough and the wider region.





## KEY BENEFITS

8.3 Accordingly, this Vision Document has demonstrated that the Dunston Garden Village:

- Is entirely available, suitable and viable for housing, employment and commercial development;
- Will deliver a mix of housing types, including both market and affordable homes;
- Will deliver additional employment land to support the economic growth of both the borough and the wider Birmingham region;
- Is located outside the Green Belt, which covers 80% of South Staffordshire and all the other areas proposed for a new settlement;
- Is located in a suitable location which can take advantage of existing infrastructure (railway line, national road network) and provide enhanced sustainable modes of transport. As shown in the masterplan, there is the opportunity to provide a train station within the Garden Village making the new settlement extremely accessible;

- Will provide additional community services and facilities to support and complement the limited level facilities within the existing village (including the school);
- Is not subject to any technical or environmental constraints that would prevent the delivery of the Garden Village, as demonstrated through the technical reports which have been prepared in support of the allocation of this Garden Village;
- Can deliver a landscape led masterplan that responds to the surrounding countryside, creating a high quality designed development which residents would want to live and work in;
- Will provide a network of high quality open spaces; and
- Generates significant socio-economic benefits by providing housing choice, and stimulating job creation and economic investment.







## SUMMARY

8.4 The development of Dunston Garden Village provides a highly sustainable opportunity to support the national, regional and local growth agenda which could assist in delivering the quantity, type and quality of homes and employment land that is required across the Borough and the wider region both within the emerging plan period and beyond.

8.5 The proposed development fully aligns with the latest government guidance on Garden Communities in that it:

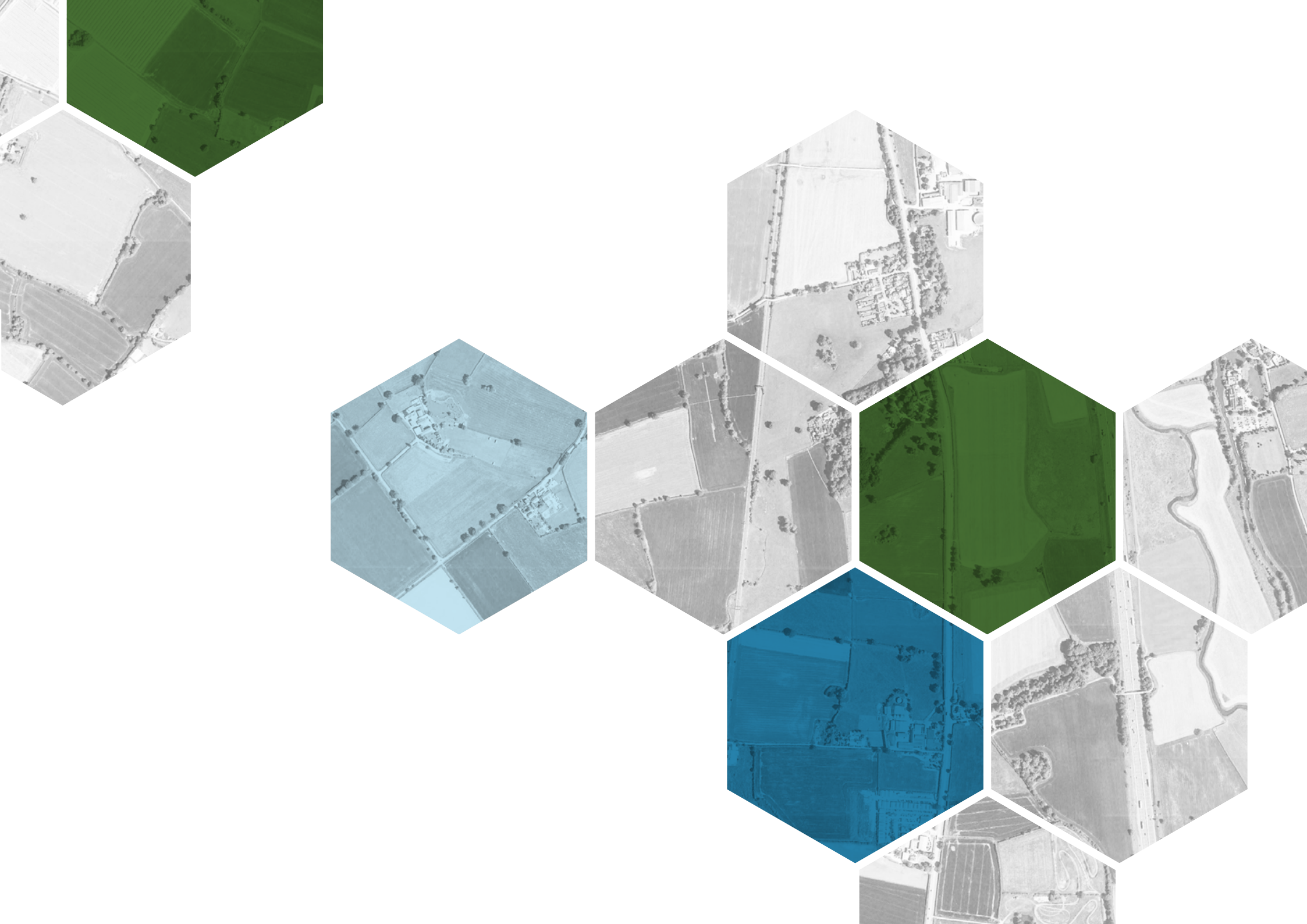
8.6 In addition to housing it will also provide:

- a purpose-built new settlement;
- a community with a clear identity and attractive environment;
- a mix of homes, including affordable, and the potential for self-build; and
- the opportunity to planned by the local authority and Rigby Estates in consultation with the local community.

8.7 In addition to housing it will also provide:

- job opportunities within a large employment area and local centre;
- attractive green space and public realm areas throughout the site;
- transport infrastructure, including roads, buses and cycle routes, and the potential train station;
- community infrastructure, a school, with potential for other community and healthcare uses; and
- a plan for long-term stewardship of community assets, to be developed in consultation with the Council.

8.8 Rigby Estates LLP is committed to working collaboratively with the Council and Key Stakeholders to ensure that the Borough's housing and employment needs are met in a sensitive and sustainable manner, both within the existing Local Plan Review and any future review or additional DPD process required to deliver a new settlement.







## **Appendix 3 – Landscape and Visual Appraisal – Pegasus Environment**



A wide-angle photograph of a rural landscape. In the foreground, there is a field of tall, green grass with some brown leaves scattered on it. In the middle ground, there are several buildings, including a long, low structure with a corrugated metal roof and a larger, more complex building with multiple chimneys. Behind the buildings, there are several tall, dark evergreen trees. The sky is a clear, bright blue. The overall scene is peaceful and rural.

**DUNSTON GARDEN VILLAGE, STAFFORDSHIRE**  
**INITIAL LANDSCAPE AND VISUAL APPRAISAL**

NOVEMBER 2019



## 01 INTRODUCTION

- 1.1 This Initial Landscape Vision Document and Visual Appraisal has been prepared by Pegasus Group on behalf of Rigby Estates LLP. The report feeds in to and accompanies a document to support the allocation of land around Dunston, Staffordshire as a Garden Village in the second stage of the Local Plan process.
- 1.2 The location of the site is illustrated in Figure 1. There are five parcels of land that comprise the site shown on the plan opposite. Each parcel has been assigned a letter reference for the purpose of referencing areas of the site clearly throughout the report.
- 1.3 The appraisal considers the possible effects of the proposed development upon landscape features, landscape character and visual amenity. Given the scale and extent of development along with the context of the surroundings, a 2km study area is considered to be appropriate.
- 1.4 The findings discovered through both desk-top study and on site assessment work have been used to inform mitigation recommendations and further iterations of the Illustrative Masterplan.



Figure 1: Site Location



## 02 SITE CONTEXT

- 2.1 The site is located adjacent to the small village of Dunston, east of the village of Acton Trussell and north of the market town of Penkridge. The site runs westwards from the River Penk, straddling the M6 (just south of Junction 13), A449, and School Lane. Each of the five land parcels total approximately 164 ha.
- 2.2 Figure 2 opposite highlights the site boundary in the context of local villages and roads. The following pages display a range of annotated photographs showing views from within the main site area. The viewpoint locations are shown on Figure 3.



Figure 2: Site Context Plan





A - View looking south east from north west corner of site



B - View looking north west near Dunston Heath Farm



C - View looking north east from beginning of footpath leading from Long Lane





D - north east from Dunston Heath Farm



E - View looking north east from School Lane on western boundary



F - View looking south from Footpath Dunston 9





G - View looking north west from School Lane



H - View west from railway footbridge in northern area of the site



I - View east from railway footbridge in northern area of the site





J - View looking north from Swan Lane

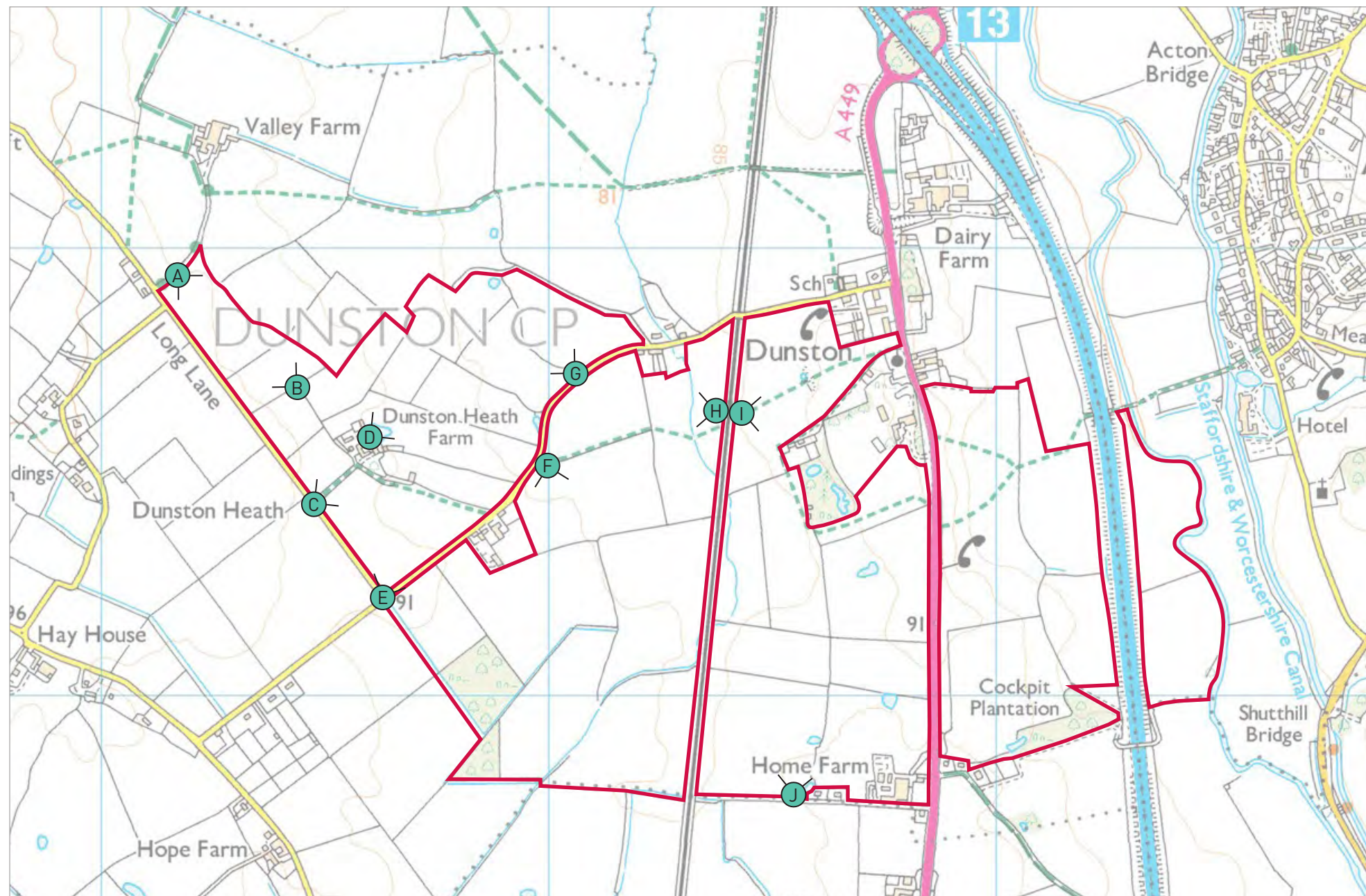


Figure 3: Internal site viewpoint location plan



### 03 DESCRIPTION OF THE PROPOSALS

- 3.1 The proposed development, see Figure 3 opposite, suggests development of four of the five land areas. This includes a range of residential, employment, mixed commercial and education provision along with generous amounts of public open space.
- 3.2 Residential development is mainly focused in the site parcels either side of School Lane and the railway line with a small amount sited east of the A449. Employment uses are suggested adjacent to the M6 road corridor. Retail and Commercial uses are proposed in two main locations, one west of the railway line, around the current Dunston Heath Farm, another adjacent to School Lane with a proposed school along with a smaller area fronting the A449. A large area of POS is located along the railway line, following the extents of the flood zone, similar north of the proposed employment.
- 3.3 Buffer tree planting is proposed along the north and north western boundaries as well as along the south western boundary, parallel to Long Lane and the southern boundary. Larger areas of woodland are proposed in the north western corner and along the boundary with the M6.
- 3.4 Key streets throughout the development are lined with avenue trees whilst existing field boundary vegetation has been retained where possible and used to guide development locations. The area of woodland to the south western corner of the site has been retained.
- 3.5 The mitigation proposals have been discussed further in Section 7.



Figure 4: Illustrative Masterplan

Key	
	Residential Development 64.3ha - Up to 3000 dwellings
	Employment Area 7.8ha
	Local / Neighbourhood Centres 4.0ha
	Primary School 1.5ha
	Potential WCML Train Station 1.5ha
	Public Open Space
	Parks and Gardens
	Primary Routes



## 04 DESIGNATIONS AND POLICY CONTEXT

### Designations

- 4.1 There are no designations covering the site that recognise a particular landscape or visual importance. The site also lies outside the Green Belt.
- 4.2 A number of designations fall outside of the site boundary within the 2km study area. These are listed below and illustrated in Figures 5 and 6 opposite:
- There are several Grade II Listed Buildings in Dunston and a number scattered around the site.
  - The nearest Scheduled Monument is located in Acton Trussell, approximately 175m north east of the eastern boundary.
  - Cannock Chase AONB is located approximately 3.1km to the east of the site.
  - Cannock Chase Country Park lies approximately 3.5km to the eastern edge of the site.
- 4.3 Part of the site adjacent to the railway line and River Penk falls within Flood Zone 3.

### Local Planning Policy

### National Planning Policy

- 4.4 The National Planning Policy Framework (NPPF) was last updated by the Ministry of Housing, Communities and Local Government (MHCLG) in February 2019 setting out the Government's planning policies for England and providing a framework within which the appropriate local council can produce local and neighbourhood plans; the NPPF is a material consideration in planning decisions.
- 4.5 The NPPF sets out three dimensions to achieving sustainable development that include economic, social and environmental considerations. It places an onus on the planning system to "contribute to protecting and enhancing our natural, built and historic environment..." going on to note that sustainable solutions should take account of local circumstances and reflect the character of each area. This underpins the strategic guidance set out in the NPPF in relation to landscape and visual matters.
- 4.6 In relation to landscape and visual matters, achieving well- designed places (Section 12) aims to ensure that developments are 'visually attractive', are sympathetic to local character (including the surrounding built environment and landscape setting) and to establish and maintain a strong sense of place.
- 4.7 Section 15 of the NPPF addresses 'conserving and enhancing the natural environment' stating that policies and decisions should contribute to this by "(a) protecting and enhancing valued landscapes (noting that this should be commensurate with a statutory status

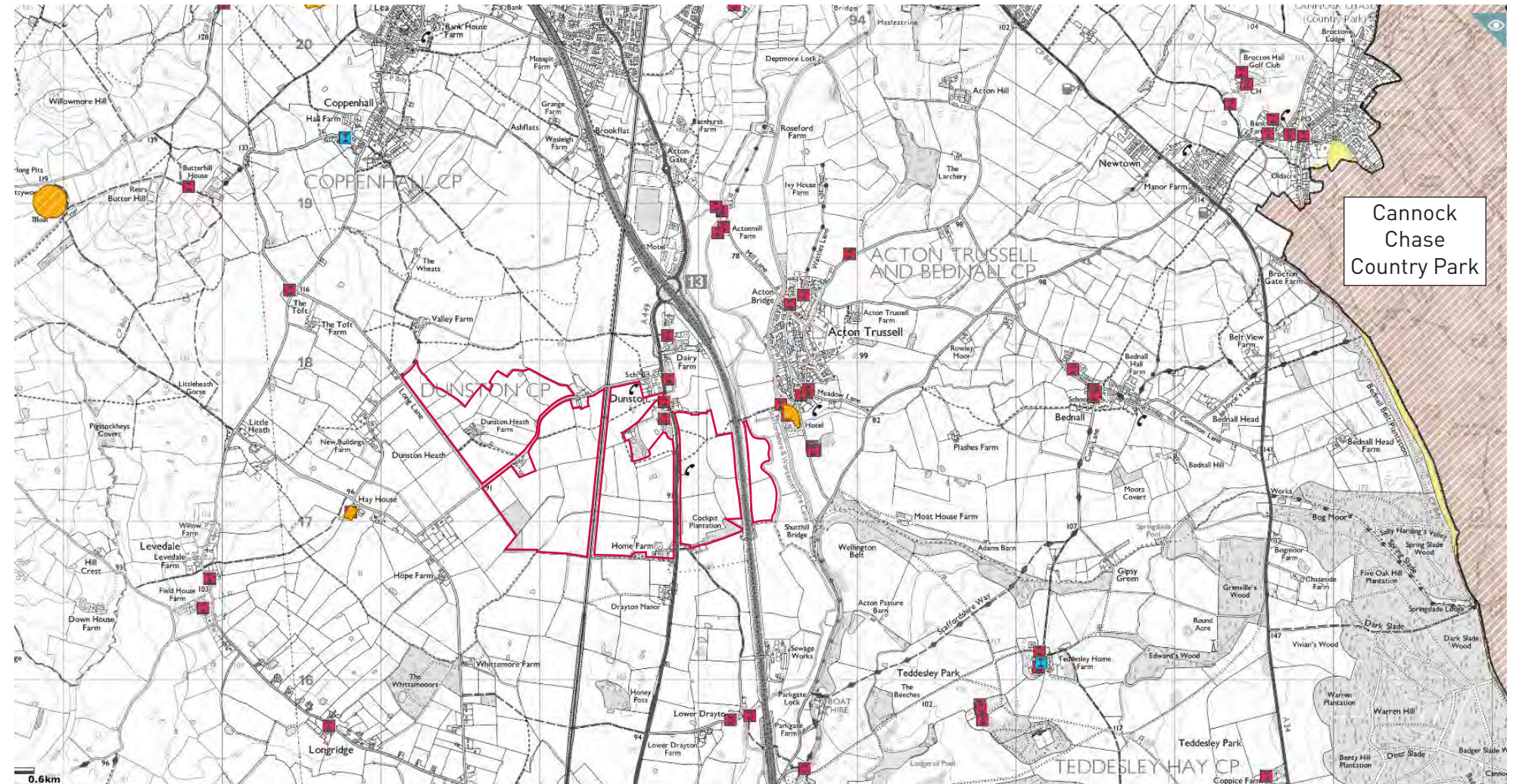


Figure 5: Magic map extract showing nearby designations

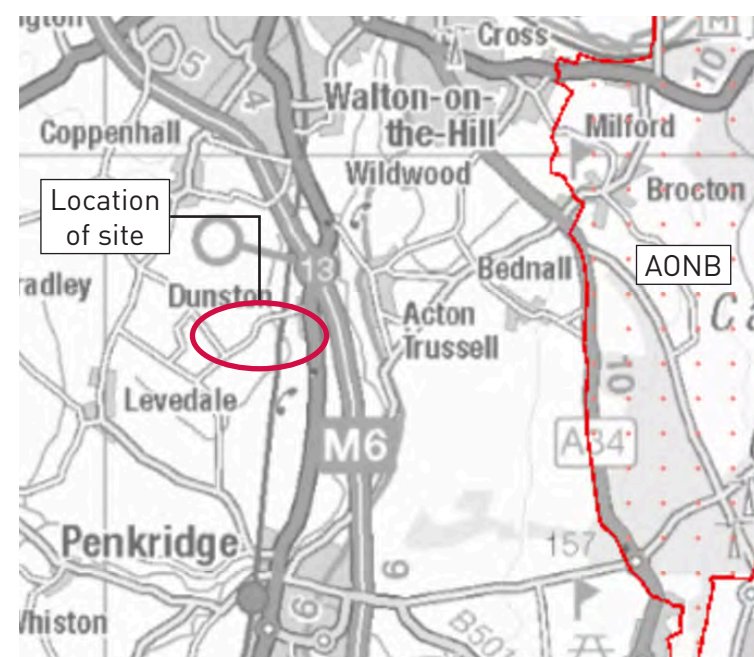
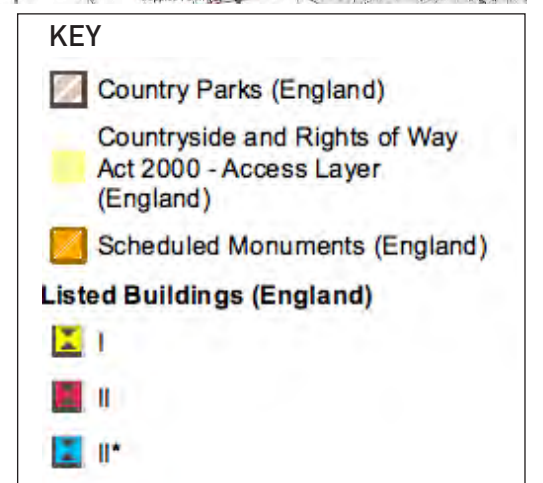


Figure 6: Magic map extract showing location of AONB in relation to site





- or identified quality identified in a development plan)” and also “(b) recognising the ‘intrinsic character and beauty of the countryside”.
- 4.8 The NPPF notes the importance that designs ‘evolve’ in response to local issues and to the views of the community.
- Local Planning Policy
- 4.9 The site lies within the administrative boundary of South Staffordshire Council. The site is located within an area identified as Open Countryside (Policy OC1) of the Core Strategy, adopted in 2012. The Local Plan is made up of two documents, the Core Strategy and the Site Allocations Document (SAD), adopted in September 2018.
- 4.10 The Council are currently consulting on the second stage of their Local Plan. This is focused on identifying broad locations for housing growth and the infrastructure required to facilitate this. The consultation period is for 8 weeks running up until 12th December 2019.
- 4.11 The policies within the plan of relevance to landscape and visual issues are summarised below.
- 4.12 The adopted Plan identifies a number of strategic policies. Under The Spatial Strategy, Strategic Objective 1 states that the Green Belt and Open Countryside should be protected and maintained to sustain the distinctive character of South Staffordshire. Strategic Objective 2 states that the current pattern of villages across South Staffordshire should be retained and reinforced to protect strategic gaps between existing settlements.
- 4.13 Under Environmental Quality, Strategic Objective 3 identifies the need to protect and improve South Staffordshire’s environmental assets, whilst Strategic Object 4 concerns the protection, conservation and enhancement of the countryside and the character and quality of the landscape.
- 4.14 Strategic Objective 15 discussed the improvement of “*outdoor and indoor leisure sport and recreation facilities [to] ensure that each community has access to sufficient areas of green space and built facilities*”.
- 4.15 The provision of play, leisure, sport and recreation opportunities for children and teenagers is addressed in Strategic Policy 16.
- 4.16 The Core Strategy also refers to other strategies such as the ‘A Community of Communities: A Sustainable Community Strategy for South Staffordshire 2008-2020’ covering topics such as environmental quality.
- 4.17 Following on from the strategic policies the plan leads on to Core and Development policies.
- 4.18 Core Policy 1 - The Spatial Strategy for South Staffordshire discusses the Open Countryside and states it “*will be protected and maintained for the Plan period but some land will need to be released from the Green Belt and Open Countryside in some locations at the Main and Local Service Villages to deliver the proposed development strategy*

*and enable the sustainable growth of these villages*”. Development Policy OC1: Development in the Open Countryside Beyond the West Midlands Green Belt, outlines further detail regarding development in Open Countryside.

- 4.19 Core Policy 2 - Protecting and Enhancing the Natural and Historic Environment states that the “*Council will support development ... where they protect, conserve and enhance the District’s natural and heritage assets including ecological networks internationally, nationally and locally important designations. Particular support will be given to initiatives to improve the natural environment where it is poor and increase the overall biodiversity of the District including the development of green infrastructure links ...*”. As part of development proposals should include “*mitigation or compensatory measures to address any potential harmful implications and support enhancement measures*”.
- 4.20 Policy EQ1: Protecting, Enhancing and Expanding Natural Assets explains that “*support will be given to proposals which enhance and increase the number of sites and habitats of nature conservation value, and to meeting the objectives of the Staffordshire Biodiversity Action Plan (SBAP)*”. The site falls under the Central Farmland Ecosystem Action Plan. The retention of hedgerows and hedgerow trees are discussed under the Priority Habitat section along with guidance on rivers. Maintaining the extent and condition of floodplain grazing marsh is also outlined along with the creation of broadleaved woodland.
- 4.21 The policy also states that “*development proposals must not adversely affect the ecological status of a water body and wherever possible take measures to improve ecological value in order to help meet the required status*”.
- 4.22 Policy EQ4: Protecting and Enhancing the Character and Appearance of the Landscape details several points regarding the character and appearance of the landscape. “*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. ... 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. ... Where possible, opportunities should be taken to add character and distinctiveness through the contribution of new landscape features*”.

- 4.23 Core Policy 4: Promoting High Quality Design states that all development is expected to achieve a high quality of design of their buildings and landscape setting and should “*b) respect and enhance local character and distinctiveness of the natural and built environment including opportunities to improve the character and quality of the area*”. Under point g) the policy also discusses the need to “*facilitate and encourage physical activity through outdoor sport, recreation (informal sport and play) walking and cycling*”.
- 4.24 Policies EQ11: Wider Design Considerations and EQ12: Landscaping provide detailed development policies that support Core Policy 4 covering issues such as protecting and enhancing key landscape features, open space proposals that reflect local landscape character, respecting local character and distinctiveness and development adjacent to waterways.
- 4.25 The Design Guide SPD was adopted in June 2018 as an update to the previous Village Design Guide. It covers a range of topics with the sole purpose to encourage good design. Chapter 4 covers major developments, from siting, building layout, landscape and boundaries.



## 05 LANDSCAPE BASELINE

- 5.1 A baseline study has been undertaken to record the character of the landscape and the elements, features and aesthetic and perceptual factors which contribute to it and to highlight any particular sensitivities that should be addressed in the masterplan.

### National Landscape Character Assessment

- 5.2 The site falls within National Character Area 61, Shropshire, Cheshire and Staffordshire Plain. This national level assessment gives a broad impression of a region and provides a useful contextual overview of the character of the wider landscape, however, for the purpose of this assessment a greater degree of focus has been given to the Landscape Character Assessment provided by Staffordshire Borough Council.

### Staffordshire Landscape Character Assessment

- 5.3 The Staffordshire Landscape Character Assessment was initially prepared to support the Staffordshire and Stoke on Trent structure plan. This has been revoked but still remains a material consideration. (It was updated in 2015 as the Draft Staffordshire Landscape Character Assessment but was not adopted and is not publicly available).
- 5.4 The assessment identifies regional character areas, generally based on the national character area profiles, sub-dividing these in to Landscape Character Types (LCT). The site falls within LCT Ancient Clay Farmlands. The characteristic landscape features are outlined below:

#### Visual Character

- 5.5 *"This is a landscape of mixed arable and pastoral farmland, the character of which is strongly influenced by existing land use and farming practices.*
- 5.6 *In the areas of pastoral farming an intact irregular ancient pattern of hedgerows and hedgerow trees is still retained. In places this pattern is beginning to break down, with hedgerows either being allowed to grow up and become ragged, or being mechanically trimmed and becoming gappy as a result. The mature hedgerow oaks are characteristic of this countryside and still numerous enough to coalesce visually and filter views across the landscape. ...*
- 5.7 *Throughout this landscape type, the varying tree and hedgerow density and landform give changing scales from medium to large. The gently rolling landform, with occasional high points, allows long distance views through the landscape to show up the landcover elements. ... Especially important in this landscape are the many marl pits, meres and mosses, now surrounded by mature trees, and the series of small brooks. These, and canals running through the area, are picked out by lines of willow, poplar and alder, providing some structure in the more open arable areas.*

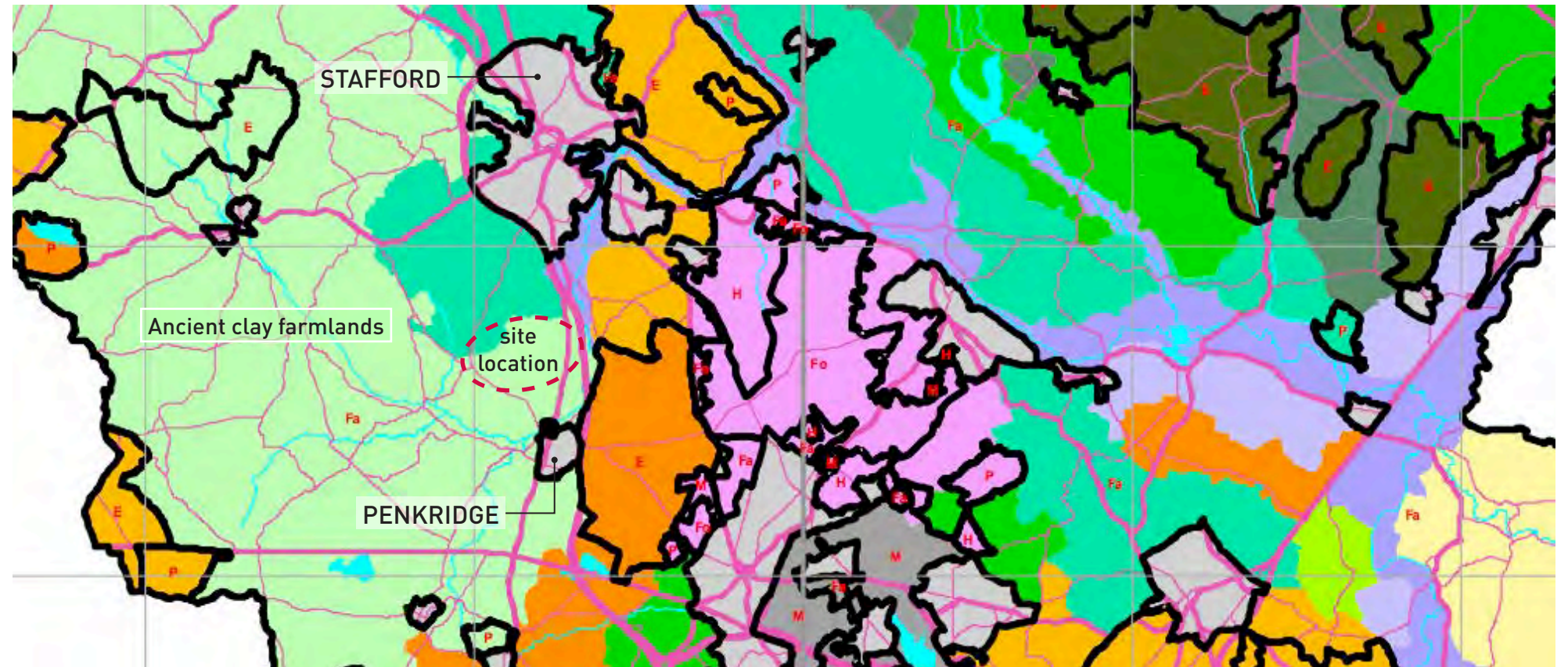


Figure 7: Staffordshire LCT Map extract

- 5.8 *Areas associated with villages are generally less intensively farmed and the scale is reduced by broadleaved linear woodlands. These divide the landscape into small discrete units and give a well-balanced interlock between the farmland and woodland elements. In these areas of smaller scale the field pattern is predominantly irregular, with dense mixed hedges and hedge banks. On areas of old common the hedgerows form a more regular pattern in the landscape. ...*

- 5.9 *Major road corridors have a significant localised effect and result in some areas being particularly well viewed".*

#### Characteristic landscape features

- 5.10 *"Mature hedgerow oaks and strong hedgerow patterns; narrow winding lanes, often sunken; small broadleaved and conifer woodlands; well treed stream and canal corridors; hedgerow damsons; occasional native black poplars; numerous farmsteads, cottages, villages and hamlets of traditional red brick; a gently rolling landform with stronger slopes in places; dispersed settlement pattern; halls and manors; marl pits and field ponds; meres and mosses."*

#### Incongruous landscape features

- 5.11 *"Busy main roads and motorway; powerlines; stag headed over-mature oaks; some conifer and poplar plantations; horseyculture; large modern farm buildings; industrial developments; electrified railway line; urban edge; improved and new commuter dwellings; introduction of wire fencing for stock control associated with deteriorating field pattern".*

#### Factors critical to landscape character and quality

- 5.12 *"The critical factors which currently limit landscape quality are the loss of characteristic landscape features (especially hedgerows and hedgerow trees), the poor condition of those features that remain, and the relatively poor survival of characteristic semi-natural vegetation (i.e. ancient woodland and hedgerows, semi-natural grasslands and riparian and wetland vegetation)".*



**South Staffordshire Landscape Sensitivity Assessment (July 2019)**

5.13 This Landscape Sensitivity Assessment (LSA) was commissioned by several councils including South Staffordshire Council. The LSA forms an important piece of evidence for the preparation of the second stage of the South Staffordshire Local Plan. For each assessment area the study highlights the likely landscape and visual sensitivities, identifying those which are more or less likely to accommodate development.

5.14 The site falls across assessment areas SL90, SL91, SL92 and SL93 (see Appendix 2 for extracts of each area). Each are given the following Landscape Sensitivity Ratings and Judgements:

- **SL90 : Moderate - High** - “The floodplain character of the area, which includes the meandering course of the River Penk, has value from a scenic, priority habitat and historic perspective, and provides part of the wider rural setting to Acton Trussell and several designated heritage assets. Whilst the proximity to the M6 limits the area’s sense of rurality and tranquillity, these attributes indicate a moderate-high overall sensitivity to residential development”.
- **SL91 : Low - Moderate** - “The area is judged to have an overall low-moderate sensitivity to residential and employment development, due to its location between busy roads and limited valued natural features”.
- **SL92 : Moderate** - The landscape is judged to have an overall moderate sensitivity to residential development due to a combination of its location in close proximity to the busy A449, M6 and railway line; the flat topography of the area, small and medium scale fields and frequent intact hedgerows and hedgerow trees.
- **SL93 : Moderate** - The landscape is judged to have an overall moderate sensitivity to residential development due to a combination of fields that are moderate to small in scale with frequent, mature hedgerow trees, broadly flat topography, some 20th century field enlargements and some public rights of way. The M6 visible and audible in the distance; it is not a visually prominent area.

5.15 The sensitivity assessments given to the areas discussed above are generally in line with the observations made during the site visit undertaken in November 2019.

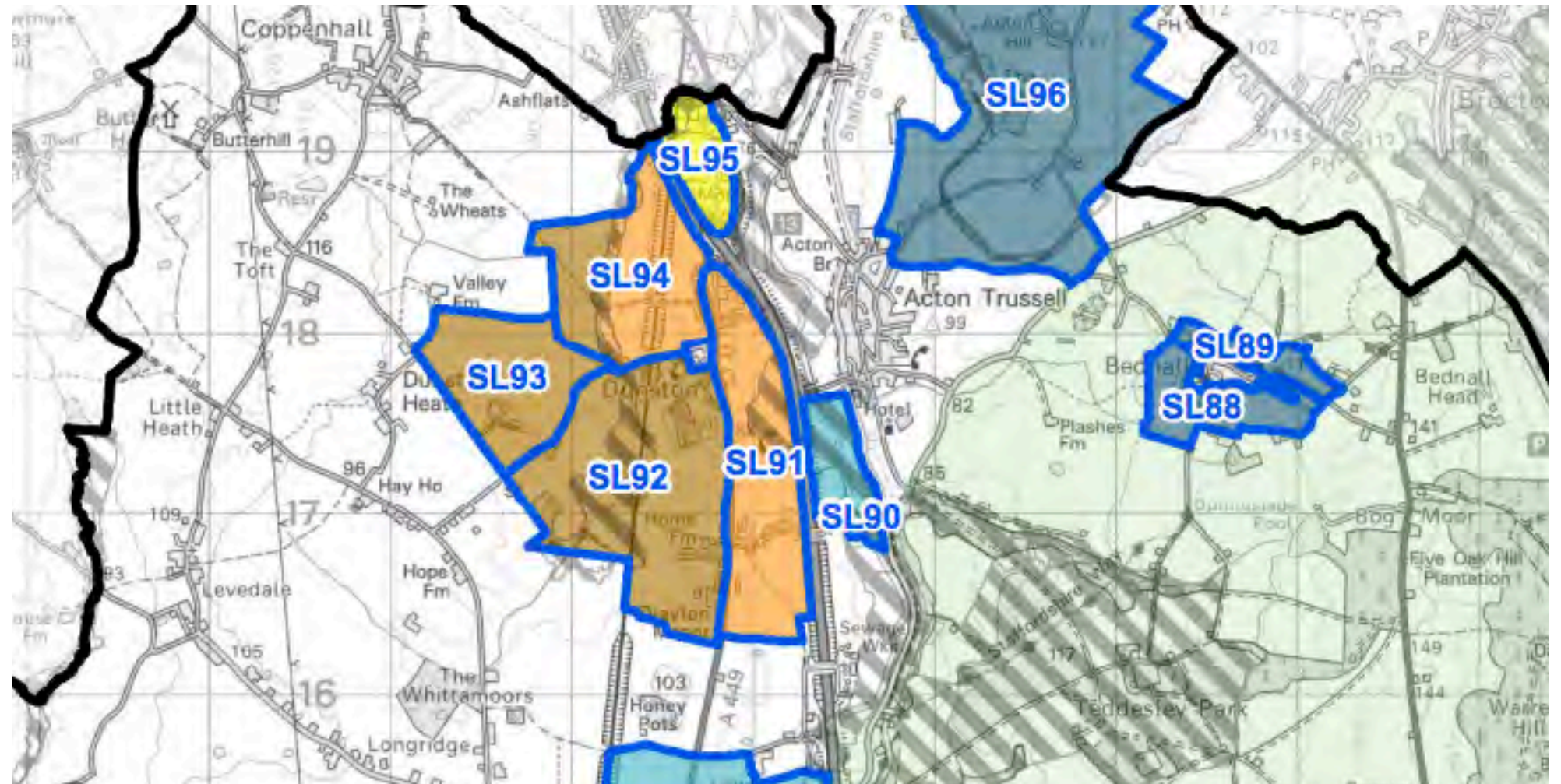
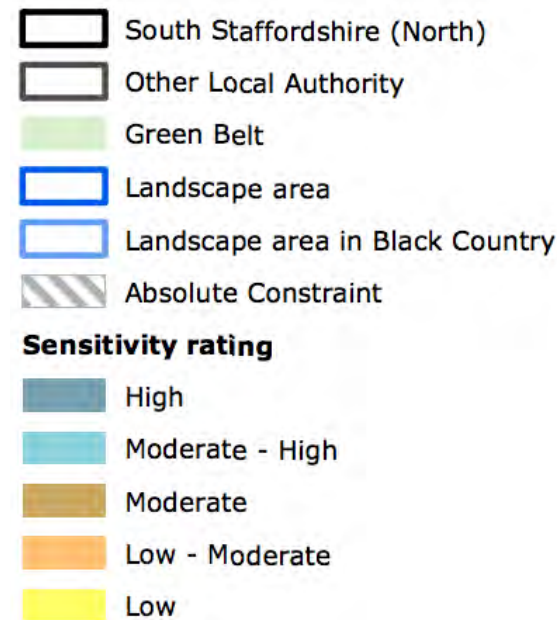


Figure 8: Extract of Figure 4.2, South Staffordshire Landscape Sensitivity Assessment (2019)





## 06 VISUAL BASELINE

- 6.1 A site visit in November 2019 demonstrated that the visibility of the site within the local area was fairly limited in most directions considering the size of the site and proposed development. This is due to a combination of features including existing built form and vegetation as well as topography.
- 6.2 The photographs included in Appendix A illustrate the nature of existing views from publicly accessible locations such as roads and footpaths within the landscape surrounding the site, their locations are shown on Figure 7.
- 6.3 In order to assist with understanding the potential visibility of the scheme from the surrounding landscape, a digital Screened Zone of Theoretical Visibility (SZTV) was generated as a starting point to demonstrate the geographical area within which views are theoretically possible. This is illustrated opposite.
- 6.4 The SZTV takes account of existing built form and blocks of woodland / trees that appear on OS Open Map (shown in green on the plan opposite). Key areas of proposed boundary vegetation have been added in to the model at a height of 15m to give a more accurate representation of visibility in the area (shown in blue). All development cells have been modelled in at a height of 10m.
- 6.5 Generating a ZTV is a useful tool to provide an initial indication of the receptors that are likely to be affected by the proposed development, however, verification of this should always be undertaken on site.
- 6.6 The text below discusses the key receptors within the vicinity of the site.

### Screened ZTV Production Information -

- DTM data used in calculations is OS Terrain 5 that has been combined with OS Open Map Local data for woodland and buildings to create a Digital Surface Model (DSM).

- Indicative woodland and building heights are modelled at 15m and 8m respectively.
- Viewer height set at 1.7m  
(in accordance with para 6.11 of GLVIA Third Edition)
- Calculations include earth curvature and light refraction

N.B. This Zone of Theoretical Visibility (ZTV) image illustrates the theoretical extent of where the development may be visible from, assuming 100% atmospheric visibility, and includes the screening effect from vegetation and buildings, based on the assumptions stated above.

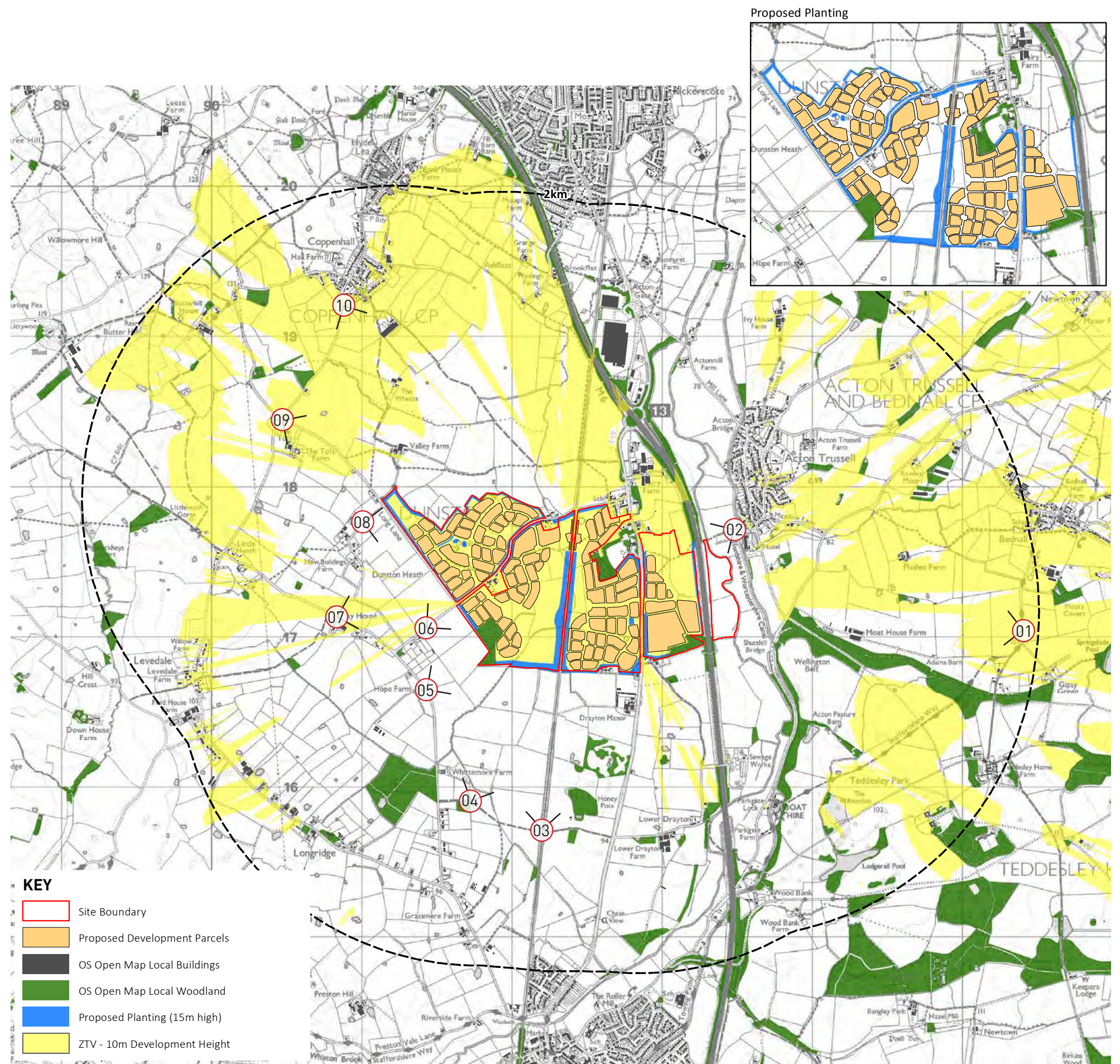


Figure 9: SZTV and viewpoint locations



Views from the local road and rail network

- 6.7 Views from the local road network vary considerably depending on the proximity to the site and their character. The larger roads such as the M6 and A449 that pass between parcels D and E, and C and D respectively both have views across parts of the site east of the railway line.
- 6.8 The less busy, local roads tend to be more rural in character, many with hedgerows and hedgerow trees, some raised upon hedge banks that prevent views across the landscape, focusing the eye along the road (see viewpoints 06 and 09 for examples). School Lane, Long Lane, Stoney Lane, Whittamore Lane and the road between Copenhall and Levedale have hedgerows lining most of them, although, in some places they are being maintained at a low height opening up some views over the surrounding landscape and of the site, mainly parcels A and B (see photograph C in Chapter 2).
- 6.9 Further west the A34 runs along the western boundary of Cannock Chase AONB. The road is generally lined with a mix of hedgerow and trees with blocks of woodland between the road and the site, limiting views to the west. Cock Lane runs west of the A34, running south from Bednall. There are some locations along it where views towards the site are possible although these are broken by intervening blocks of woodland (see Viewpoint 1).
- 6.10 Passengers travelling by train between Penkridge and Stafford will experience views of the site both to the east and west.
- 6.11 The sensitivity for the different road users is as follows:
- users of trunk/major roads & passengers on commercial railway lines = low
  - users of minor roads which do not appear to be used primarily for recreational activities or the specific enjoyment of the landscape = medium
  - users of minor roads which appear to be used for recreational activities or the specific enjoyment of the landscape = high

Views from Public Rights of Way (PRoW)

- 6.12 Views from the public right of way network also vary considerably. The footpaths located to the north west of the site are likely to experience views of the site due to rising landform in this direction. Mature trees along field boundaries in this area will however help to filter some views as they coalesce visually across the landscape. Viewpoint 10 illustrates the view from a highpoint south of Copenhall on Footpath 'Copenhall 9a'.
- 6.13 To the west footpath 'Dunston 14' and bridleways 'Dunston 10', 'Dunston 11' and 'Dunston 12' are less likely to experience views of the site due to intervening built form and vegetation.
- 6.14 To the south lies bridleway 'Penkridge 33'. It runs west from the A449 crossing the railway by bridge towards Whittamore Lane. Views from

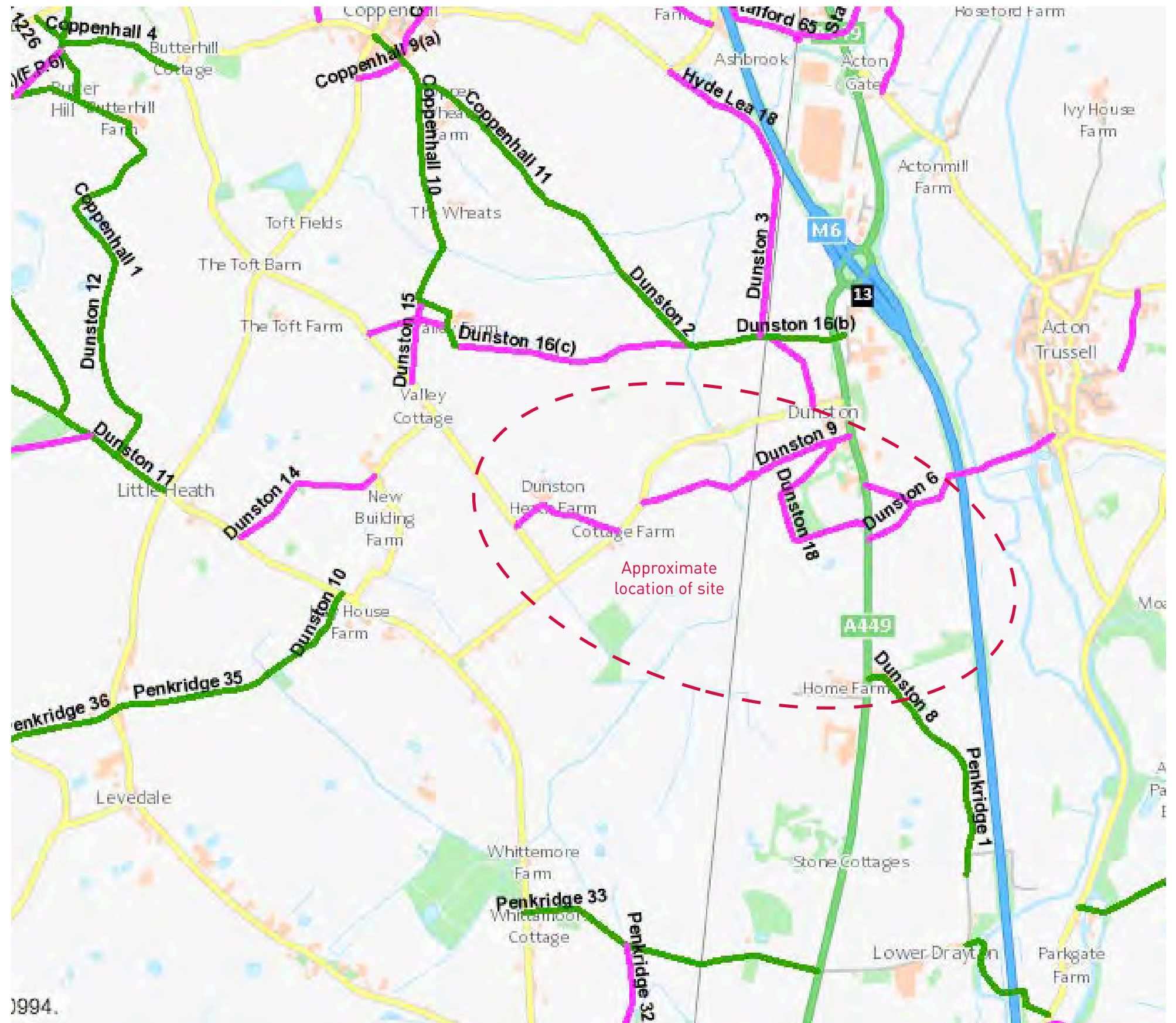


Figure 10: Extract from South Staffordshire Countryside Access and Rights of Way map



this footpath vary, in some places views were restricted by large crops at the time of the site visit, in other locations intervening vegetation filter or partially screen views towards the site. Viewpoint 03 illustrates a view towards the site close to Whittemore Farm, whilst Viewpoint 04 illustrates a view from the bridge crossing. Bridleways 'Penkridge 1' and 'Dunston 8' have restricted views towards the site due to mature trees along the majority of the route. It is not until emerging at the very north of the route on to the A449 that a view of the site is opened up.

6.15 To the east footpath 'Acton Trussell and Bednall 2' runs up to the eastern boundary of the site, receptors using this footpath will be able to view parcels D and E of the site and the eastern edge of parcel C (see Viewpoint 02). Further east rights of way tend to have limited views towards the site due to intervening woodland and tree groups. Part of the Staffordshire Way runs east of the site, views from it towards the site are generally limited by intervening vegetation. There are some locations along Cock Lane where views towards the eastern part of the site are available between woodland (see Viewpoint 01).

6.16 Several footpaths pass through various parts of the site itself. It is inevitable that receptors travelling along these will experience views of development. Photographs C, F, H and illustrate a range of views from within the site.

6.17 The sensitivity of users of PRoW is considered to be high.

#### Views from residential receptors

6.18 Residential properties around the site are generally grouped in small clusters or on scattered farmsteads. The views of the site that each property will experience will vary depending on their setting and location within the landscape.

6.19 Properties within Dunston on Church Close and extending along School Lane to the west will inevitably experience views of the site. Some are set within gardens that contain mature trees which may lessen the extent to which views are available. Similarly, a small number of existing properties on Swan Lane are located on the southern boundary of the site and will experience views over the site. Properties located on Old Vicarage Lane, opposite the south eastern corner of the site are generally set within mature gardens, however, it is possible that receptors within the dwelling will experience views to some degree.

6.20 There are a number of properties dotted along Whittamore Lane that may have views towards the site, those orientated towards the site, with an open aspect are more likely to, particularly from upper floor windows.

6.21 Stoney Lane runs between Long Lane and Whittamore Lane, there are several properties dotted along it with potential views of the site. Similarly on Long Lane there are a few properties located at the north western corner of the site that will inevitably experience views of the proposed development.

6.22 The unnamed road that runs between Levedale and Coppenhall has relatively few residential properties along it. Farmsteads such as The

Wheats and The Toft Farm are accessed from this road and dwellings here could potentially have views of the site, although some filtering may occur from the layering of mature hedgerow trees along multiple field boundaries. The properties along this road located in Little Heath appear to be set in mature gardens and may be less likely to experience views towards the site. There are number of properties along Levedale Road, south west of the site. These are over 1km away and it is possible that the layering effect of field boundary vegetation will greatly restrict views towards the site for many of the properties. The woodland at The Whittamoors will also provide good screening to some properties.

6.23 Generally, properties within Coppenhall are unlikely to have views of the site due to the screening effect of other built form within the village. Those located on the southern edge are more likely to experience views from the elevated position they take. Viewpoint 10 was taken close to some of these properties on footpath 'Coppenhall 9a'.

6.24 Properties within Acton Trussell, east of the site are less likely to experience views of the site. Those on the western edge are set on lower land along the wooded canal. Receptors within properties further east in to the village are likely to have views screened by surrounding built form.

4.26 The sensitivity for residential receptors is considered to be high.



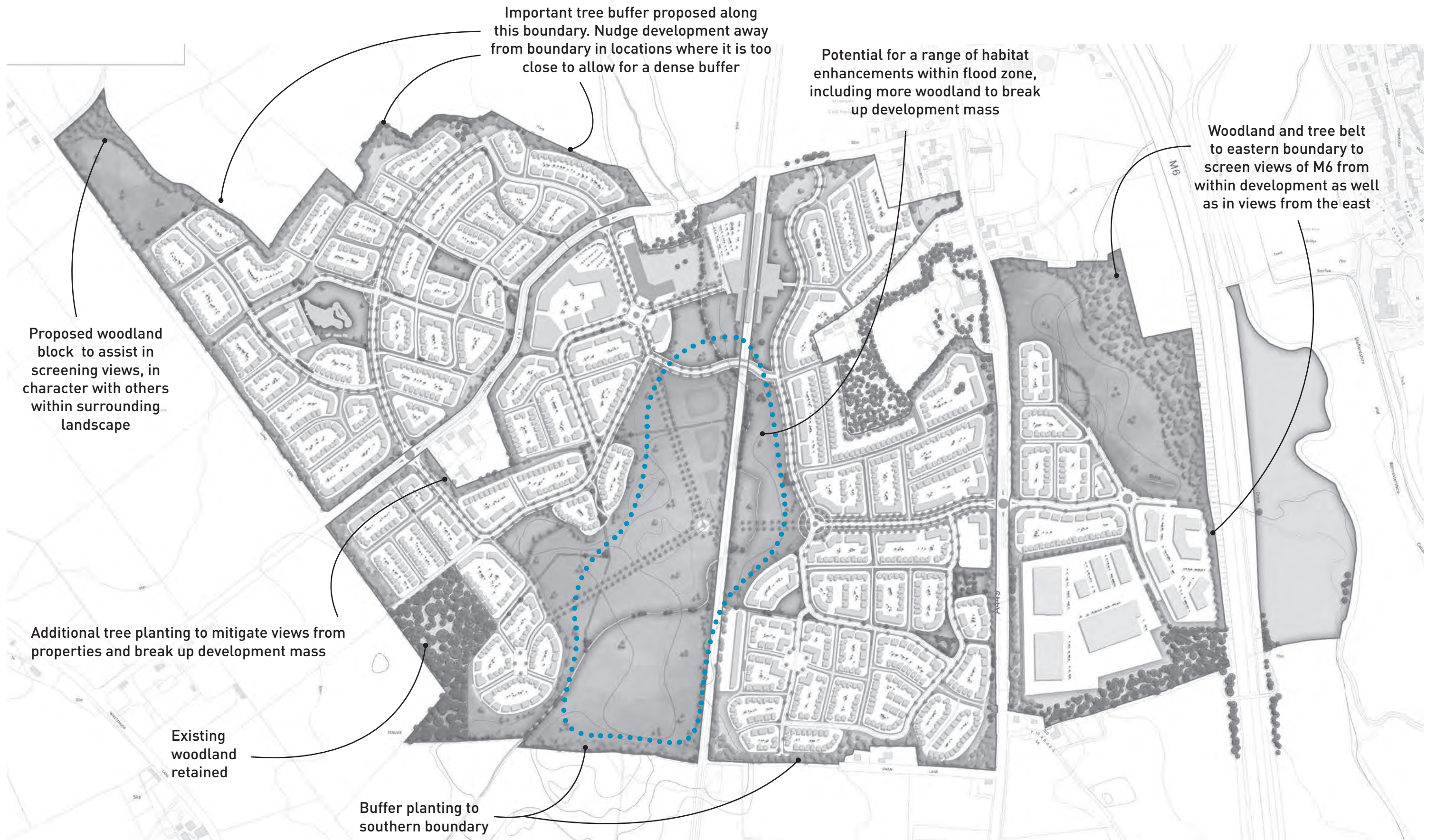


Figure 11: Landscape Framework Recommendations



## 07 LANDSCAPE FRAMEWORK RECOMMENDATIONS

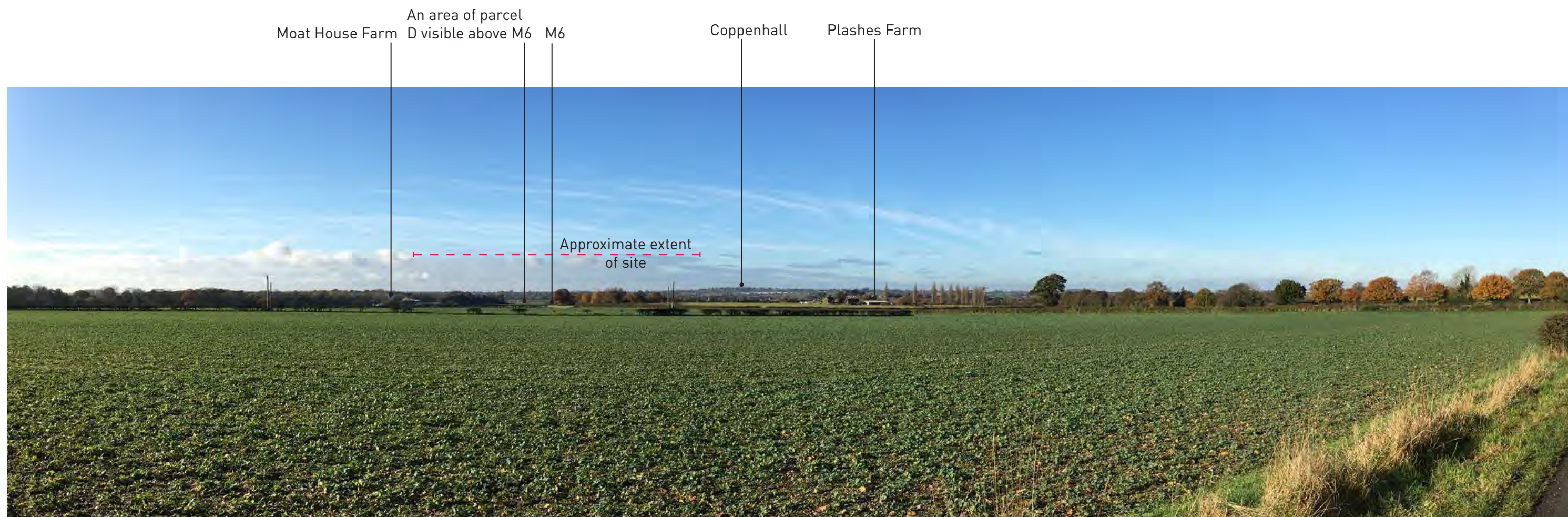
- 7.1 The plan opposite highlights the key mitigation features that have been introduced as a result of the findings of this Appraisal.
- 7.2 The mitigation measures feed in from information gained from the desktop research undertaken and experience gained from visiting the site and surrounding landscape. They aim to mitigate as far as possible any potential landscape or visual issues that may arise as a result of development.
- 7.3 The most sensitive views are from the north west, the treatment of the boundary along the north western edge of the site is important in mitigating development in these views. Figure 11 shows the proposed continuous buffer in this location. Where appropriate a larger block of woodland has been suggested in keeping with others in the surrounding landscape. Development is set back from this boundary to allow room for a substantial tree belt to be planted.
- 7.4 Key blocks of existing woodland have been retained and where possible existing trees and hedgerows along field boundaries have been retained. This along with the proposed avenue and street tree planting will all help in breaking up the mass of development. As trees mature the development will appear to be set within woodland. Introducing tree planting around existing properties on School Lane will also help to mitigate some views from these dwellings as well as adding to the overall leafy character of the site.
- 7.5 Planting along the southern boundary is proposed to strengthen this. There is also a good opportunity to enhance the habitat within the floodplain; including introducing some woodland to act as a wooded backdrop to development and break up the development mass.
- 7.6 Additional woodland and tree belt is proposed along the eastern boundary to screen views of the M6 from within the site but also soften the development edge where there are views of the site from the east.

## 08 SUMMARY

- 8.1 This Landscape and Visual Statement has identified the sensitivities of the site and surrounding landscape in terms of landscape character, landscape features and visual receptors.
- 8.2 The situation of the site, from the relatively flat topography, the character of vegetation within the area surrounding the site and existing infrastructure presents a strategic site that could be delivered with reasonably limited harm to landscape character or visual amenity with potential for strong mitigation proposals in line with Core Policy 2.
- 8.3 The annotated masterplan in Figure 11 has been informed by the desk top study and site work that has been undertaken. It draws on the recommendations made in both policy and the Staffordshire Landscape Character Assessment about respecting local character of the landscape and its features such as hedgerows, hedgerow trees and woodland, the addition of new landscape features and consideration of development adjacent to waterways.
- 8.4 Visually, the site is relatively well contained considering the overall size of the site and the suggested development proposals. Towards the north west views are more likely due to landform rising in this direction, however, intervening hedgerow trees provide a good level of filtering from lower levels in some places. To the east views are limited due to existing built form in the village of Acton Trussell and the abundance of woodland. To the south views are generally well filtered, and in some places screened by the layering of hedgerow trees and woodland blocks. Similarly, views of the site from the west were found to be limited due to intervening vegetation and roads lined with mature hedgerows.
- 8.5 In terms of mitigation, a strong buffer of planting around the site boundaries generally will go along way in limiting the effect of the development in on the character of the immediate surroundings and on the range of visual receptors. Development is proposed to be set back from boundaries to allow space for a strong tree buffer, that will in time create a good visual screen.
- 8.6 In summary the site comprises pastoral and arable fields with hedgerows and hedgerow trees defining field boundaries. The site is divided by local roads such as School Lane, the A449, M6 and a railway line. A block of mature woodland is located in the south western corner of the site. Dunstan Heath Farm is situated within the western area of the site. It located close to good road infrastructure with good potential for pedestrian links in to the wider countryside.

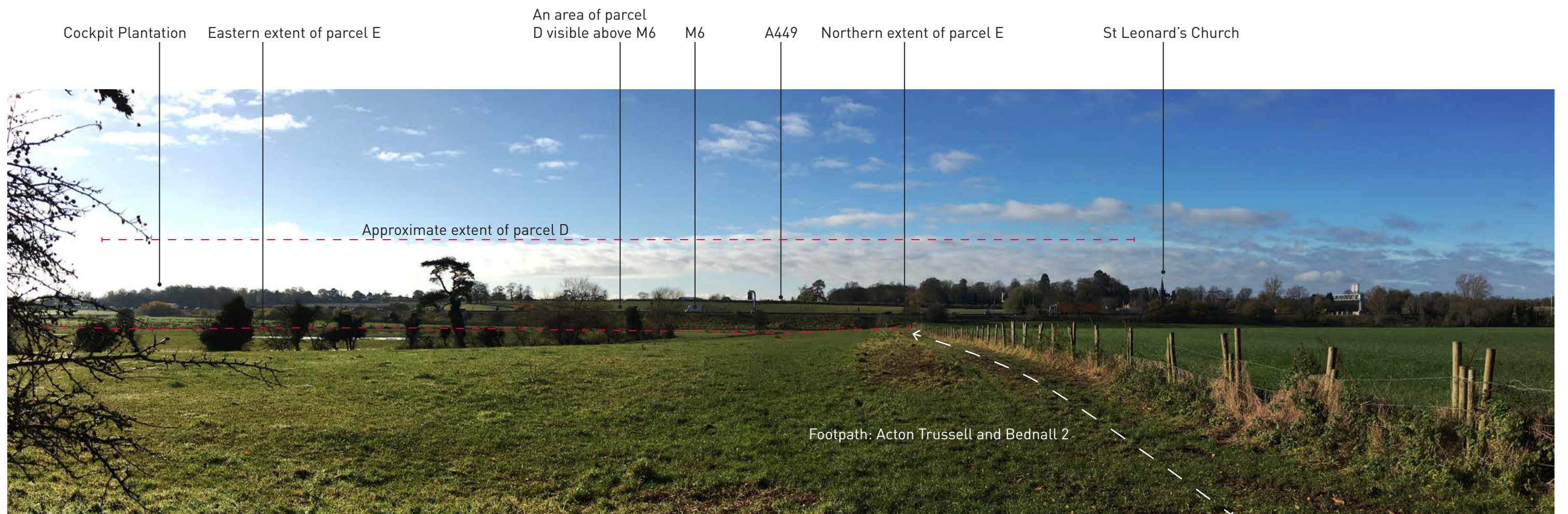
- 8.7 Although a development of this scale will inevitably have an impact on views from the surrounding area and on landscape character; with the proposed mitigation planting, the scheme could be set within a framework of mature trees and woodland that could greatly reduce any potential impact on the surrounding landscape character and visual receptors. The main receptors are users of public rights of way, particularly to the north west, local road users and some residential properties that are scattered through the surrounding landscape.

## APPENDIX A - PHOTOGRAPHIC RECORD



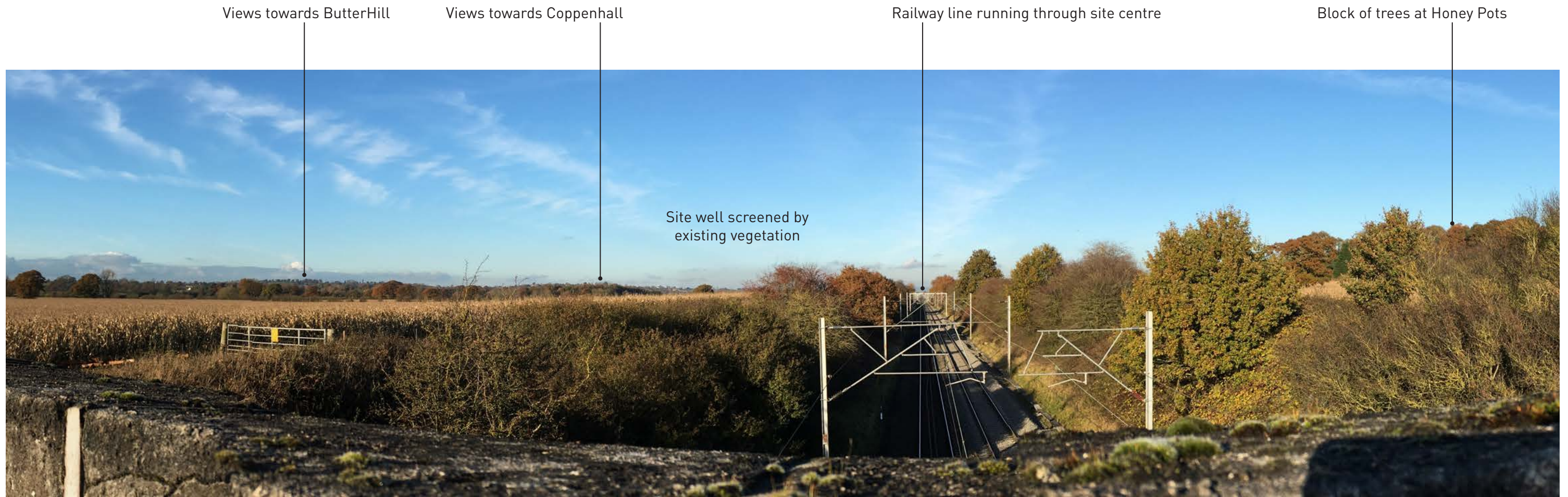
**Viewpoint 01** : View looking west from Cock Lane and the Staffordshire Way





**Viewpoint 02** : View from Footpath Acton Trussell and Bednall 2 looking west over eastern most area of site





**Viewpoint 03** : View looking north from bridge over railway line on Bridleway Penkrige 33



Copse of trees located within site in south western corner

Railway line running through site centre

Block of trees at Honey Pots

Southern site boundary located three fields away to north



**Viewpoint 04 :** View looking north east from Footpath Penkrige 33 south east of Whittemore Farm



Outbuilding located near residential properties at western end of School Lane

Copse of trees located within site in south western corner



**Viewpoint 05 :** View taken from a gap in the hedgerow on Whittemore Lane looking north east adjacent to Hope Farm



Approximate direction of Dunston Heath Farm located within parcel A

Copse of trees located within site in south western corner



**Viewpoint 06** : View looking north east along School Lane



Approximate direction of Dunston Heath Farm

Copse of trees located within site in south western corner

Residential properties on School Lane (western end)



**Viewpoint 07** : View looking north east adjacent to Hay House on Stoney Lane



Outbuilding located near residential properties at western end of School Lane

Copse of trees located within site in south western corner



**Viewpoint 08** : View looking south east from Stoney Lane



Outbuilding located near residential properties at western end of School Lane

Copse of trees located within site in south western corner



**Viewpoint 09 :** View looking south east from the north western end of Long Lane



Outbuilding located near residential properties at western end of School Lane

Copse of trees located within site in south western corner



**Viewpoint 10** : View looking south east from the edge of Coppenhall on Footpath Coppenhall 9(a)



## Appendix 4 – Flood Risk Appraisal – Weetwood



# Dunston Garden Village

## Preliminary Appraisal of Flood Risk and Surface Water Drainage

### Briefing Note

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<b>Job Ref:</b>	4696 Dunston Garden Village
<b>Prepared by</b>	Keely Bonser BSc MSc PhD <i>Associate Director</i>
<b>Approved by</b>	Kevin Tilford BSc MSc PhD MBA C.WEM MCIWEM <i>Managing Director</i>
<b>Date:</b>	10 December 2019
<b>Version:</b>	Final v1.1

#### Introduction

1. This document has been prepared by Weetwood Services Ltd on behalf of Rigby Estates LLP.
2. This document presents a preliminary appraisal of flood risk and drainage and of the implications for flood risk mitigation and of relevant planning considerations to support the promotion of land known as "Dunston Garden Village" at Dunston, Staffordshire ("the site") for residential led mixed use development.
3. An illustrative masterplan indicates that the proposed development may consist of:
  - Up to 3,000 dwellings;
  - Employment area with direct connection to the A449;
  - New railway station on the West Coast Mainline (WCML);
  - School and mixed commercial area/local centre providing local education/retail and community services; and
  - Open space.
4. The appraisal presented in this Briefing Note has been based on modelled flood levels for the River Penk provided by the Environment Agency on 26 November 2019 in response to a data request submitted on 31 October 2019.
5. The risk of flooding from Pothooks Brook, surface water, groundwater and reservoirs is based on a review of the information presented on a number of websites (referenced in document). The risk of flooding from canals, sewers and highway drains has not been assessed.

#### Site Details

6. The 163 ha site is located on greenfield land at Dunston, Staffordshire at Ordnance Survey National Grid Reference SJ 923 173 (see **Figure 1**).
7. The site is located between the River Penk along the eastern boundary of the site and Long Lane along the western boundary. The M6 and the A449 run through the eastern portion of the site. The WCML and Pothooks Brook (an ordinary watercourse) run through the centre of the site and School Lane runs through the western portion of the site.
8. A digital terrain model (DTM) of the site has been developed using LiDAR data (**Figure 2**). This information has been analysed to determine the topography of the site and wider area.

9. Whilst LiDAR data provides a good indication of ground levels, the data does not have the same accuracy as site topographical survey information. Also, small scale features can appear to be lower than is actually the case due to the size of the LiDAR cells. As such, all flood levels stated in this briefing note should be regarded as indicative only.
10. The terrain map indicates that a ridge line is present predominantly along the alignment of the A449. For the purposes of this appraisal, the site has been divided into two catchments based on the topography of the land (see **Figure 3**); Catchment A to the west of the A449 and Catchment B to the east of the A449. Ground levels are indicated to be as follows:
  - Catchment A: Ground levels are generally shown to be in the region of 82.0 to 95 metres Above Ordnance Survey Datum (m AOD) with levels falling towards Pothooks Brook; and
  - Catchment B: Ground levels are generally shown to be in the region of 75.0 to 91.0 m AOD with levels generally falling in a north-easterly direction towards the M6 and the River Penk.
11. National Soils Research Institute mapping<sup>1</sup> classifies soil conditions at the site and within the surrounding area as loamy and clayey soils. According to British Geological Survey (BGS) mapping, groundwater levels adjacent to the River Penk and Pothooks Brook are indicated to be high.
12. BGS mapping<sup>2</sup> indicates the underlying bedrock to comprise of mudstone and halite-stone (Mercia Mudstone Group) within the centre and eastern portion of the site and Stafford Halite Member within the far western portion of the site. This is indicated to be overlain by deposits of glacial till predominantly to the west of Pothooks Brook, sand and gravel predominately adjacent to the M6 and alluvium (clay, silt, sand and gravel) adjacent to the River Penk. Superficial deposits are not recorded within the remainder of the site.

## Overview of Flood Risk

### Fluvial Flood Risk

13. The Environment Agency does not hold any records of historical flood events within the vicinity of the site and there are no reported instances of flooding in the Southern Staffordshire Strategic Flood Risk Assessment (SFRA, 2019) report.
14. Flood Zones refer to the probability of river and sea flooding, ignoring the presence of flood defences. The National Planning Practice Guidance (NPPG) defines the flood zones as follows:
  - Flood Zone 1 ('Low Probability'): Land having a less than 1 in 1,000 annual probability of river flooding.
  - Flood Zone 2 ('Medium Probability'): Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding.
  - Flood Zone 3 ('High Probability'): Land having a 1 in 100 or greater annual probability of river flooding or 1 in 200 or greater annual probability of flooding from the sea.
15. Flood Zones are shown on the Flood Map for Planning. The flood extents presented on the do not account for the potential future effects of climate change but do take into account the presence of formal flood defences.

<sup>1</sup> [www.landis.org.uk/soilscapes/](http://www.landis.org.uk/soilscapes/)

<sup>2</sup> <http://mapapps.bgs.ac.uk/geologyofbritain/home.html>



16. According to the Flood Map for Planning (**Figure 4**) Catchment A and B are located within the following flood zones:
  - Catchment A: Flood Zone 3 (approx. 25%), Flood Zone 2 (approx. 1%) and Flood Zone 1 (approx. 74%)
  - Catchment B: Flood Zone 3 (approx. 35%), Flood Zone 2 (approx. 5%) and Flood Zone 1 (approx. 60%)
17. The implications of this flood zone categorisation on the potential future development of the site are summarised later in this document.
18. The Environment Agency has not developed a hydraulic model of Pothooks Brook. As such, the flood zones are likely to have been derived by application of the National Generalised Method.
19. The Environment Agency developed a hydraulic model of the River Penk in 2011 ("Sow and Penk Visualisation Model") and has provided modelled peak river levels for the present day 1 in 100, 1 in 200 and 1 in 1,000 annual exceedance probability (AEP) events, and the 1 in 100 plus 20% climate change (+CC) AEP event. The peak levels are presented on **Table 1** for the model nodes presented on **Figure 5**.

**Table 1: River Penk Modelled Flood Levels**

Model Node	Annual Probability Flood Level (m AOD)			
	Present Day			Climate Change
	1 in 100	1 in 200	1 in 1,000	1 in 100+CC (20 %)
P71	76.45	76.53	76.74	76.58
P71.1	76.39	76.48	76.69	76.53
P71.2	76.30	76.39	76.61	76.45
P72	76.22	76.32	76.54	76.37
P72.1	76.18	76.28	76.51	76.34
P72.2	76.14	76.24	76.48	76.30
P73	76.04	76.14	76.37	76.20
P73D	75.98	76.08	76.29	76.14
P73.1	75.58	75.66	75.84	75.71

20. Based on the above and an assessment of the DTM (**Figure 2**), Catchment B would be expected to flood as depicted on the Flood Map for Planning (**Figure 4**) during the 1 in 100 and 1 in 1,000 AEP events. When taking climate change into account, a comparison of the DTM and the Flood Map for Planning indicates that the extent of flooding within Catchment B would remain within the Flood Zone 2 extent.

#### Risk of Flooding from Surface Water

21. The Flood Risk from Surface Water maps (**Figure 6** and **Figure 7**) indicate the following:
  - Catchment A: A number of flow paths are indicated to cross the catchment in the event of a severe storm event (>1 in 100 AEP), including two predominant flow paths; one along the alignment of Pothooks Brook and the second to the north of the site flowing in an easterly direction towards Pothooks Brook. For less extreme events, the risk and extent of flooding is significantly less. The maximum depth of

flooding is indicated to be up to 900 mm, although the deepest flooding is along the alignment of Pothooks Brook and associated with the ponding of surface water runoff in localised low spots.

- Catchment B: The majority of the catchment is indicated to be at Very Low risk of surface water flooding. In the event of a severe storm event (>1 in 100 AEP) a small area to the west and east of the M6 is indicated to be at Low to Medium risk of flooding up to a maximum depth of 900 mm; the area to the west of the M6 coincides with a low spot within the topography. For less extreme events, the risk and extent of flooding is not significant.

#### Risk of Flooding from Reservoirs

22. The Risk of Flooding from Reservoirs map (**Figure 8**) indicates part of Catchment B to be potentially at risk of flooding in the event of a failure of the reservoir impounding structure. However, all large reservoirs are regularly inspected by reservoir panel engineers with essential safety work carried out. As detailed on the gov.uk website, reservoir flooding is therefore extremely unlikely to occur.

#### Risk of Flooding from Groundwater

23. According to the Groundwater flood map produced by JBA Risk Management (**Figure 9**):
  - Catchment A: The catchment is at Negligible risk of ground water flooding.
  - Catchment B: Shallow groundwater is indicated within the southern portion and through the centre of the western portion of the catchment (<0.025 m to 5.0 m below the ground surface in the 1 in 100 year groundwater flood event) – associated with superficial deposits of sand and gravel.

### Planning Considerations

#### National Planning Policy

24. The aim of the National Planning Policy Framework (NPPF) is to ensure that flood risk is taken into account at all stages in the planning process and is appropriately addressed.
25. Paragraph 155 of the NPPF states that *"inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere"*.
26. This policy is implemented through the application of the sequential test (NPPF paragraph 158).
27. Paragraph 159-161 of the NPPF states:
28. *"If it is not possible for the development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives) the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in the national planning guidance" (Paragraph 159).*
29. *"The application of the exception test should be informed by a strategic or site-specific FRA, depending on whether it is being applied during plan production or at the application stage. For the exception test to be passed it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the*



*vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall” (Paragraph 160).*

30. *“Both elements of the exception test should be satisfied for development to be allocated or permitted” (Paragraph 161).*
31. In respect of surface water drainage, paragraph 163 of the NPPF states that development should only be allowed in areas at risk of flooding if it incorporates sustainable drainage systems unless there is clear evidence that this would be inappropriate. Paragraph 165 that applications for major developments as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015, should incorporate sustainable drainage systems to appropriate operational standards and with maintenance arrangements in place unless there is clear evidence that this would be inappropriate.

#### DEFRA Technical Standards for Sustainable Drainage Systems, March 2015

32. DEFRA non-statutory technical standards state that surface water drainage systems should be designed so that:
  - Flooding does not occur on any part of the site for a 1:30 annual probability rainfall event, unless an area is designed to hold and/or convey water as part of the design;
  - Flooding does not occur in any part of a building during a 1:100 annual probability event; and
  - Flows resulting from rainfall in excess of a 1:100 annual probability rainfall event are managed in exceedance routes that minimise the risks to people and property, so far as is reasonably practicable.
  - For greenfield developments, the peak runoff rate from the development to any drain, sewer or surface water body for the 1:1 and 1:100 annual probability rainfall event should never exceed the peak greenfield runoff rate for the same event.
  - Where reasonably practicable, for greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1:100 annual probability, 6 hour rainfall event should never exceed the greenfield runoff volume for the same event.
  - Where it is not reasonably practicable to constrain the volume of runoff to any drain, sewer or surface water body, the runoff volume must be discharged at a rate that does not adversely affect flood risk.

#### Local Planning Policy and Guidance

33. South Staffordshire Council Core Strategy was adopted in December 2012. The following policies are relevant in respect of flood risk and drainage:
34. Core Policy 3: Sustainable Development and Climate Change states in part that the Council will require development to be designed to cater for the effects of climate change and help to minimise any environmental impacts by guiding development away from known areas of flood risk and ensuring the use of sustainable drainage in all new development.
35. Policy EQ7: Water Quality, Policy EQ11: Wider Design Considerations and Policy EQ12: Landscaping state in part that all planning applications must include a suitable sustainable drainage scheme.

## Consents

36. An Environmental Permit for Flood Risk Activities may be required from the Environment Agency for work: In, under, over or near a main river (including where the river is in a culvert); On or near a flood defence on a main river; In the flood plain of a main river.
37. Land drainage consent may be required from the Lead Local Flood Authority or Internal Drainage Board for work to an Ordinary Watercourse. Undertaking activities controlled by local byelaws (made under the Water Resources Act 1991) also requires the relevant consent.

## Site Development Potential and Opportunities

38. The site is assessed to be at risk of flooding from the River Penk, Pothooks Brook, surface water and groundwater, but with flood risk varying across the site.
39. According to planning policy, land located in Flood Zone 2 and Flood Zone 3 may be developed for a range of uses, as long as it can be demonstrated that the development will be safe from flood risk for the lifetime of the development, taking into account potential future effects of climate change and the vulnerability of the users, and that the development will not increase flood risk elsewhere.
40. Although parts of the site are indicated to be a risk of flooding, predominantly from fluvial and surface water sources,, it is assessed that flood risk would not preclude development of the site for a mix of uses, subject to the following considerations:
  - a) Implementation of a package of measures to mitigate flood risk as appropriate. The measures would be tailored to the nature of the flood risk and the proposed use(s), but could include the following:
    - Designing the site layout so that uses most vulnerable to flooding are located in the areas of lowest risk;
    - Raising ground levels;
    - Raising finished ground floor levels of buildings;
    - Using flood resistance measures to prevent the ingress of flood water into buildings;
    - Using flood resilience measures to reduce the impact of flooding should flooding occur;
    - Accommodate surface water flow paths through the design of the site;
    - Provision of an undeveloped buffer strip adjacent to the River Penk and Pothooks Brook. This could be part of a wider blue-green corridor that provides for habitat creation and enhanced biodiversity through the site;
    - Implementing a flood response plan to set out measures to be taken in the event that flooding is forecast if developing.
  - b) It is likely that a road may be required across Pothooks Brook and associated floodplain (as mapped). This is quite feasible as long as principal flood pathways are not blocked. This would require any new culverts and/or bridges to be designed with sufficient capacity to convey the 1 in 100 plus climate change AEP event so as not to increase flood risk. Detailed hydraulic modelling of the brook would be required to inform the design.
  - c) There may be an opportunity to realign Pothooks Brook so that it runs along and to the west of the WCML. This would reduce the risk of flooding associated with a blockage of the culverts that currently convey the watercourse under the railway line.



- d) Based on the available information, it is recommended that any new railway station on the WCML is situated within Flood Zone 1; the extent of Flood Zone 1 would be confirmed by detailed hydraulic modelling should the site progress to the planning application stage.
- e) Any proposal to modify ground levels in Flood Zone 3 should demonstrate that there will be no loss of flood flow or flood storage capacity for floods up to the severity of the of the 1 in 100 AEP event. Whilst not specified by the NPPF, the Environment Agency generally recommends that this should be the case over the lifetime of development (i.e. should take into account climate change).

### Surface Water Management

- 41. The site is currently undeveloped greenfield. Given site topography and ground conditions, surface water runoff would be expected to flow overland towards the River Penk and Pothooks Brook and slowly infiltrate where conditions allow.
- 42. The greenfield surface water runoff rates for the site, calculated using the ICP SUDS method within MicroDrainage are presented in **Table 2**.

**Table 2: Greenfield Runoff Rate**

Annual probability of rainfall event	Greenfield Runoff Rate (l/s/ha)
1 in 1	3.6
QBAR	4.4
1 in 30	8.6
1 in 100	11.3

- 43. The NPPG<sup>3</sup> requires surface water runoff from a developed site to be disposed of according to the following hierarchy: Into the ground (infiltration); To a surface water body; To a surface water sewer, highway drain, or another drainage system; To a combined sewer.
- 44. As previously detailed, the site is predominantly underlain by soils with impeded drainage. Areas underlain by sand and gravel are indicated to have the potential for shallow groundwater. As such, the disposal of surface water via infiltration is assessed not to be feasible, and it is likely that surface water runoff from the developed site would discharge to the River Penk and Pothooks Brook.
- 45. The proposed development has been split into four drainage areas based on site topography, as illustrated in **Figure 10**. For the purposes of this appraisal, it has been assumed that land to the east of the M6 will not be developed and that the development platform is all land located in Flood Zone 1. The post development percentage of impermeable surfaces for drainage areas 1 - 3 has been estimated to be 60% and drainage area 4 to be 80% as shown in **Table 3**.

<sup>3</sup> Paragraph 080, Reference ID: 7-080-20150323

**Table 3: Indicative Post Development Impermeable Areas**

Drainage Area	Development Platform (ha)	Impermeable Area (ha)
1	36.1	21.7
2	27.3	16.4
3	39.0	23.4
4	19.0	15.2

46. To ensure that surface water is managed in accordance with the relevant technical guidance and that flood risk is not increased elsewhere, the rate at which surface water runoff discharges from impermeable surfaces at the proposed development site would be restricted to greenfield rates.
47. It is likely that surface water runoff from the developed site would be restricted to the existing greenfield QBAR rate of 4.4 l/s/ha, as outlined in **Table 2**. The peak runoff rate per drainage area is provided in **Table 4**.
48. This could be achieved by the provision of SuDS surface water attenuation storage facilities (to ensure that there is no flooding during the 1 in 100 plus 40% climate change event) and outlet control devices (to restrict the outflow from the storage facility to existing greenfield rates).
49. For the purposes of this appraisal, it has been assumed that surface water storage would be provided within attenuation basins within each drainage area. The approximate required storage volumes and indicative areas for storing surface water (land take per drainage area and per hectare) are provided in **Table 4**.
50. Detention basins for each drainage area have been sized to fill to approximately 1.0 m depth, with a 0.3 m freeboard and a 1 in 3 side slope.
51. The estimated volumes provided in **Table 4** do not take into account any storage that would be provided within the on-site surface water conveyance system serving the development. When this is taken into account the size of the attenuation facilities is likely to reduce significantly.
52. The attenuation storage facilities are likely to be provided in a number of different storage facilities. The potential for alternative and/or additional SuDS features (for example, permeable paving, geo-cellular storage crates, filter drains, filter strips and swales) would be investigated should the site progress to the planning application stage.

**Table 4: Indicative Peak Runoff Rates, Storage Volumes and Land Take**

Annual probability of rainfall event	Drainage Area (DA)			
	1 21.7 ha	2 16.4 ha	3 23.4 ha	4 15.2 ha
<b>Discharge Rate (l/s)</b>				
QBAR	95.5	72.2	103.0	66.9
<b>Indicative Storage Volume (m<sup>3</sup>)</b>				



Volume/DA: 1 in 100 + 40% CC	11,700	8,920	12,510	8,285
<b>Indicative Storage Area (m<sup>2</sup>)</b>				
Land take per drainage area	16,850	12,820	18,220	11,965
Land take per hectare	800	853	760	798

53. Flows resulting from rainfall in excess of the 1 in 100 plus CC event would be managed in exceedance routes with flows directed towards carriageways and away from built development.
54. Attenuation basins can provide water quality benefits via the settlement of pollutants in still or slow moving water, adsorption by the soil, and biological activity. The potential for additional SuDS features to be utilised at the site would be investigated should the site progress to the planning application stage.

### Summary and Conclusions

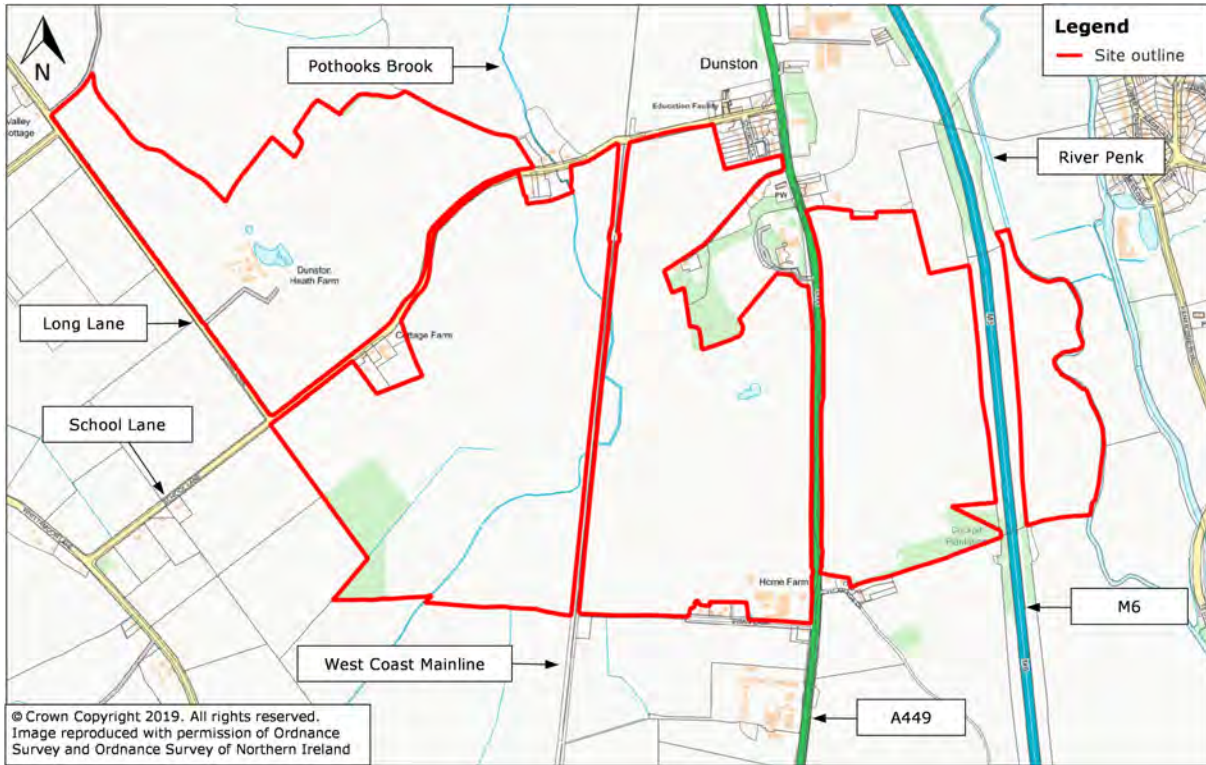
55. This preliminary appraisal of flood risk and drainage has been prepared on behalf of Rigby Estates LLP and relates to the proposed development of land known as "Dunston Garden Village" at Dunston, Staffordshire for residential led mixed use development.
56. According to the Flood Map for Planning the proposed development site is located within Flood Zones 1, 2 and 3 – low to high risk of river flooding. The source of flooding is indicated to be from the River Penk and Pothooks Brook.
57. The Environment Agency has not undertaken any detailed modelling of Pothooks Brook and the Flood Map for Planning is based on national generalised modelling. To more accurately assess the risk of flooding from Pothooks Brook, detailed hydraulic modelling would need to be undertaken to determine flood extents and depths from Pothooks Brook should the site progress to the planning application stage.
58. The site is also assessed to be at risk of flooding from surface water within low lying areas of the site, and from groundwater within the eastern portion of the site.
59. It is assessed that the site could be developed for a range of uses subject to the implementation of mitigation measures appropriate to the risk of flooding and the vulnerability of the proposed use to flood risk.
60. The construction of a new road(s) across the site, Pothooks Brook and associated floodplain is feasible as long as principal flood pathways are maintained and flood risk is not increased. This would require any new culverts and/or bridges to be designed with sufficient capacity to convey the 1 in 100 plus climate change AEP event so as not to increase flood risk.
61. There may be an opportunity to realign Pothooks Brook so that it runs along and to the west of the WCML. This would reduce the risk of flooding associated with a blockage of the culverts that currently convey the watercourse under the railway line and would be expected to result in the removal of land to the east of the WCML from Flood Zone 3.
62. Based on the available information, it is recommended that any new railway station on the WCML is situated within Flood Zone 1. However, it is likely to be feasible to site a new station more centrally within the site on land currently indicated to be located in

Flood Zone 3, subject to the implementation of appropriate flood risk mitigation measures, and as long as flood risk is not increased elsewhere.

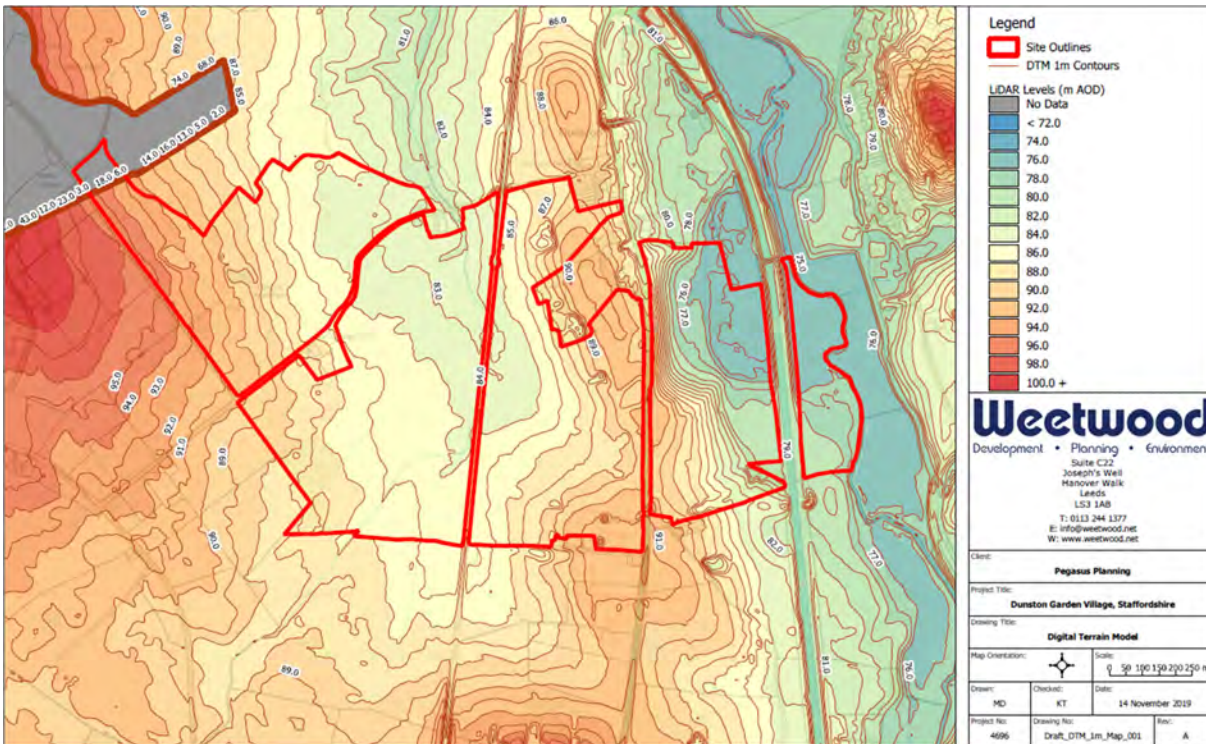
63. Regarding surface water, the appraisal indicates that runoff from the developed site could be disposed of to Pothooks Brook and the River Penk, thereby replicating the existing natural drainage at the site.
64. Surface water runoff generated on new impermeable surfaces would be restricted to greenfield rates, with significant betterment (reduction in downstream flood risk) provided during more extreme storm events. This would be achieved through the provision of attenuation storage and outlet control devices.
65. Whilst it is reasonable to expect that surface water attenuation storage could be distributed across the site, it is evident that the site lends itself to the creation of a cascade of attenuation features such as detention basins, retention ponds, wetlands and swales, along the central spine of the site (Pothooks Brook). Such an approach could form an integral part of a blue-green corridor through the site, providing new habitat and enhanced biodiversity in conjunction with open space.
66. In conclusion it is assessed that the site could be developed for a range of uses in accordance with planning policy and relevant technical guidance, subject to the implementation of mitigation measures appropriate to the risk of flooding and the vulnerability of the proposed use to flood risk, and that surface water runoff could be managed using sustainable drainage systems.



## FIGURES

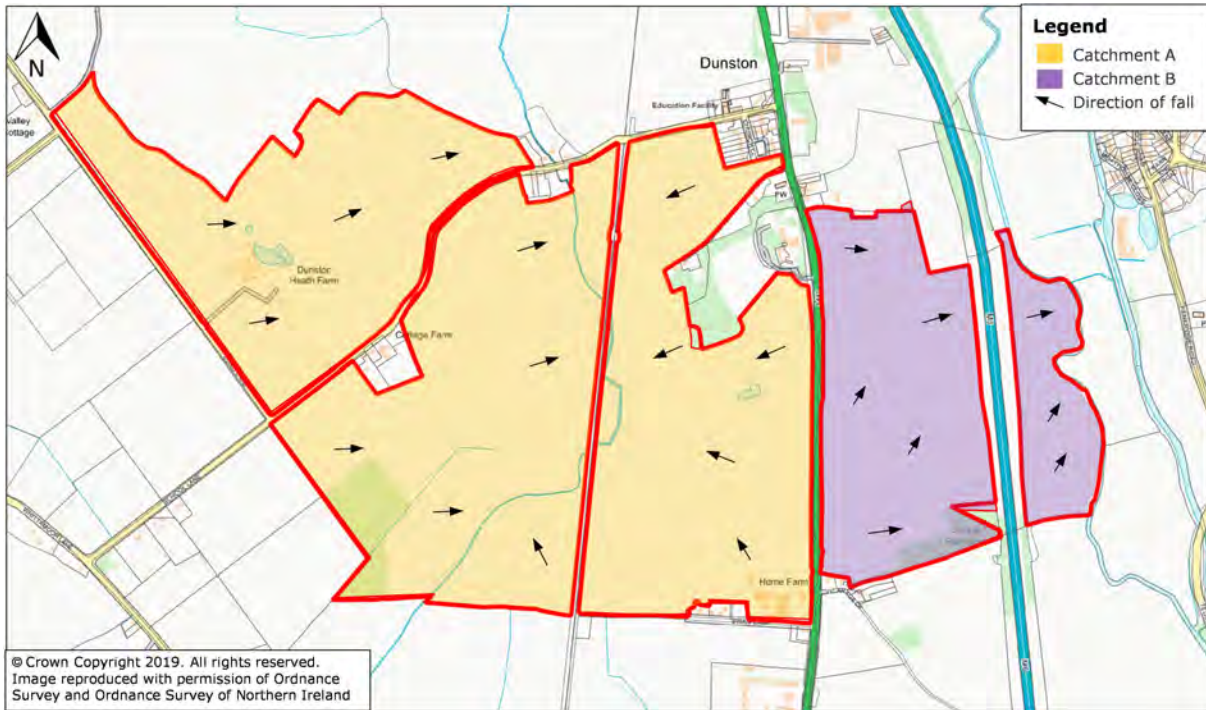


**Figure 1: Site Location**

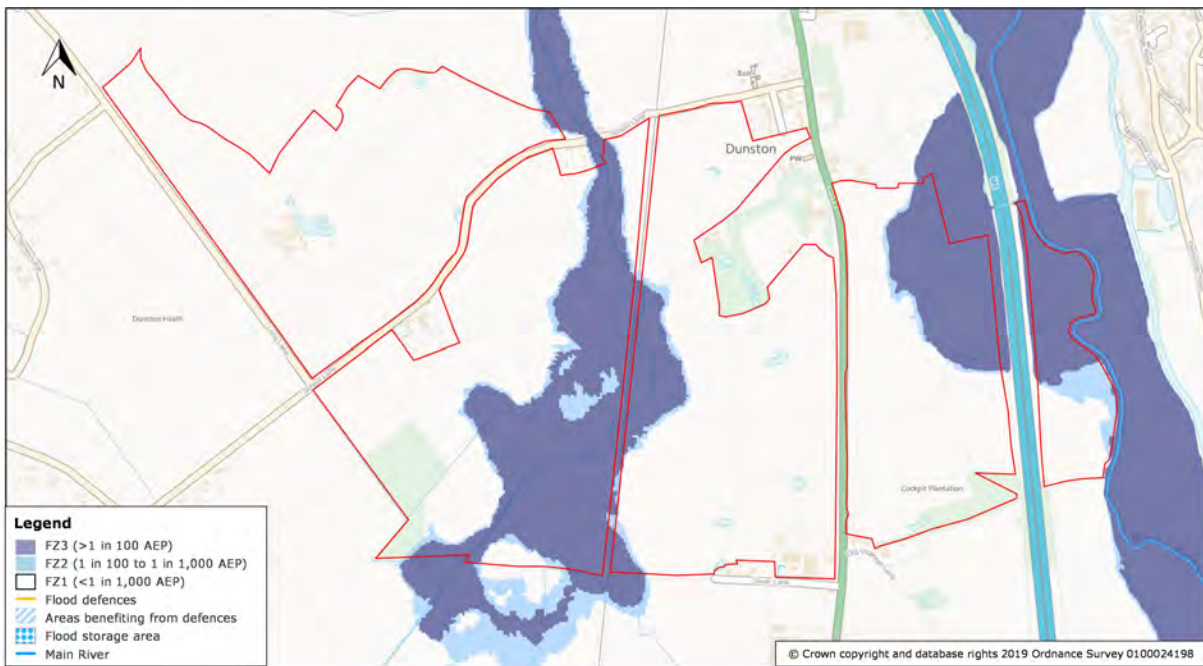


**Figure 2: Digital Terrain Map**

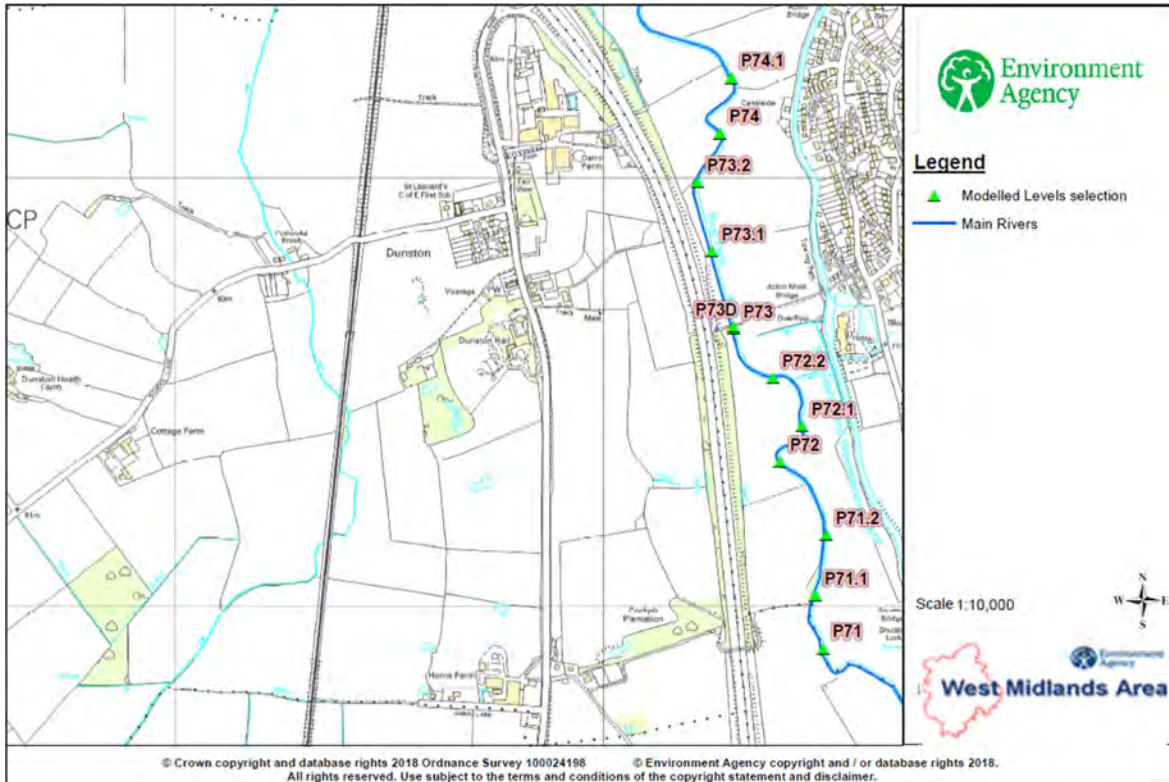




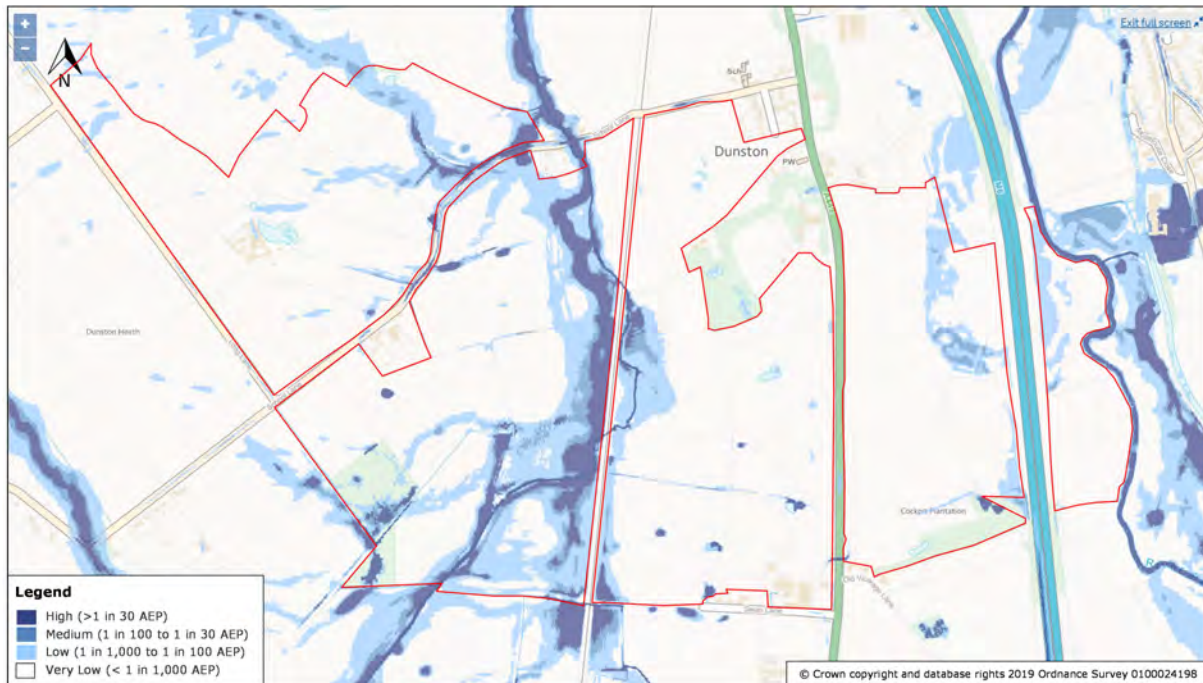
**Figure 3: Catchment Areas**



**Figure 4: Flood Map for Planning**  
 (Source: <https://flood-map-for-planning.service.gov.uk> website)



**Figure 5: River Penk Modelled Node Locations**  
 (Source: Sow and Penk Visualisation Model, 2011)



**Figure 6: Risk of Flooding from Surface Water**  
 (Source: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map> website)





**Figure 7a: Risk of Flooding from Surface Water – Depth – High Risk**



**Figure7b: Risk of Flooding from Surface Water – Depth – Medium Risk**

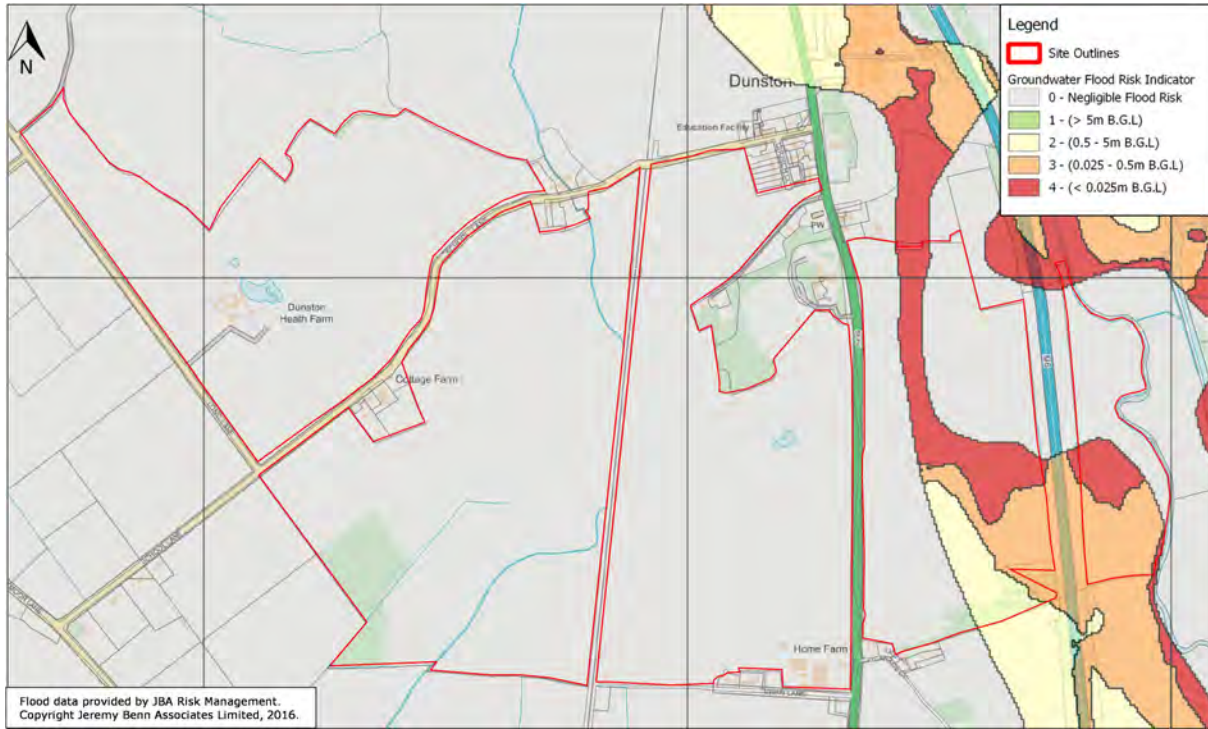


**Figure 7c: Risk of Flooding from Surface Water – Depth – Low Risk**  
(Source: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map> website)

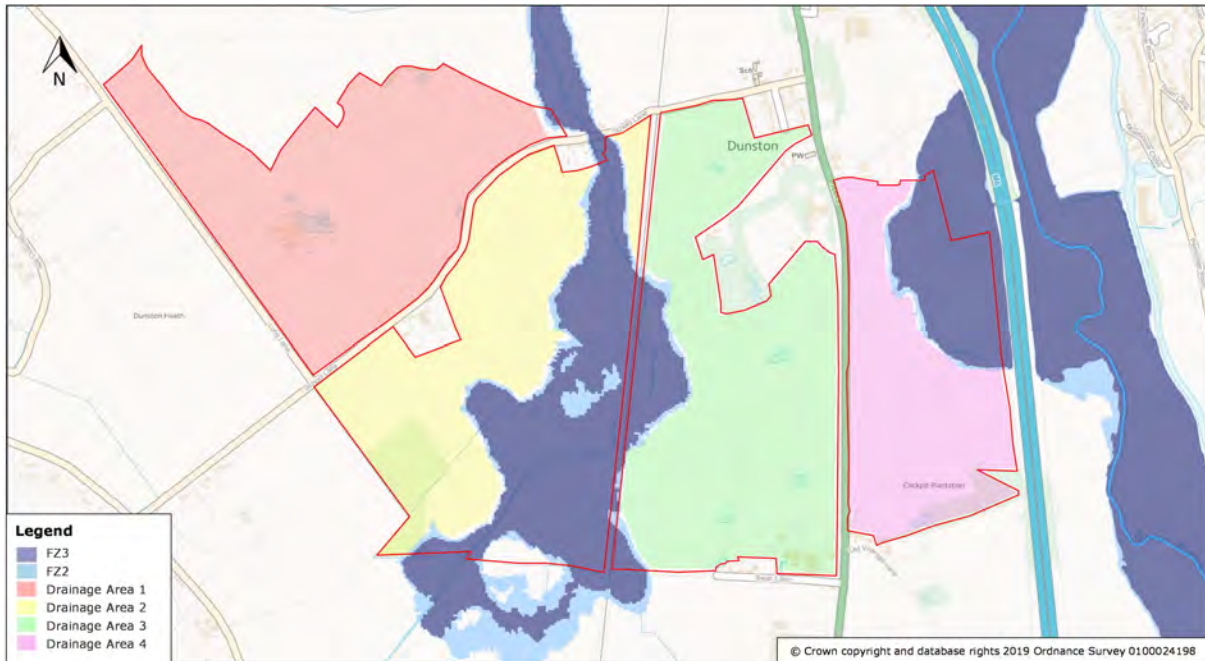


**Figure 8: Flood Risk from Reservoirs**  
(Source: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map> website)





**Figure 9: Risk of Flooding from Groundwater**  
 (Source: BLUESKYPMAPSHOP.COM website)



**Figure 10: Drainage Catchment Areas**

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Flood Risk Assessments  
Flood Consequences Assessments  
Surface Water Drainage  
Foul Water Drainage  
Environmental Impact Assessments  
River Realignment and Restoration  
Water Framework Directive Assessments  
Environmental Permit and Land Drainage Consent Applications  
Sequential, Justification and Exception Tests  
Utility Assessments  
Expert Witness and Planning Appeals  
Discharge of Planning Conditions





## Appendix 5 – Ecology Report – TEP



THE  
ENVIRONMENT  
PARTNERSHIP

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**DUNSTON VILLAGE  
STAFFORDSHIRE  
ECOLOGICAL CONSTRAINTS REPORT**





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## **APPENDICES**

- APPENDIX A: Desk Study Report 7960.001
- APPENDIX B: Target Notes Report 7960.003

## **DRAWINGS**

- G7960.002 - Phase 1 Habitat Survey
- G7960.003 - Ecological Constraints Plan



## 1.0 Overview

### Introduction

- 1.1 TEP was commissioned, in November 2019 by Rigby Estates LLP, to provide an ecological representation of land at Dunston, Stafford (approximately 162ha) outlining potential ecological constraints and opportunities in relation to developing the site.
- 1.2 The site is currently designated as Open Countryside, Open Space: Amenity, and Retained BAS (Biodiversity Alert Site). The whole site is also shown on the South Staffordshire Local Plan as a Strategic Housing and Economic Land Availability Assessment (SHELAA) site. Rigby Estates LLP are proposing the Dunston land parcel for mixed use development which will include residential properties.
- 1.3 A Phase 1 Habitat Survey was undertaken by Principal Ecologist Lynsey Crellin (FISC Level 5<sup>1</sup>) and Annabel Walker-Evans (FISC Level 3) on 26th and 27th November 2019. The Phase 1 Habitat Map is included within the drawing section of this report as Drawing 1 (drawing reference: G7960.006) and accompanying Target Notes are included in Appendix A.
- 1.4 Areas of high, medium and low ecological constraints have been defined within Section 2.0 and are shown on Drawing G7960.007

### Limitations

- 1.5 The survey was undertaken in November, outside the optimum period for habitat surveys (April to early October). Trees are no longer in leaf and there is little evidence of woodland ground flora or grassland flora due to the time of year. The site is predominantly intensively managed agricultural land and improved pasture - within these areas, seasonal constraints are not considered to impact the assessment of the site for this high level ecological representations report. Further botanical survey is recommended for any areas which may support a more diverse botanical assemblage. Further species surveys are discussed in section 2.0.

### Desktop and Background Study

#### Relevant Planning Policies and Guidance

- 1.6 The site is allocated within the current South Staffordshire Core Strategy Development Plan (adopted 11th December 2012) as Open Countryside, Open Space: Amenity, and Retained BAS, but the whole site is also identified in the SHELAA. Core Policy 1 & 2, as well as Policy OC1, EQ1-4 and Policy HWB2 from the South Staffordshire Core Strategy Development Plan and Site Allocations Document (SAD, adopted September 2018) are most relevant to the protection of natural assets:
  - Core Policy 1 - The Spatial Strategy for South Staffordshire

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<sup>1</sup> Field Identification Skills Certificate Level 3: widely accepted as the industry standard level for Phase 1 Habitat Survey.

- Core Policy 2 - Protecting and Enhancing the Natural and Historic Environment
- Policy OC1 - Development in the Open Countryside Beyond the West Midlands Green Belt
- Policy EQ1 - Protecting, Enhancing and Expanding Natural Assets
- Policy EQ2 - Cannock Chase Special Area of Conservation
- Policy EQ3 - Conservation, Preservation and Protection of Heritage Assets
- Policy EQ4 - Protecting and Enhancing the Character and Appearance of the Landscape
- Policy HWB2 - Green Infrastructure

### Designated Sites

- 1.7 Indirect impacts on designated sites such as an increase in the quantity of visitors can be avoided through the provision of public open space within the Dunston site. This would reduce pressure on nearby designated sites.
- 1.8 Three internationally designated sites are present within 10km of the site:
- Cannock Chase Special Area of Conservation (SAC), located 3.59km east and designated for the presence of Annex 1 habitat European dry heath and wet heath;
  - Motty Meadows SAC, 7.95km south west, designated for supporting Annex 1 habitat lowland hay meadows; and
  - Pasturefields Salt Marsh SAC, 9.17km north west and designated for supporting the only UK example of Annex 1 habitat inland salt meadows.
- 1.9 There are two nationally designated wildlife sites within 5km of the site:
- Cannock Chase Area of Outstanding Natural Beauty (AONB), 3.27km east and designated for floristically diverse wet heath and woodland of local and national importance.
  - Cannock Chase Site of Special Scientific Interest (SSSI), 3.59km east, designated for importance to invertebrate populations as well as supporting habitats for bat species, adder, common lizard and nightjar.
- 1.10 There are no nationally or internationally designated wildlife sites within 1km of the site. The site is located within a Natural England (NE) Impact Risk Zone (IRZ) for Cannock Chase SSSI. The IRZ provide Local Planning Authorities with a framework, setting out certain types of development which have the potential to negatively impact on the SSSI, and for which consultation with Natural England may be required. The categories of development included within the Cannock Chase IRZ includes:
- Airports, helipads, and other aviation proposals
  - Any residential developments with a total net gain in residential units
  - Any residential developments outside of existing settlements/urban areas with a total net gain in residential units.
  - Any industrial/agricultural development that could cause air pollution (incl: industrial processes, livestock & poultry units with floorspace >500m<sup>2</sup>, slurry lagoons >750m<sup>2</sup> & manure stores > 3500t).



- General combustion processes >50MW energy input (incl.: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/ combustion).
  - Any discharge of water or liquid waste of more than 20m<sup>3</sup>/day to ground (i.e. to seep away) or to surface water, such as a beck or stream (NB This does not include discharges to mains sewer which are unlikely to pose a risk at this location).
- 1.11 The presence of Cannock Chase SAC and SSSI in the surrounding landscape may present a constraint to development at the Dunston site. The proposed development is likely to be of mixed use, including residential, which is likely to trigger the SSSI IRZ criteria. Further assessment of developmental impacts to these sites would be advisable as more detail emerges on any development proposals including any associated infrastructure.
- 1.12 An Assessment of Likely Significant Effects (ALSE) is likely to be required to determine potential effects of the development on the SAC. Consultation with Natural England will be required.
- 1.13 One locally designated site lies within the Dunston site boundaries - Cockpit Plantation retained Biodiversity Alert Site (BAS) located in the south east of site, adjacent to the west of the M6.
- 1.14 There are four locally designated sites within 2km of the proposed site boundaries:
- The Moathouse, Acton Trussel and Staffordshire and Worcestershire Canal, 0.18km east, consisting of the canal and adjacent fish ponds which are surrounded by broad-leaved woodland.
  - The Whittamoors retained BAS, 0.80km south west, designated for presence of broad-leaved woodland habitat;
  - Little Heath (land north of), retained BAS, 0.82km west, supporting pools, scattered tree and grassland habitats;
  - Teddesley Park Local Wildlife Site (LWS), 1.82km south east supports varied habitat of eutrophic pools, wood pasture and plantation woodland. 32 veteran trees are present within the site.
- 1.15 With the exception of Cockpit Plantation in the south east of site, development at Dunston is unlikely to directly impact on the above locally designated sites, due to distance or in the case of The Moathouse, Acton Trussel and Staffordshire and Worcestershire Canal, due to physical separation by the M6 and the River Penk.

#### Protected Species Records

- 1.16 Records of protected species within 2km of the site were identified by the desk based study (Appendix A), including:

##### *Mammals:*

- Badger *Meles meles*;
- Bat species *Chiroptera sp.*;
- Otter *Lutra lutra*; and

- Water vole *Arvicola amphibius*

*Amphibians:*

- Great crested newt *Triturus cristatus*; and
- Common toad *Rana bufo*.

*Birds:*

- Barnacle goose *Lepas anatifera* (BAm)
- Barn owl *Tyto alba* (WCA1)
- Black-headed gull *Chroicocephalus ridibundus* (BAm)
- Black redstart *Phoenicurus ochruros* (BRd)
- Bullfinch *Pyrrhula pyrrhula* (S41, BAm);
- Common sandpiper *Actitis hypoleucos* (BAm)
- Cuckoo *Cuculus canorus* (BRd, S41)
- Curlew *Numenius arquata* (S41, BRd);
- Corn bunting *Emberiza calandra* (BRd, S41)
- Dunnock *Prunella modularis* (BAm);
- Fieldfare *Turdus pilaris* (WCA1)
- Gadwall *Anas strepera* (BAm)
- Great black-backed gull *Larus marinus* (BAm)
- Greenshank *Tringa nebularia* (WCA1, BAm)
- Green sandpiper *Tringa ochropus* (WCA1, BAm)
- Greylag goose *Anser anser* (BAm)
- Grey partridge *Perdix perdix* (S41, BRd);
- Grey wagtail *Motacilla cinerea* (BRd);
- Hobby *Falco subbuteo* (WCA1)
- House martin *Delichon urbicum* (BAm);
- Kestrel *Falco tinnunculus* (BAm);
- Kingfisher *Alcedo atthis* (WCA1, BAm)
- Lapwing *Vanellus vanellus* (S41, BRd);
- Lesser black-backed gull *Larus fuscus* (BAm)
- Lesser spotted woodpecker *Dendrocopos minor* (BRd, S41)
- Linnet *Linaria cannabina* (S41, BRd);
- Mallard *Anas platyrhynchos* (BAm)
- Meadow pipit *Anthus pratensis* (BAm)
- Merlin *Falco columbarius* (WCA1, BRd)
- Mistle thrush *Turdus viscivorus* (BRd);
- Meadow Pipit *Anthus pratensis* (BAm);
- Mute swan *Cygnus olor* (BAm)
- Osprey *Pandion haliaetus* (WCA1, BAm)
- Peregrine *Falco peregrinus* (WCA1)
- Red kite *Milvus milvus* (WCA1)
- Redwing *Turdus iliacus* (WCA1, BRd)
- Shelduck *Tadorna tadorna* (BAm)
- Shoveler *Anas clypeata* (BAm)



- Song thrush *Turdus philomelos* (BRd, S41)
- Starling *Sturnus vulgaris* (S41, BRd);
- Stock dove *Columba oenas* (BAm)
- Swift *Apus apus* (BAm);
- Tawny owl (BAm)
- Teal (BAm)
- Tree sparrow (BRd)
- Whinchat (BRd)
- Whooper swan (WCA1, BAm,
- Wigeon (BAm)
- Willow warbler *Phylloscopus trochilus* (BAm);
- Woodcock (BRd)
- Yellowhammer (BRd, S41)
- Yellow wagtail (BRd, S41)

## Site Description

- 1.17 The Dunston Site is approximately 162ha in size and is immediately surrounded by agricultural land within small pockets of residential areas on all aspects. The site is surrounded by agricultural land on all sides with the River Penk flowing south to north along the eastern boundary. The M6 runs vertically through the east of site, separating the easternmost parcel of land from the rest of site.
- 1.18 In the wider area, Stafford City centre lies 5km north and Cannock Chase Area of Outstanding Natural Beauty (AONB) lies 3.27km east. The central grid reference for the site is SJ 92399 17011 and a site location plan is shown in Figure 1.
- 1.19 The site is predominantly arable and improved pasture fields with species-rich hedgerow boundaries and occasional wet ditches to help drain the land. The largest area of woodland on the site is a block of mixed plantation woodland in the south-western corner of the site. Semi-natural broadleaved woodland is present in small pockets throughout the site, with one larger pocket of broadleaved plantation woodland in the south-eastern corner of the site. Ponds and ephemeral pools are present across all parcels, except the land east of the M6.
- 1.20 No invasive non-native plant species (notified under Schedule 9 of the Wildlife and Countryside Act 1981) were identified within the site during the habitat survey, however the survey was completed outside of the optimal survey window for flora, therefore a survey in the appropriate season would be required to determine whether invasive species are present on or adjacent to the site.
- 1.21 Due to the size of the site, it has been divided up into five smaller parcels for the purpose of this report, with these shown on Drawing 1: G7960.006.
- West
  - Central West
  - Central
  - Central East
  - East

### West Parcel

- 1.22 The western-most parcel measures approximately 36ha in total and is bounded to the south east by School Lane and to the south west by Long Lane. Further agricultural land is present to the north of the land parcel.
- 1.23 The majority of field boundaries are comprised of species rich hedgerows and trees. Shallow ditches carrying water are also present adjacent to the majority of hedgerows, acting as drainage for the farmland.
- 1.24 The western parcel is made up of 15 fields, separated by hedgerows or wooden fencing. 11 of the fields are semi-improved grassland fields that appear to have been grazed in the past but did not contain livestock at the time of the site visit. The grassland within these fields has grown to >50cm in places. Three of the remaining fields are used for crop planting. Crucifer crop species were grown in the north western fields of Long Lane and the southern field at the junction of School Lane and Long Lane during the site visit.
- 1.25 The final field consists of amenity grassland (TN23) adjacent to the east of the farm yard within the centre of the parcel. This amenity area is rented out as a caravan and campsite. Fishing ponds (TN18) are also present within the amenity area and available to use for the campers. The grassland is managed regularly and kept to a short sward of <5cm.
- 1.26 Species rich native hedgerows (TN13) are present throughout the western parcel. Dominating species included hazel *Corylus avellana*, hawthorn *Crataegus monogyna* and blackthorn *Prunus spinosa*. Oak *Quercus robur*, holly *Ilex aquifolium*, ash *Fraxinus excelsior*, dog rose *Rosa canina* and honeysuckle *Lonicera periclymenum* were also present. Ground flora of the hedgerows was consistent throughout the area and comprised cleavers *Galium aparine*, white dead-nettle *Lamium album*, Yorkshire fog *Holcus lanatus*, bramble *Rubus fruticosus* and chickweed *Stellaria media* - a full species list is provided within Appendix B.
- 1.27 Adjacent to the majority of the hedgerows within the western parcel was a ditch designed to drain water from the fields. The majority of the ditches were dry at the time of survey however a small amount of standing water was present within the ditch adjacent to Long Lane and within a small stretch adjacent to School Lane. A small watercourse flows west to east along much of the northern boundary and at TN22. Due to the diversity of the hedgerows and their associated features (ditches, parallel hedge etc.) it is likely that a number of these hedges would be found to qualify as 'Important' under the Hedgerow Regulations (1997) if a full assessment was carried out.
- 1.28 Numerous mature trees were present within the bordering hedgerows of the western parcel fields. The dominating tree species within the western parcel was English oak, many of which contained dead wood, tears, woodpecker holes and cracks.



- 1.29 Four ponds are present within the western land parcel. This includes the two fishing ponds (TN18) within the amenity grassland field. The fishing ponds are surrounded by small number of young birch saplings. There is also a small triangular pond just to the north of the fishing lake which is surrounded by tall ruderal herb and bramble scrub (TN17). The two other ponds are within small woodland blocks at TN20 and TN21 and are heavily shaded.
- 1.30 A farm yard and associated buildings are present within the south east this land parcel. The area contains open storage buildings and cow shelters which are exposed to the elements, as well as brick farm houses which may contain features with potential to support roosting bats.

#### Central West Parcel

- 1.31 The central west parcel measures approximately 48ha in total, bounded by School Lane to the north and west, a train line to the east and further agricultural land to the south. The whole of the central west parcel consists of arable fields, with the exception of the south western area where mixed woodland is present, covering 3.1ha.
- 1.32 The area is intensively farmed, with crops present in each field. The majority of fields were planted with carrot as well as other crucifer crops species however, some field were recently ploughed and consisted of bare ground, awaiting planting. Field boundaries consisted of both species poor and species rich native hedgerows (both intact and defunct). Ditches were also present adjacent to the majority of hedgerows to offer drainage for the arable fields.
- 1.33 Hedgerows predominantly comprised hawthorn and blackthorn. These two species dominate the species-poor hedgerows within this land parcel and persist within the species rich hedges. Hazel, dog rose, willow sp. *Salix sp.*, and holly were also present within the species rich hedgerows, with bramble and ivy also abundant. Hedgerows grew from within 0.5m deep, dry drainage ditches and also adjacent to wet drainage ditches between 0<0.5m deep, bordering the arable fields.
- 1.34 Young, semi-mature and mature trees are present within the hedgerow boundaries of this land parcel. Many of the more mature specimens contain a range of woodpecker holes, rot and knot holes as well as torn out branches all contribute towards crevice spaces and open wounds which can provide potential roosting features for both bats and birds. Mature species are predominantly oak and ash.
- 1.35 A large ephemeral pool (TN27) approximately 0.18ha was present at the time of survey within the northern-most arable field. Both grass species and crops were present beneath the ephemeral pool, where it had formed adjacent to the northern hedgerow, south of School Lane. It appears that the pool dries annually and is present seasonally or in times of heavy rainfall. Fish were absent from the pool.

- 1.36 A small pond (TN39) has formed within a depression of land, located at the centre of the western boundary of this parcel, beneath a hedgerow and ditch holding running water. Water enters the pond from the north and proceeds southwards following the drainage ditches. The hedgerow and scrub forming the border of the fields completely envelops the pond, shading 100% of the water's surface. No aquatic vegetation, fish or water fowl were present at the time of survey.
- 1.37 Mixed woodland is present within the south west of the parcel. The dominant species are sycamore and oak, with holly abundant in the understorey. Bramble, cleavers, willowherb *Epilobium sp.* and herb robert *Geranium robertianum* are all frequent ground flora species. Towards the north of the woodland, the dominant species alters from broad-leaved species to coniferous species including pines *Pinus sp.* and larches *Larix sp.* Signs of digging which could indicate badger presence was identified within the south east of the woodland however, no further evidence of badger, such as setts, latrines, commuting routes or tracks were discovered within the area.

#### Central Parcel

- 1.38 The central parcel measures approximately 43ha in total and is located between a train line running north to south, forming the western border and the A449 to the east.
- 1.39 The area is intensively farmed with the majority of the fields containing improved grassland or arable habitats, used for sheep grazing and crop planting respectively. No crops were present at the time of survey, the arable fields were ploughed and consisted of bare ground, prepared for planting.
- 1.40 Field boundaries consist of hedgerows, the majority of which are species-poor, and wooden fencing with gates installed for moving and containing animals. Grass is grazed to a short sward of <5cm and species present do not have much diversity, comprising perennial rye-grass *Lolium perenne*, dandelion *Taraxacum sp.*, clover sp. *Trifolium sp.*, and occasional Yorkshire fog *Holcus lanatus*.
- 1.41 A wet ditch running north to south along the western boundary (TN32) forms a small stream within this land parcel that meanders through the central improved pasture. The stream runs east into the central pasture before heading west again to join the western border, isolating a small area of pasture which was inaccessible to grazing sheep. The grassland within this isolated area remained a short sward, implying the stream will dry at other times and allow access to the isolated parcel. Grass and nettle vegetation was flattened by the running water at the base of the stream, further suggesting that the stream is not present year round.
- 1.42 Two semi-improved grassland fields are present within this central land parcel. One within the south east and one within the north east, both adjacent to the A449. Both parcels appear relatively unmanaged, allowing the sward to grow to approximately 20cm in places. Grazing animals were absent from both areas. The species diversity increased within these areas due to the lack of grazing and management, species such as yarrow *Achillea millefolium*, creeping buttercup *Ranunculus repens*, spear thistle *Cirsium vulgare* and false oat-grass *Arrhenatherum elatius* were present.



- 1.43 Seven ponds are located within this central parcel. The first of which lies within the northern-most pasture field, surrounded by semi-mature and mature oak trees. There are currently two separate ponds within this area (TN28). Nettle and grass species were submerged within the water's edge indicative of the flooded condition of the pond. With heavy rain, the two ponds will join into one large pond measure approximately 1000m<sup>2</sup> within the centre of the oak trees. The oaks surrounding the pond contain frequent potential roosting features for bat species.
- 1.44 Within the most eastern, improved grazing field, adjacent to the A449, are two ponds. The first lies within the centre of the field (TN30) and the second adjacent the south of the species-rich hedgerow stretching east to west across the centre of the field (TN31). TN30 measures approximately 920m<sup>2</sup> and is surrounded by willow scrub, bramble and occasional, semi-mature oak trees. Aquatic vegetation was present including common reed *Phragmites australis*. Invertebrates and possibly fish were also present. The pond at TN31 adjacent to the hedgerow, measures 560m<sup>2</sup> and is 95% shaded by encroaching scrub including bramble, hawthorn and birch saplings. Rush species *Juncus sp.*, nettle, common reed and broad-leaved dock *Rumex obtusifolius* are also present.
- 1.45 A further pond is present within the semi-improved grassland in the south east, north of Swan Lane (TN33). The pond measure 660m<sup>2</sup> and is located adjacent to the south aspect of the northern field boundary. This pond is also encroached by scrub species, as listed above. The scrub covers approximately 70% of the water's surface and water level was relatively low at the time of survey.
- 1.46 Within the south western arable field, west of the farm on Swan Lane, an additional two ponds are located (TN35 & TN38). Both ponds lie along the eastern boundary of the field and are surrounded on all aspects by dense scrub. The scrub shades 100% of the water's surface and no aquatic vegetation was present in either pond at the time of survey. Pond TN38 and TN35 measure approximately 414m<sup>2</sup> and 382m<sup>2</sup> respectively.
- 1.47 This south western arable field also contains a small area used for waste storage. Rubble piles and earth spoil mounds have been created within this area. Bramble scrub and nettle dominates the area, growing over the spoil.
- 1.48 A farm yard is present within the south east of the central parcel, this area contains open storage buildings and cow shelters which are exposed to the elements, as well as brick farm houses which may support features with potential to support roosting bats. Hardstanding is present surrounding the buildings, used for storage, vehicle access and contains a cow feeding station.

#### Central East Parcel

- 1.49 The central east parcel is dominated by a grazed field which slopes steeply down from the A449 and flattens out into a marshy grassland area adjacent to the M6. The marshy grassland is dominated by tufted hair-grass *Deschampsia caespitosa* and soft rush *Juncus effusus* and would require survey at an appropriate time of year to confirm habitat quality and diversity. A broad ditch and a large area of standing water (TN10) are present in this area. The pond could not be accessed for further assessment due to the waterlogged nature of the surrounding ground.

- 1.50 In the centre of the parcel are two small copses, the easternmost one comprises a small pond in a dip surrounded by young self-seeded wych elm *Ulmus glabra* (TN11). The westernmost copse (TN9) is a collection of mature common lime *Tilia x europaea* and sycamore trees, some with the potential for roosting bats.
- 1.51 The two fields in the south of this parcel are currently planted with crops and are bisected by a species-poor hedgerow (TN12). An area of semi-mature broadleaved plantation woodland (TN1) is present along the southern boundary of this parcel. This habitat has the potential to support badger sett building but no signs of this species were found. Some of the more densely ivy-clad trees have the potential for roosting bats. There is a small shaded pond (TN2) with common duckweed and greater reedmace *Typha latifolia* within the woodland. This woodland is locally designated as Cockpit Plantation retained BAS. There is a large area of dense bracken at the edge of this plantation.

#### East Parcel

- 1.52 The easternmost parcel comprises two fields bordered by the River Penk to the east and separated by a fence. The field south of the fence is planted with crops. There is a small area of dense scrub in the south-western corner and scattered scrub in the south eastern corner, adjacent to the River Penk. There is a small copse of mature trees on the eastern boundary (TN4), including sycamore, turkey oak *Quercus cerris* and crack willow *Salix fragilis*.
- 1.53 The field north of the fence (TN5) comprises semi-improved pasture which was waterlogged in places. It appeared comparatively species-poor and was dominated by perennial ryegrass, but would require a survey in the appropriate season, particularly as the grassland on the opposite side of the river is mapped as priority habitat 'coastal and floodplain grazing marsh'.
- 1.54 The River Penk itself (TN3) was in spate at the time of survey and was slow-flowing and turbid. The earth banks have suitability for otter and water vole.



## 2.0 Areas of Constraint

- 2.1 For the purposes of this report, we have discussed the current habitats on site in relation to low, medium and high constraints. Protected and priority fauna are discussed separately because, at this stage, there is limited information on their presence or absence and therefore further survey will be required.
- 2.2 No ecological features were noted which would preclude some form of sensitive development at the site. Further surveys would clarify the area and density of development which could be undertaken, and the level of mitigation which would be required.

### Definitions

#### High Constraints 1

- 2.3 Habitats defined as a potential high constraint 1 to development include habitats that should be retained within the masterplan, contain protected or designated habitat or form important part of wildlife corridor. These areas should be protected from development. These include:
- Semi-natural broadleaved woodland
  - Mixed plantation woodland
  - Broad-leaved plantation woodland
  - Species rich hedgerows & hedgerows likely to be important under the Hedgerow Regulations (1997)
  - Ponds which are of good quality and likely to be difficult to replace
  - Rivers and river banks

#### High Constraints 2

- 2.4 Habitats defined as being difficult and/or costly to mitigate for loss. Contains high quality priority habitat which has the potential to contain protected species. May be 'Important' hedgerow.
- Species-poor hedgerows
  - Ponds which may support protected species

#### Medium Constraint

- 2.5 Habitats identified as a potential medium constraint to development include those where retention should be considered however, good design may override the need for retention. These habitats are also areas with potential for ecological enhancement or translocation. These include:
- Marshy grassland
  - Semi-improved grassland
  - Ephemeral pool

### Low Constraint

- 2.6 Habitats identified as a low constraint to development are those with poor ecological value that can be readily recreated and, as such, are the areas where development should be focussed to reduce the impact of development works across the site. These habitats represent most of the agricultural land across the site as a whole and include:
- Improved grassland
  - Arable
  - Amenity grassland

### Further Habitat Survey recommended (to support a planning application)

- 2.7 Further survey is likely to be required for areas where species-rich grassland, woodland, wetland or other more complex habitats have either been recorded or are likely to be present. Further survey will also be required for areas that could not be accessed.
- 2.8 Many of the hedgerows in the western parcel have the potential to be important under the Hedgerow Regulations 1997 due to their diversity and associated features (ditch, parallel hedgerow etc.). A dedicated hedgerow assessment would be required to determine which hedgerows would qualify as 'important'.

### **Protected and Priority Fauna**

- 2.9 The requirement for further survey relating to protected and Section 41 species are considered in Table 1 alongside a discussion on the constraint to development should these species be found.



Table 1. Summary of constraints related to Fauna

Fauna Group/ Species	Further survey required	Constraint	Details
Amphibians	Yes	High 2 if great crested newt (GCN) present	<p>There are numerous records of GCN (European Protected Species<sup>2</sup> (EPS)) breeding within 2km of the site. No GCN are discussed within the citations of any locally designated site surrounding the area. The closest record of GCN is located 0.68km south of the central parcel and connected to site via arable and pasture farmland. Common toad (section 41 priority species) was also identified within the desk study records.</p> <p>There are seven water bodies within the site boundaries, with a varying suitability for amphibian breeding habitat. A number of the ponds did not contain any aquatic vegetation at the time of survey or were ephemeral in nature and may not be present during the amphibian breeding season. Some ponds are permanent features, containing suitable aquatic vegetation and surrounding edge habitat for amphibian species.</p> <p>Presence/absence surveys would be required to determine whether great crested newt are within the site boundary. If confirmed as present, and developmental impacts are unavoidable, a development licence from Natural England would be required to permit development and mitigate for aquatic or terrestrial habitat loss, habitat severance and fragmentation and risk of killing or injury.</p> <p>Compensation for GCN breeding habitat losses or isolation, include a requirement to provide two mitigation ponds for each breeding pond to be lost, and replacement terrestrial habitats on a like-for-like basis. Should GCN be identified on site, therefore, areas within 500m of GCN ponds could be constrained due to the need for a licence to cover the works and also habitat compensation for terrestrial habitat loss.</p>
Reptiles	Yes	Low	<p>No records of reptile species was identified within 2km of the site boundaries.</p> <p>The site provides some areas of suitable habitat for reptiles including water bodies, areas of marshy grassland, hedgerows, ditches and woodland edge habitat.</p> <p>The areas of the site where it is considered the greatest risk of reptiles being present are the Central Eastern Parcel, in particular the marshy grassland habitat (TN6), and woodland within the Central Western Parcel (TN26).</p> <p>Reptile surveys may be required if impacts on habitats suitable for reptiles cannot be avoided. If reptiles are present, reasonable avoidance measures or a more formal mitigation strategy will be required although the risk of finding reptiles is considered to be relatively low.</p>

<sup>2</sup> European Protect Species (EPS) are animals and plants that are listed under Annex IV of the European Habitats Directive and receive protection in England under Regulation 41 of The Conservation of Habitats and Species Regulations (2017).

Fauna Group/ Species	Further survey required	Constraint	Details
Birds	<p>Yes: Breeding birds and wintering bird surveys</p> <p>Yes: Barn Owl survey</p>	<p>Medium depending on findings of bird surveys</p>	<p>The desktop search returned numerous records of Schedule 1 and S41 bird species within 2km of the Dunston site, mainly in association with the surrounding locally designated sites, the River Penk and Acton Trussel and Staffordshire and Worcestershire Canal, 0.18km east, which is surrounded by broad-leaved woodland.</p> <p>The open agricultural fields are likely to offer foraging habitat for overwintering birds, therefore a wintering bird survey will be required. If the area is identified as important for overwintering birds and these areas cannot be avoided, there may be a requirement for mitigation.</p> <p>There is suitable nesting bird habitat within buildings, hedgerow, woodland, scrub and tree habitats, and suitable habitats for ground nesting birds across the semi-improved grassland and arable fields. Breeding bird surveys would therefore be required across the entire site. Loss of suitable habitat should be timed to avoid the bird nesting period and new planting within the masterplan would compensate for the loss of nesting and foraging habitat as it matures.</p> <p>Schedule 1 species Kingfisher records are associated with the River Penk which runs adjacent to the east of site. Barn owl and hobby (both Schedule 1 species) have been identified on or adjacent to the site. Both species forage within grassland, farmland and woodland habitats which dominate the Dunston site. Several of the farm buildings within the site may offer potential for barn owl nesting, so further survey of buildings, suitable trees and foraging habitats would be required and mitigation may be necessary.</p>



Fauna Group/ Species	Further survey required	Constraint	Details
Bats	Yes: nocturnal activity surveys and daytime inspection of buildings and trees (subsequent nocturnal tree or building roost surveys as necessary).	Medium if roosts found	<p>Several species of bats have been recorded within 2km which may use the site for foraging and commuting routes. Bat activity surveys will be required to determine key commuting routes although these are expected to be focussed around the areas of woodland, larger watercourses and hedgerows. The scope of the surveys would depend on the areas likely to be impacted by the development. The loss of bat foraging habitat and habitat severance impacts can be mitigated within the design by avoiding commuting routes and through habitat management and creation.</p> <p>There are also a number of buildings across the site which may present suitability for roosting bats (EPS). A large number of the trees on site are mature oaks and ash with multiple features that provide suitability for roosting bats - initial suitability assessment results are shown on the Phase 1 Habitat map (G7960.006). The woodland parcels across the site would also require a ground based tree assessment if affected by development plans as they contains semi-mature to mature trees which may contain roosting features.</p> <p>Should any building or tree require removal to facilitate development or are otherwise adversely impacted during construction or post-construction activities / lighting installations, further survey would be required to assess their potential to support bats. Surveys would need to include any areas of woodland and trees which were not fully assessed during the initial site survey. Further nocturnal surveys are also likely to be required should any buildings or trees with medium - high roosting suitability be proposed for demolition/felling.</p> <p>In the event that a roost is identified, a Natural England licence would be required and replacement roosts may need to be provided within the built development.</p> <p>Bat boxes should be incorporated into the landscaping proposals, within areas of native planting and close to retained green corridors. Proposals should avoid light spill and glare onto identified roosts, commuting routes, wildlife corridors and woodland.</p>
Badger	Yes	Medium if sett is found	<p>Whilst the site offers suitable habitats for sett building, commuting and foraging, no badger setts were found within the site. There was no evidence of badger (paths, prints, foraging signs, hairs or latrines) within the site. Signs of digging were recorded within the mixed woodland in the south west of the central west parcel but no sett was found and no other evidence to suggest this digging resulted from badger activity.</p> <p>There are no current implications for the development with regard to badgers, however a more detailed survey will be required of woodland areas.</p>

Fauna Group/ Species	Further survey required	Constraint	Details
Otter & Water vole	Yes	Low	<p>There are numerous records of both otter and water vole associated with the River Penk, adjacent to the east of site.</p> <p>Ditches within the site are mainly found in association with hedgerows which are heavily shaded or encroached by dense scrub. Depth of water varied, although a large number of ditches were dry or holding a small amount of standing water. Flowing water was present in places, mainly within the centre parcels of land. Little aquatic vegetation was present and there was a lack of earth banks which could provide sites of burrows or holt creation. A number of ditches within the centre of the site are culverted under tracks for access between fields, or terminate in ponds.</p> <p>The majority of ditches appeared unsuitable for water vole and otters and no burrows or holts were identifying during the initial site visit.</p> <p>Development plans should avoid areas within 8m of the banks of the River Penk to avoid impact to know water vole habitat. If water vole are present and their habitat cannot be avoided, licensing may be required.</p>
Schedule 9 Invasive Non- Native Plant Species	No	N/A	<p>No invasive, non-native species were recorded on site at the time of the site visit. No further invasive species have been identified within the historic species records for the site and surrounding 2km.</p>



## 3.0 Opportunities

- 3.1 There are opportunities to enhance biodiversity across the site through the process of development in line with National Planning Policy Framework (NPPF) and the Natural Environment and Rural Communities (NERC) Act 2006 under Section 40.
- 3.2 The masterplan should seek to retain areas identified as wildlife corridors and key wildlife areas (shown as a high constraint in the drawings section of this report) and enhance these through additional planting and woodland management.
- 3.3 Increased public pressure on locally designated sites would be reduced through the creation of large recreational areas on the site itself.
- 3.4 Further pond and swale creation alongside planting of woodland, scrub and grassland would enhance these areas for wildlife and strengthen green infrastructure through the site.
- 3.5 SUDS schemes should be used where possible with sensitive landscaping to incorporate drainage into any development. These areas will also provide additional habitats and corridors for wildlife.
- 3.6 Habitat creation, such as native hedgerows and wildflower meadows should be incorporated into the design throughout the development. Berry and nectar producing species should be included to provide additional foraging for wildlife.

## **APPENDIX A: Desk Study Report 7960.001**





THE  
ENVIRONMENT  
PARTNERSHIP

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**DUNSTON VILLAGE  
STAFFORDSHIRE  
ECOLOGY DESK BASED ASSESSMENT  
CONFIDENTIAL**

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Document Title	Dunston Village Ecology Desk Based Assessment
Prepared for	The Rigby Organisation
Prepared by	TEP - Warrington
Document Ref	7960.001

Author	Annabel Walker-Evans
Date	November 2019
Checked	Lynsey Crellin
Approved	Lynsey Crellin

Amendment History					
Version	Date	Modified by	Check / Approved by	Reason(s) issue	Status

**This desk based assessment contains confidential species records and should not be published in the public domain.**

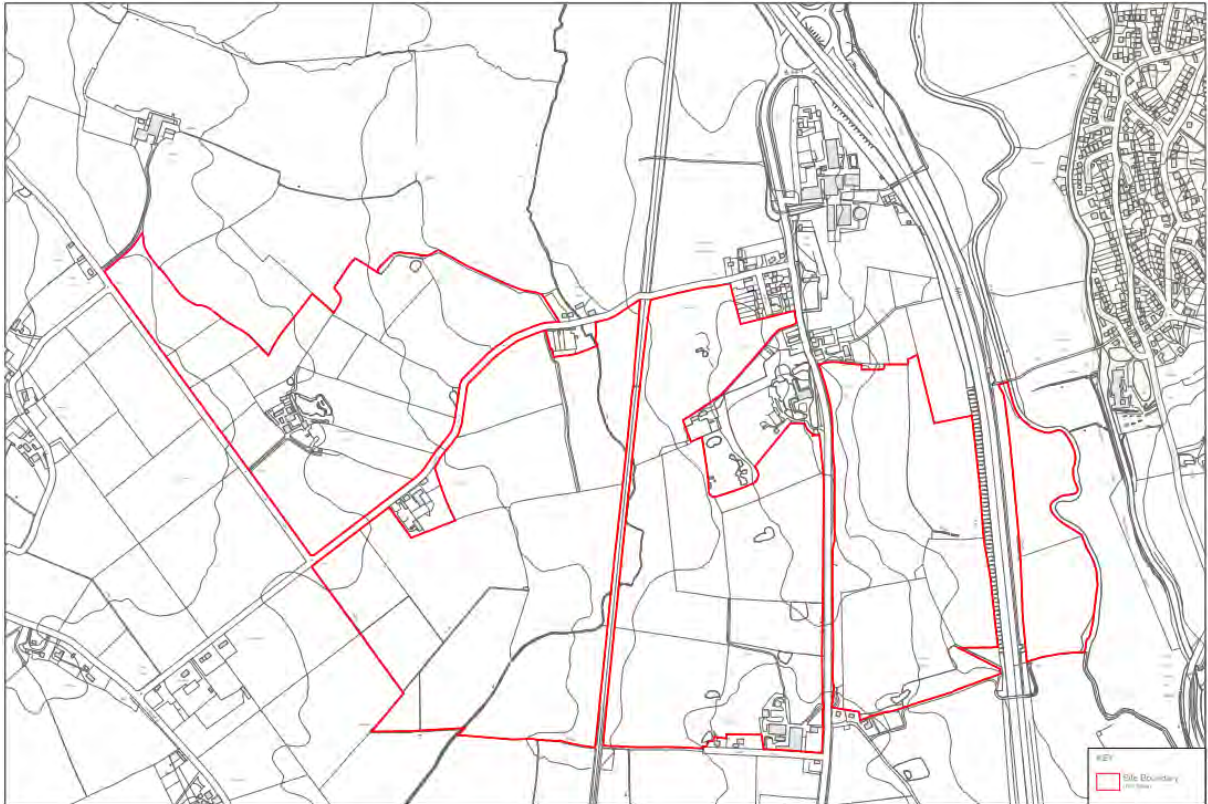


## Contents

- Site Location Plan
- Relevant Local Planning Policies
- Site Designations
- Notable Habitats
- Notable Species
- Local BAP Habitats and Species

# Site Location Plan

Approximate Central Grid Reference: SJ 92399 17011



Dunston Village, Staffordshire - Site Location Plan  
Date: 07/02/19 | Scale: 1:2500 @ A0



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## Relevant Local Planning Policies

### South Staffordshire Core Strategy Development Plan (adopted 11<sup>th</sup> December 2012)

South Staffordshire Local Plan provides the planning framework for all new development in South Staffordshire. The Local Plan contains a range of policies and land allocations, and is made up of two documents: the Core Strategy and Site Allocations document (SAD). These two plans replace the 1996 Local Plan and together deliver the local planning strategy for South Staffordshire.

The SAD, adopted in September 2018, sets out site specific proposals and policies for the use of land to guide future development, in order to help to deliver the vision and objectives of the Core Strategy.

Supplementary Planning Documents (SPDs) give more detailed guidance on policies or proposals in the Local Plan. SPDs do not contain new policy, but support the policies in the Local Plan by setting out in more detail how the policy will be applied.

### *Policies Map*

The Policies Map can be viewed by following the link below:  
<https://www.sstaffs.gov.uk/planning/interactive-local-plan-map.cfm>

The site and adjacent land is allocated as:

- Open Countryside;
- Retained BAS; and
- Open Space: Amenity

### *Biodiversity-related Planning Policies*

The following policies relate to biodiversity and nature conservation and are applicable to the site:

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

The rural regeneration of South Staffordshire will be delivered through the implementation of the following Spatial Strategy. The principal aim will be to meet local needs, whilst recognising the constraints that impact upon the District, and support and improve infrastructure and service delivery in the District.

Throughout the District, growth will be located at the most accessible and sustainable locations in accordance with the Settlement Hierarchy set out below and the Council will work with partners to deliver the infrastructure, facilities and services required to support this growth. An integral part of the Strategy will be to protect, maintain and enhance the natural and historic environment and the local distinctiveness of the District and retain and reinforce the current settlement pattern.

In relation to the District's existing communities and settlements, appropriate proposals which contribute to their improved sustainability, cohesion and community wellbeing, will be supported.

Development proposals will be expected to make efficient use of land and prioritise the use of Previously Developed Land (brownfield land) in sustainable locations, provided it is not of high environmental value, whilst safeguarding the character of existing residential areas.

### Main Service Villages

Bilbrook, Brewood, Cheslyn Hay, Codsall, Great Wyrley, Kinver, Penkridge, Perton and Wombourne are defined as **Main Service Villages** and will be the main focus for housing growth, employment development and service provision. Village centres will be the focus for new shopping and small scale office development to maintain their vitality and viability.

### Local Service Villages

Coven, Essington, Featherstone, Huntington, Pattingham, Swindon and Wheaton Aston are defined as **Local Service Villages** where limited development will be supported where it meets local needs, whilst recognising the constraints that impact upon the District. Employment development will be limited to that which meets local business and community needs and maintains the vitality and viability of these communities. Shopping and office development will be located in the village centres.

### Small Service Villages

Bednall, Bobbington, Bishops Wood, Dunston, Shareshill, and Trysull are defined as **Small Service Villages** where very limited development may be acceptable for the provision of rural affordable housing where it clearly supports a local need and contributes to the sustainability of those local communities. Employment development will be limited to rural employment and diversification which meets local business and community needs.



### Other Villages and Hamlets

The villages defined as **Other Villages and Hamlets** are not identified for growth, and development will only be permitted in exceptional circumstances for the provision of rural affordable housing to meet identified local needs. New development in these locations will therefore be limited to rural affordable housing schemes provided through rural exception sites and the conversion and re-use of redundant rural buildings to appropriate uses.

### Outside the Service Villages

Outside the service villages, the objective of the Spatial Strategy is to protect the attractive rural character of the countryside where new development will be restricted to particular types of development to meet affordable housing needs, support tourism, provide for sport and recreation and support the local rural economy and rural diversification.

As part of the strategy for employment and economic development, support will continue to be given to the four existing freestanding strategic employment sites (i54, Hilton Cross, ROF Featherstone/Brinsford and Four Ashes).

### The Green Belt and Open Countryside

The South Staffordshire portion of the West Midlands Green Belt as defined on the Policies Map, will be protected from inappropriate development and proposals will be considered in the light of other local planning policies and the policy restrictions relating to Green Belt in the NPPF, however the Council will consider favourably sustainable development which accords with this Spatial Strategy.

The general extent of the Green Belt and the area defined as Open Countryside will be protected and maintained for the Plan period but some land will need to be released from the Green Belt and Open Countryside in some locations at the Main and Local Service Villages to deliver the proposed development strategy and enable the sustainable growth of these villages. A partial review of Green Belt boundaries and a review of Major Developed Sites in the Green Belt will be carried out through the Site Allocations DPD.

### Delivering the Strategy

The Spatial Strategy will be delivered through the Core Policies and Development Policies. In all cases development should not conflict with the local planning policies, particularly the environmental policies. Development should be designed to be sustainable, seek to enhance the environment, and should provide any necessary mitigating or compensatory measures to address harmful implications.

## **Core Policy 2: Protecting and Enhancing the Natural and Historic Environment**

The Council will support development or other initiatives where they protect, conserve and enhance the District's natural and heritage assets including ecological networks internationally, nationally and locally important designations. Particular support will be given to initiatives to improve the natural environment where it is poor and increase the overall biodiversity of the District including the development of green infrastructure links and to improve the historic environment where it is identified as at risk.

Development or initiatives will generally be supported which:

- a) will not have a detrimental impact upon the interests and significance of a natural or heritage asset;
- b) are not contrary to the control of development within internationally, nationally or locally designated areas including the Green Belt and Open

Countryside, Cannock Chase Area of Outstanding Natural Beauty and Motte Meadows Special Area of Conservation, and contribute to the conservation and enhancement of the character of the landscape and local distinctiveness;

- c) are consistent with the sustainable management of the asset including the repair and reuse of historic buildings;
- d) protect and improve water and air quality;
- e) provide mitigation or compensatory measures to address any potential harmful implications and supporting enhancement measures.

Development proposals should be consistent with the NPPF, the Supplementary Planning Documents on the Historic Environment and Biodiversity and other local planning policies.

Development proposals should have regard to and support the actions and objectives of the Severn and Humber River Basin Management Plans (RBMPs) and also have regard to the River Severn and River Trent Catchment Flood Management Plans (CFMPs).



**Policy OC1: Development in the Open Countryside Beyond the West Midlands Green Belt**

The Open Countryside beyond the South Staffordshire portion of the West Midlands Green Belt as defined on the Policies Map will be protected for its own sake, particularly for its landscapes, areas of ecological, historic, archaeological, agricultural and recreational value.

Development within the Open Countryside will normally be permitted where the proposed development is for either:

- A.** A new or extended building, provided it is for:
- a) purposes directly related to agriculture or forestry; or
  - b) appropriate small-scale facilities for outdoor sport or recreation, nature conservation, cemeteries and for other uses of land which preserve the appearance or character of the Open Countryside beyond the Green Belt; or
  - c) affordable housing where there is a proven local need in accordance with Policy H2; or
  - d) limited infilling\* and limited extension(s), alteration or replacement of an existing building where the extension(s) or alterations are not disproportionate to the size of the original building, and in the case of a

replacement building the new building is not materially larger than the building it replaces. Guidance in these matters will be contained in the Green Belt and Open Countryside Supplementary Planning Document (SPD).

**B. The re-use of a building provided that:**

- e) the proposed use of any building (taking into account the size of any extensions, rebuilding or required alterations), would not harm the appearance or character and local distinctiveness of the Open Countryside beyond the Green Belt.

**C. Changes of Use of Land:**

- f) the carrying out of engineering or other operations, or the making of a material change of use of land, where the works or use proposed would have no material effect on the appearance and character of the Open Countryside beyond the Green Belt.

**D. Development brought forward under a Community Right to Build Order.**

Development proposals should be consistent with other local planning policies.

*\*Footnote: Limited infilling is defined as the filling of small gaps (1 or 2 buildings) within a built up frontage of development which would not exceed the height of the existing buildings, and not lead to a major increase in the developed proportion of the site.*



**Policy EQ1: Protecting, Enhancing and Expanding Natural Assets**

Permission will be granted for development (alone or in combination) which would not cause significant harm to sites and/or habitats of nature conservation, geological or geomorphological value, including ancient woodlands and hedgerows, together with species that are protected or under threat. Support will be given to proposals which enhance and increase the number of sites and habitats of nature conservation value, and to meeting the objectives of the Staffordshire Biodiversity Action Plan (SBAP).

In line with the objectives of the Water Framework Directive (WFD), development proposals must not adversely affect the ecological status of a water body and wherever possible take measures to improve ecological value in order to help meet the required status.

*International Sites*

Any proposed development that could have an adverse affect on the integrity of an international wildlife, geodiversity or landscape site (e.g. Natura 2000 or Ramsar site, Special Area of Conservation) or on ground water flows to those sites, alone or in combination with other plans or projects, will not be permitted unless it can be demonstrated that the legislative provisions to protect such sites can be fully met.

*National Sites*

Protected wildlife, geodiversity and landscape sites designated under national legislation are shown on the Policies Map [e.g. Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs)] and will be protected under the terms of that legislation.

*Local Sites*

Locally important sites are also identified [e.g. Sites of Biological Importance (SBIs), Regionally Important Geological Sites (RIGs), Local Nature Reserves (LNRs)] and will be protected and enhanced. Outside the areas designated, the interests of nature

conservation must be taken into account in accordance with national guidance.

The restoration or creation of new habitats and the expansion of habitats in South Staffordshire will be supported where these contribute to priorities in the UK Biodiversity Action Plan and the Staffordshire Biodiversity Action Plan including priority habitats such as native woodland, hedgerows, and lowland heathland. Areas or sites for the restoration or creation of biodiversity priority habitats will be identified through Biodiversity Opportunity Mapping working in partnership with Natural England, Staffordshire Wildlife Trust and Staffordshire County Council.

Wherever possible, development proposals should build in biodiversity by incorporating ecologically sensitive design and features for biodiversity within the development scheme.

Development proposals should be consistent with the Supplementary Planning Documents on Biodiversity and Landscape Character and other local planning policies.

#### **Policy EQ2: Cannock Chase Special Area of Conservation**

Development will only be permitted where it can be demonstrated that it will not be likely to lead directly or indirectly to an adverse effect upon the integrity of the Cannock Chase Special Area of Conservation (SAC).

A net increase of housing development within the areas of South Staffordshire that fall within the Zone of Influence around Cannock Chase SAC (as identified by current evidence and subject to further research) that is likely to have an adverse impact upon Cannock Chase SAC should mitigate for such effects, in line with the ongoing work to outline the pressures on the SAC caused by recreation and visitor pressure. This may include contributions to habitat management, access management and visitor infrastructure, publicity, education and awareness raising; and provision of suitable alternative natural green recreational space, within development sites where they can be accommodated and where they cannot by contributions to offsite alternative green space.

The effective avoidance of and/or mitigation for any identified adverse effects on the Cannock Chase SAC must be demonstrated to the Council as the Competent Authority and Natural England and secured prior to the Council giving approval of development. This Policy has jurisdiction over developments within South Staffordshire only; however it will be implemented jointly with neighbouring authorities via the application of complementary policies in partner Local Plans.

Development proposals should be consistent with other local planning policies.



**Policy EQ3: Conservation, Preservation and Protection of Heritage Assets**

The conservation and enhancement of South Staffordshire's historic environment will be achieved by a number of means:

a) The Council will establish, review and maintain records of known heritage assets including:

- Listed buildings
- Scheduled Ancient Monuments
- Conservation Areas
- Registered Parks and Gardens
- Buildings of Special Local Interest (a 'local list')
- Undesignated heritage assets
- Other historic landscapes

and will support and encourage ever greater appreciation, knowledge and enjoyment of the District's historic environment and heritage assets through:

- joint working with local communities and interest groups such as civic and historical societies;
- the continual development and refinement of the Local List; and
- interaction with the County Council's Historic Environment Record (HER).

b) The Council will support and encourage measures which secure the improved maintenance, management and sustainable reuse of heritage assets, particularly those which are identified nationally or locally as being at risk. Where necessary an assessment will be made of whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

c) The Council will ensure that development which affects a heritage asset or its setting will be informed by a proportionate assessment of the significance of the asset, including its setting, which is likely to be affected by the proposals. These will be judged by considering the extent to which an asset's archaeological, architectural, historic or artistic interest will be harmed, including its conservation, in the interest of present and future generations.

d) In the case of development in a conservation area proposals will be considered against any management plan and appraisal adopted for that area.

e) The Council will consider the significance and setting of all proposed works to heritage assets, informed by relevant guidance that is supported by English Heritage. In addition the following principles will be adhered to:

- minimising the loss and disturbance of historic materials
- using appropriate materials, and
- ensuring alterations are reversible

f) The Council will require all works proposed to heritage assets, or sites with the potential to include assets, to be informed by a level of historical, architectural and archaeological evidence proportionate to their significance. Where appropriate, the Council may also require historical research and archaeological recording to be undertaken before works to a heritage asset commence.

Heritage assets including Listed Buildings (and those on a local list) Registered Parks and Gardens (and other historic landscapes) Conservation Areas and Scheduled Ancient Monuments are identified on the Policies Map and Inset Plans.

Development proposals should be consistent with the NPPF, the adopted Village Design Guide Supplementary Planning Document (or subsequent revisions) and other local planning policies.

**Policy EQ4: Protecting and Enhancing the Character and Appearance of the Landscape**

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.

The Council will encourage and support the creation of new woodlands and the management of existing woodlands particularly where they contribute to community forestry. Reference should be made to the Council's Tree and Woodland Strategy.

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.

Proposals should retain and strengthen the components of landscape character and local distinctiveness, with particular attention to the detailing of any proposal and its relationship with existing buildings, features and vegetation. Proposals within the Historic Landscape Areas (HLA) defined on the Policies Map should have special regard to the desirability of conserving and enhancing the historic landscape character, important landscape features and the setting of the HLA. The County Council's Landscape Character Assessment and Historic Landscape Characterisation will provide an informed framework for the decision making process.

Where possible, opportunities should be taken to add character and distinctiveness through the contribution of new landscape features, particularly to landscapes which have been degraded.

Development within the Cannock Chase Area of Outstanding Natural Beauty (AONB) and its setting as shown on the Policies Map will be subject to special scrutiny, in accordance with national policy and any additional guidance, in order to conserve and enhance the landscape, nature conservation and recreation interests of the area.

Proposals that contribute to the objectives of the Cannock Chase AONB Management Plan, the Forest of Mercia and other local initiatives that will contribute to enhancing landscape character will be supported.

Development proposals should be consistent with the adopted Village Design Guide Supplementary Planning Document (or subsequent revisions), the Supplementary Planning Documents on Landscape Character and Biodiversity and other local planning policies.

**Policy HWB2: Green Infrastructure**

The Council will support the protection, maintenance and enhancement of a network of open space, natural and semi-natural greenspace in South Staffordshire and cross boundary links. The Council will support proposals to improve and expand the key components of this green infrastructure network including the enhancement of green corridors such as disused railway lines and the enhancement and creation of native woodlands. The Council will also support proposals for the enhancement of blue corridors such as canals, rivers, and other watercourses and promote the maintenance of undeveloped buffer zones along the banks of watercourses. Proposals to enhance the biodiversity value of the green infrastructure network providing opportunities for habitat creation and linkages will also be supported.

The network of green infrastructure should provide safe, accessible, high quality links between recreational areas and facilities, residential, leisure and commercial areas and also provide cross boundary links as well as access to the wider countryside. Such links should provide for walking, cycling and horse riding.

Development proposals that are consistent with and would contribute to the delivery of local green infrastructure initiatives and strategies including the Council's Open Space Strategy, Forest Of Mercia, Cannock Chase AONB Management Plan, Staffordshire Biodiversity Action Plan and the vision set out in the West Midlands Green Infrastructure Prospectus will be supported.

Development proposals should be consistent with other local planning policies.



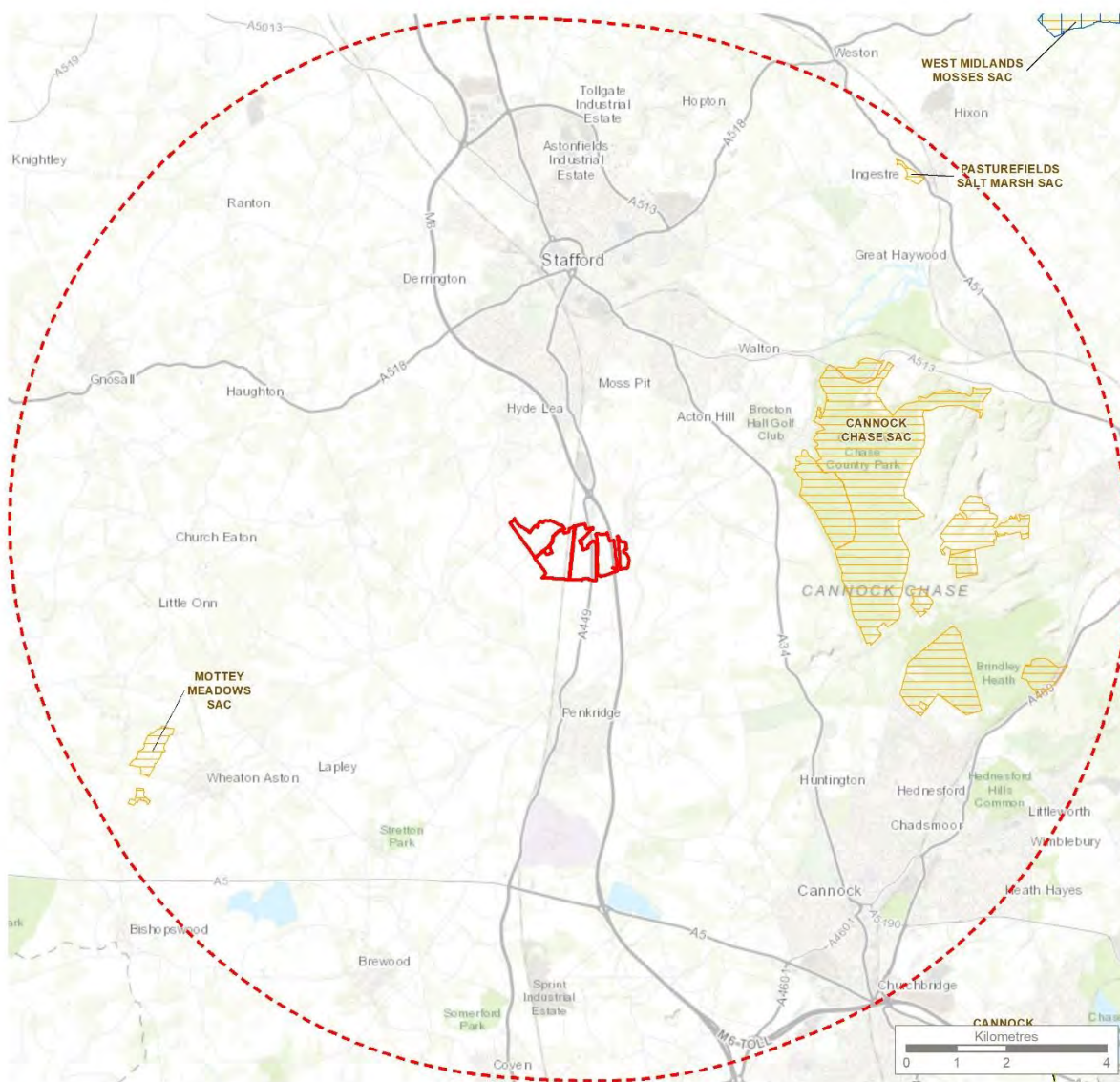
## Site Designations

### Internationally Designated Wildlife Sites within 10km of the Site

*Source: MAGIC Maps*

There are three internationally designated wildlife sites within 10km of the site.

<b>Name of Site</b>	<b>Designation</b>	<b>Distance from Site</b>	<b>Reason for Designation</b>
Cannock Chase	SAC	3.59km east	Presence of Annex 1 habitat European dry heath and wet heath that supports diverse flora.
Motty Meadows	SAC	7.95km south west	Supports Annex 1 habitat lowland hay meadows and diver flora.
Pasturefields Salt Marsh	SAC	9.17km north west	Presence of Annex 1 habitat inland salt meadows – only known example in the UK.



- Key**
- Site boundary
  - Site boundary - 10km buffer
  - Ramsar
  - Special Areas of Conservation (SAC)

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Dunston Village, Staffordshire

Internationally Designated Sites Within 10km Buffer

G7960.001

Scale	Date	
1:110,000 @ A4	02/12/2019	
Drawn	Checked	Approved
SA	JO	AWE

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Nationally Designated Wildlife Sites within 5km of the Site

*Source: MAGIC Maps*

There are two nationally designated wildlife sites within 5km of the site. Citation for Cannock Chase SSSI is provided below.

<b>Name of Site</b>	<b>Designation</b>	<b>Distance from Site</b>	<b>Reason for Designation</b>
Cannock Chase	Area of Outstanding Natural Beauty (AONB)	3.27km east	Designated in 1958 for local and national importance, supporting floristically diverse wet heath and woodland habitats.
Cannock Chase	Site of Special Scientific Interest (SSSI)	3.59km east	Of importance to invertebrate populations and provides habitats which support 5 bat species, adder, common lizard and nightjar.

COUNTY: STAFFORDSHIRE

SITE NAME: CANNOCK CHASE

DISTRICT: Stafford/Cannock Chase

SITE REF: 15WDD

Status: Site of Special Scientific Interest (SSSI) notified (Under Section 28 of the Wildlife and Countryside Act) 1981 as amended

Local Planning Authority: STAFFORDSHIRE COUNTY COUNCIL, Stafford Borough Council/Cannock Chase District Council

National Grid Reference: SJ 990180

Area: 1264.3 (ha.) 3124.0 (ac.)

Ordnance Survey Sheet 1:50,000: 127

1:10,000: SJ 91 NE, SK 01 SW, SE 92 SW, SK 02 SW, SK 01 NW

Date Notified (Under 1949 Act): 1951

Date of Last Revision: 1968

Date Notified (Under 1981 Act): 1987

Date of Last Revision: –

#### Other Information:

- 1 Part of the site is managed as a Local Nature Reserve.
- 2 A part of the site lies within Cannock Chase County Park.
- 3 The site is listed in 'A Nature Conservation Review' edited by D A Ratcliffe (Cambridge University Press 1977).
- 4 Site boundary alteration (extension & reduction).
- 5 Site includes former SSSI's known as 'Penkrige Bank' and 'Upper Stafford Brook'.
- 6 Site lies within Cannock Chase Area of Outstanding Natural Beauty.

#### Description and Reasons for Notification:

A large, diverse area of seminatural vegetation comprising the most ecologically valuable parts of the former Royal Chase, one of a nationally important series of relict ancient Forest/Chase landscapes in the Midlands. Acidic soils derived from Triassic sandstone and marls support a range of woodland and scrub types of varied origin. The area of lowland heathland is the most extensive in the Midlands. Its special interest also reflects an unusual floristic character, intermediate between heathlands of northern and upland England and Wales and those of southern counties. The valley mire/wet heath communities are rare, threatened vegetation types, being some of the most floristically-rich and representative examples of their type in central England. The outstandingly diverse invertebrate fauna includes many species of restricted national occurrence.

The woodlands of Cannock Chase are predominantly dry oak-birch woodlands, though four main types are recognised. The mature sessile oak *Quercus petraea* – silver birch *Betula pendula* stand at Brocton Coppice is an eastern outlier of a mainly western formation. The beetle fauna here is of special interest for the presence of a group of species indicative of ancient woodland sites with a continuity of old timber trees. As those conditions are rare, so are their dependent species and Brocton is a refuge for some beetles at the northern limits of their British range. Colonisation of heathland by silver birch over many years has resulted in closed birch canopies of differing ages on much of Penkrige Bank and in the Brocton area. These stands are noteworthy for their floristic impoverishment. Bracken *Pteridium aquilinum*, bilberry *Vaccinium myrtillus* or wavy hair-grass *Deschampsia flexuosa* are the main ground flora constituents, and rowan *Sorbus aucuparia* is often an associated tree. Young birch, locally with scots pine *Pinus sylvestris*, is invading open ground in any parts of the site and a rapid progression towards woodland is evident where tree density is greatest. In damper situations alder *Alnus glutinosa* becomes locally abundant. The alder carr of the lower Sherbrook valley and the stream bottoms draining Penkrige Bank is thought to form the largest area of this woodland type



in Staffordshire. Scrub of grey willow *Salix cinerea* also occurs in the valley systems, achieving greatest cover in the Oldacre valley.

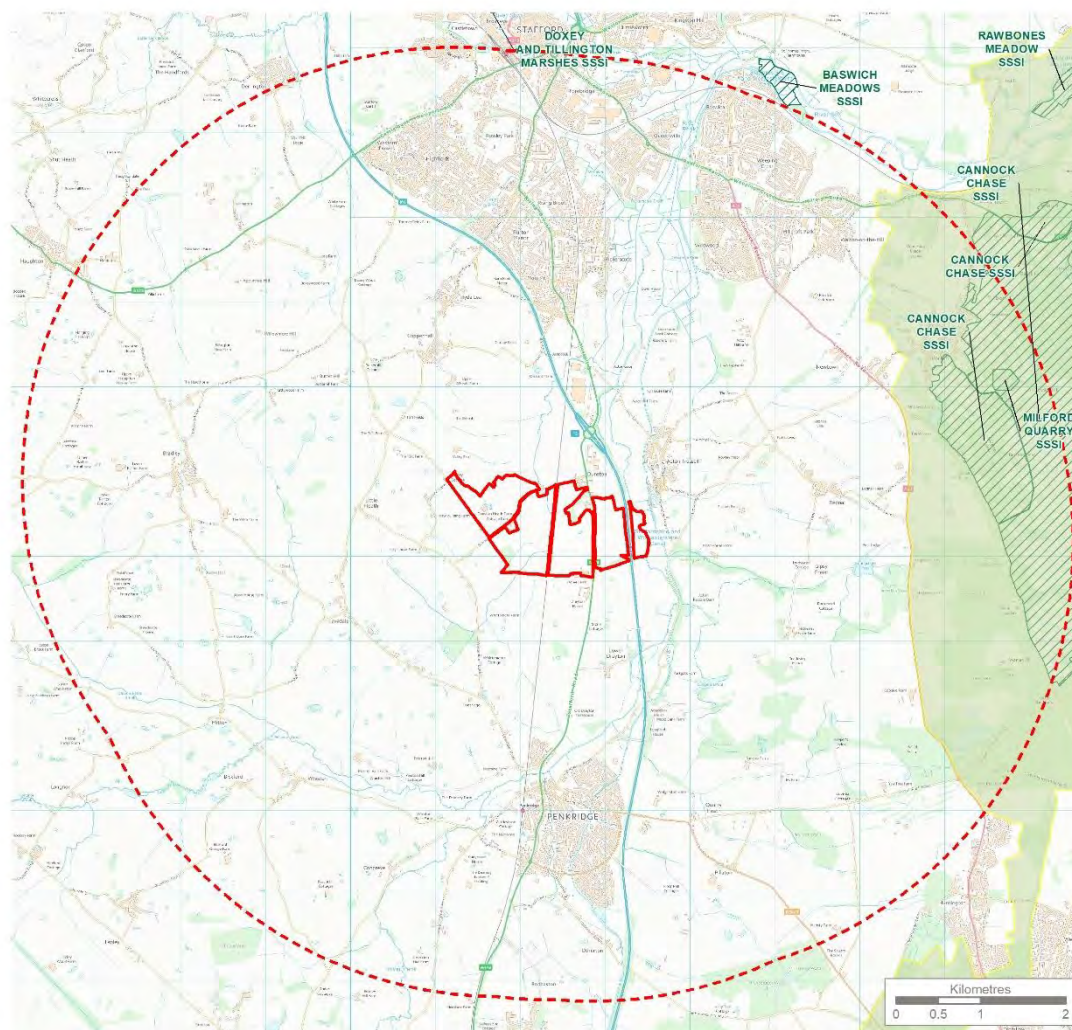
The loss and fragmentation of heathland since 1800 has drastically reduced its extent throughout Europe. In lowland England this has been by at least 75%, never-the-less the heaths that remain are amongst the most extensive and intact in Europe. Those of Cannock Chase, whilst occupying a small portion of their original area, are collectively the largest remnant of this habitat in the Midlands. Three elements distinguish Cannock from most other lowland heaths in Britain. Firstly the geographical location and altitude is responsible for a grouping of heathland plants of varied distribution patterns. Thus heather *Calluna vulgaris*, bell heather *Erica cinerea* and cross-leaved heath *E. tetralix* are species of west European oceanic distribution. Mixed with these are plants found most abundantly in continental northern latitudes eg bilberry and others typically associated with arctic and alpine regions eg cowberry *Vaccinium vitis-idaea* and crowberry *Empetrum nigrum*. Secondly, Cannock is the main British station for the hybrid bilberry *Vaccinium intermedium*, a plant of restricted occurrence in central-northern England. Thirdly, the distinct scarcity of lichens and mosses is in sharp contrast with the nearest submontane heathlands, those of the South Pennines and Welsh Borders. In a few moister situations, such as south of Ansons Bank, the vegetation is dominated by purple moor-grass *Molinia caerulea* with cottongrasses *Eriophorum* spp. Elsewhere, on dry, burnt or disturbed ground wavy hair-grass and bracken dominate, the latter especially on steeper slopes. Scrub of gorse *Ulex* spp. and hawthorn *Crataegus monogyna* provides further habitat variety in areas subject to past disturbance.

The scarcity of water over much of the Chase effectively confines wetland flora and fauna to the stream valley systems and a scatter of natural and artificial pools and damp depressions. The Oldacre and Sherbrook valleys have small-scale mosaics of spring-fed mire and wet heath vegetation, a result of complex water chemistry. Where acidic conditions prevail the mires are mostly formed of bog mosses *Sphagnum* spp. with cranberry *Vaccinium oxycoccus*, cottongrasses and cross-leaved heath. They have close counterparts in the valley mires of the New Forest and form a geographical and ecological link between the latter southern types and their northern equivalents. This community contains several plants rare in the county and or nationally uncommon eg marsh fern *Thelypteris thelypteroides*, round-leaved sundew *Drosera rotundifolia*, few-flowered spike-rush *Eleocharis quinqueflora* and bog asphodel *Narthecium ossifragum*. Locally, nutrient enriched springwater gives rise to flushed ground rich in sedges and flowering plants including such uncommon species as dioecious sedge *Carex dioica*, long-stalked yellow-sedge *C. lepidocarpa*, common butterwort *Pinguicula vulgaris* and grass of Parnassus *Parnassia palustris*. In lowland situations these mire communities are now extremely uncommon in the Midlands. Tall sedge 'fen' occupies much of the Sherbrook valley with abundant greater tussock-sedge *Carex paniculata* and narrow buckler-fern *Dryopteris carthusiana*. These two species also occur in association with alder carr. The pool in Milford Quarry is locally important for amphibians and, as with standing waters elsewhere on the Chase, also for dragonflies and damselflies.

Of the invertebrate fauna the moths and beetles have special prominence. The former include many notable woodland species such as the angle-striped sallow *Enargia paleacea*, argent and sable *Rheumaptera hastata*, and alder kitten *Furcula bicuspis*. The heathland and mires support a further range of Lepidoptera including the small pearl-bordered fritillary *Boloria selene*, the anomalous *Stilbia anomala* and the grass wave *Perconia strigillaria*. Of the numerous beetles, *Pediacus dermestoides* and *Biplophorus minutus* are two of the rarer old timber specialists and *Gnypeta velata* an uncommon wetland species with southern affinities. Amongst the other insect groups, bog bush-cricket *Metrioptera brachyptera* occurs here at its only county locality.

The large size and mixed vegetation of Cannock Chase supports a major breeding concentration of fallow deer *Dama dama*, which probably contains the genetic residue of the late Mediaeval herds. The Chase as a whole has a nationally significant population of

nightjar *Caprimulgus europaeus* and most territories are located within the Site of Special Scientific Interest. The red squirrel *Sciurus vulgaris* occurs in Scots pine woodland around Brindley Heath which is otherwise absent from central southern England. Other animals of note include five species of bat, adder *Vipera berus* and common lizard *Lacerta vulgaris*.



- Key**
- Site boundary
  - Site boundary - 5km buffer
  - Areas of Outstanding Natural Beauty
  - Sites of Special Scientific Interest (SSSI)

**THE ENVIRONMENT PARTNERSHIP**  
 Genesis Centre, Birchwood Science Park, Warrington WA3 7BH  
 Tel 01925 844004 e-mail tep@tep.uk.com www.tep.uk.com

Project  
 Dunston Village, Staffordshire

Title  
 Nationally Designated Sites Within 5km Buffer

Drawing Number  
 G7960.002

Scale 1:62,000 @ A4	Date 02/12/2019
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Drawn SA	Checked JO	Approved AWE
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## SSSI Impact Risk Zones for Site Only

*Source: MAGIC Maps*

The site is located within the Impact Risk Zone of Cannock Chase SSSI, located 3.59km east of the site boundary.

### SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England)

#### **1. DOES PLANNING PROPOSAL FALL INTO ONE OR MORE OF THE CATEGORIES BELOW?**

2. IF YES, CHECK THE CORRESPONDING DESCRIPTION(S) BELOW. LPA SHOULD CONSULT NATURAL ENGLAND ON LIKELY RISKS FROM THE FOLLOWING:

#### **All Planning Applications**

##### **Infrastructure**

Airports, helipads and other aviation proposals.

##### **Wind & Solar Energy**

##### **Minerals, Oil & Gas**

##### **Rural Non Residential**

##### **Residential**

Any residential developments with a total net gain in residential units.

##### **Rural Residential**

Any residential developments outside of existing settlements/urban areas with a total net gain in residential units.

##### **Air Pollution**

Any industrial/agricultural development that could cause AIR POLLUTION (incl: industrial processes, livestock & poultry units with floorspace > 500m<sup>2</sup>, slurry lagoons > 750m<sup>2</sup> & manure stores > 3500t).

##### **Combustion**

General combustion processes >50MW energy input. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/ combustion.

##### **Waste**

##### **Composting**

##### **Discharges**

Any discharge of water or liquid waste of more than 20m<sup>3</sup>/day to ground (ie to seep away) or to surface water, such as a beck or stream (NB This does not include discharges to mains sewer which are unlikely to pose a risk at this location).

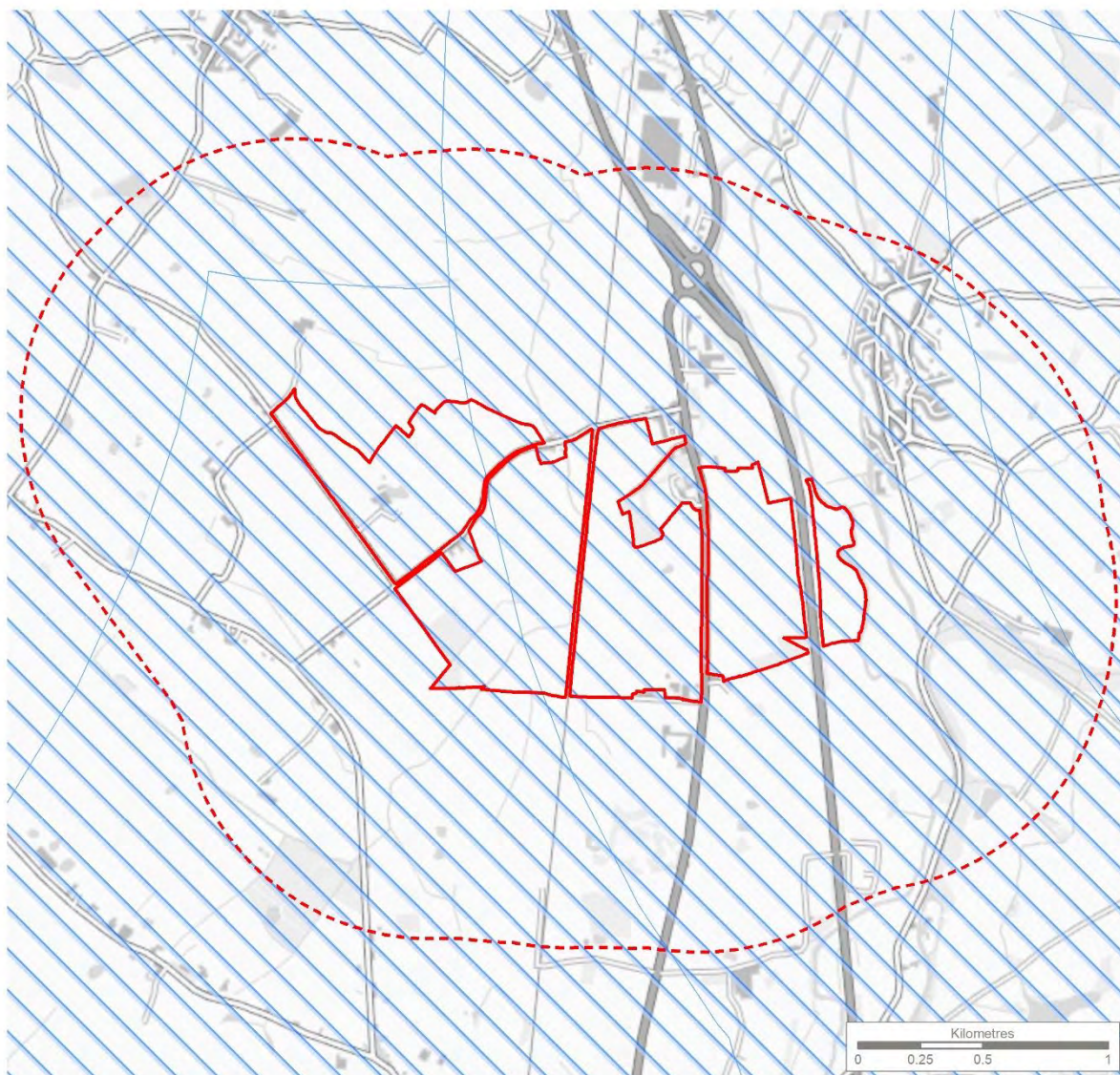
##### **Water Supply**

##### **Notes 1**

##### **Notes 2**

#### **GUIDANCE - How to use the Impact Risk Zones**

[/Metadata for magic/SSSI IRZ User Guidance MAGIC.pdf](#)



**Key**

- Site boundary
- Site boundary - 1km buffer
- Sites of Special Scientific Interest - Impact Risk Zone



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Project  
**Dunston Village, Staffordshire**

Title  
**Sites of Special Scientific Interest - Impact Risk Zone**

Drawing Number  
**G7960.004**

Scale	Date
<b>1:22,000 @ A4</b>	<b>02/12/2019</b>

Drawn	Checked	Approved
<b>SA</b>	<b>JO</b>	<b>AWE</b>

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### Watercourses within or Adjacent to the Site

Main rivers are statutory watercourses designated by the Environment Agency (in England). 'Main rivers' are usually larger streams and rivers, but some of them are small watercourses of significance. Works within 8m of main rivers are generally prohibited or require permission as there could be flood risk implications.

The River Penk runs adjacent to the east boundary of the site.

### Local Site Designations within 1km of the Site

Source: *Staffordshire Ecological Record (SER)*

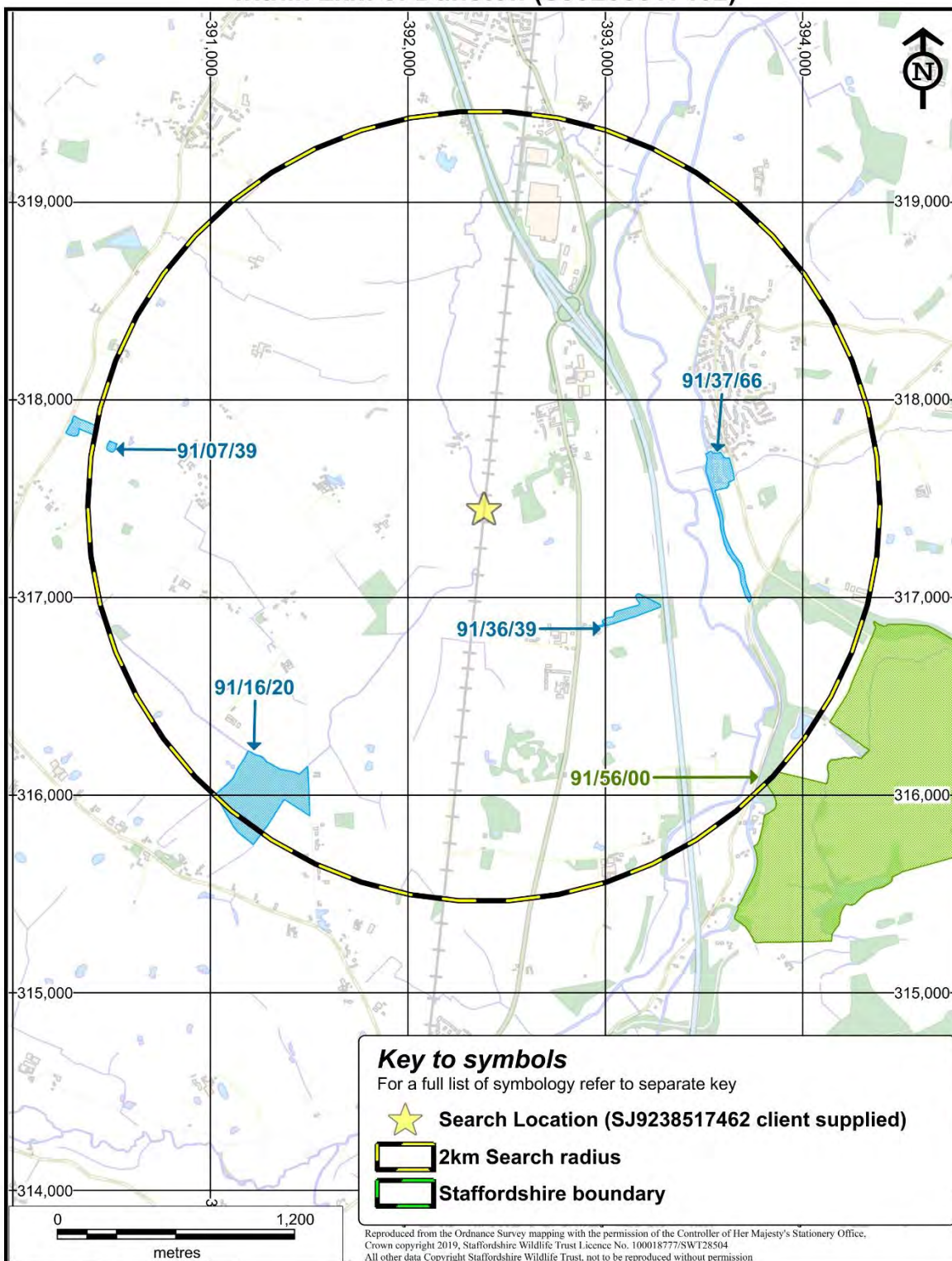
There are no locally designated wildlife sites within 1km of the site.

Note: The terms and conditions attached to the SER search state that data is valid for one year, after which time a review of the data may be required.

Site ID	Grid ref	Name of Site	Designation	Distance from Site	Reason for Designation
91/36/39	SJ933169	Cockpit Plantation	Retained BAS	Within the southern boundary of site.	Supports broad-leaved woodland habitat.
91/37/66	SJ936176	The Moathouse, Acton Trussel and S+Worcs Canal	Retained BAS	0.18km east	Canal and adjacent fish ponds surrounded by broad-leaved woodland habitat.
91/16/20	SJ912160	The Whittamoors	Retained BAS	0.80km south west	Presence of mixed broad-leaved woodland and scrub habitats.
91/07/39	SJ903179	Little Heath (land north of)	Retained BAS	0.82km west	Supports pools, scattered tree and scrub as well as grassland habitats.
91/56/00	SJ950160	Teddesley Park	Local Wildlife Site	1.82km south east	Supports varied habitat of arable fields, wood-pasture and areas of planted broad-leaved woodland & eutrophic pools. 32 veteran trees are also present within the site.



**Nature Conservaion Sites  
 within 2km of Dunston (SJ9238517462)**



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## Notable Habitats

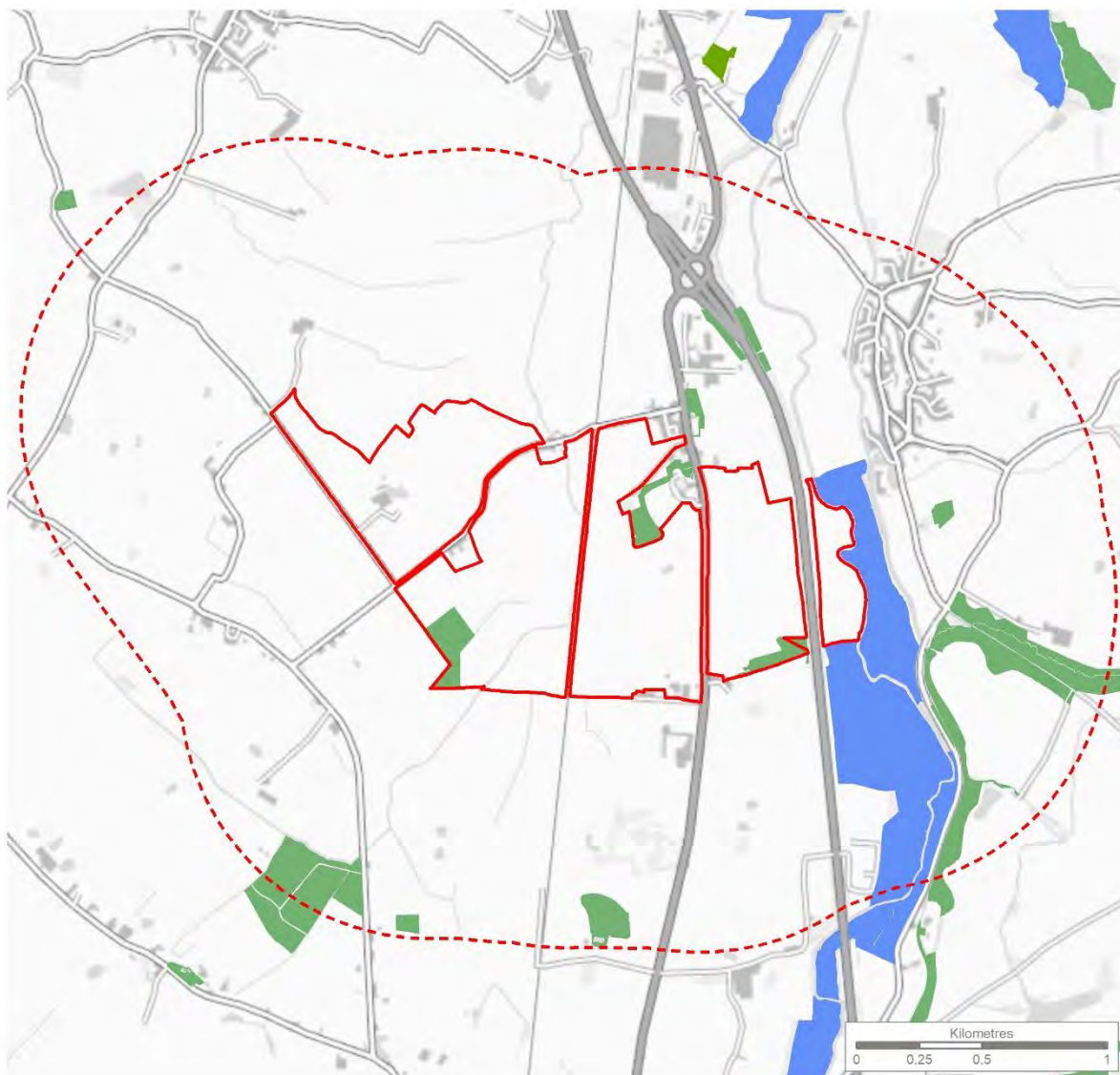
### Habitat Inventory Data within or Adjacent to the Site

*Source: MAGIC Maps*

Priority Inventory Habitat deciduous woodland is present within the site, adjacent to the southern boundary within Cockpit plantation BAS in the east and 200m east of School Lane in the west of site.

Deciduous woodland is also present outside of the site boundaries, present adjacent to the northern boundary of site, west of the A449. Coastal and floodplain grazing marsh is also present adjacent to the east boundary of site, on the east bank of the River Penk, and adjacent to the south boundary of site, east of the M6.





**Key**

- Site boundary
- Site boundary - 1km buffer
- Coastal and floodplain grazing marsh
- Deciduous woodland
- Traditional orchard

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Project  
**Dunston Village, Staffordshire**

Title  
**Priority Habitat Index Plan**

Drawing Number  
**G7960.005**

Scale	Date
<b>1:22,000 @ A4</b>	<b>02/12/2019</b>

Drawn	Checked	Approved
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## Notable Species

### Extract of Species Data within 2km of the Site

Source: SER

Note: The terms and conditions attached to the SER search state that data is valid for one year, after which time the search may require updating.

Species records which are listed under the following have been included:

- European Protected Species (EPS);
- Protected bird species under Schedule 1 of the Wildlife and Countryside Act 1981, as amended (WCA1);
- Protected animal species under Schedule 5 of the Wildlife and Countryside Act 1981, as amended (WCA5);
- Protected plant species under Schedule 8 of the Wildlife and Countryside Act 1981, as amended (WCA8);
- Invasive non-native species under Schedule 9 of the Wildlife and Countryside Act 1981, as amended (WCA9);
- Protection of Badgers Act 1992 (PBA);
- Species of principal importance under Section 41 of the Natural Environment and Rural Communities Act 2006; and
- Red and Amber listed Birds of Conservation Concern (BRd/BAm).



**Staffordshire Ecological Record**




The Wolsley Centre, Wolsley Bridge,  
Stafford, ST17 0WT  
Tel: 01889 880100 Fax: 01889 880101  
Email: info@staffs-ecology.org.uk

## A legend to the map showing Nature Conservation Sites and Species




**Introduction**

These colours are used on the site alert mapping within the SWT GIS, but SER cannot guarantee the same colours are used in any other mapping system, particularly those based on ArcView.

**Statutory Designations from Natural England's web-site**

- |   |                                      |   |  |
|---|--------------------------------------|---|--|
|  | National Nature Reserves             | ★ | NNR (boundary not available owing to OS restrictions)  |
|  | Sites of Special Scientific Interest | ★ | SSSI (boundary not available owing to OS restrictions) |
|  | Local Nature Reserves                | ★ | LNR (boundary not available owing to OS restrictions)  |

**Non-statutory Designations from the Staffordshire Grading System (1995 onwards)**

- |   |  |
|---|--|
|  | Site of Biological Importance (ex Grade 1 SBI) equivalent to "Local Wildlife Site" |
|  | Biodiversity Alert Site (ex Grade 2 SBI)   |
|  | Proposed/potential Site of Biological Importance                                   |


**Geological Sites**

- |  |   |
|--|---|
|  | Regionally Important Geological/geomorphological Site (= Local Geological Site) |
|--|---|



**Staffordshire Wildlife Trust Sites**

- |   |                     |
|---|---------------------|
|  | SWT Nature Reserves |
|---|---------------------|

**Other Nature Reserves**

- |   |   |
|---|---|
|  | Royal Society for the Protection of Birds |
|---|---|

**Ancient Woodland Inventory**

- |   |                                 |
|---|---------------------------------|
|  | Ancient & Semi-natural Woodland |
|  | Ancient Replanted Woodland      |

**Species Information**

- |   |   |   |  |
|---|---|---|--|
|  | Mammals excluding those listed below                  |  | Amphibians and reptiles excluding those below        |
|  | Otter ( <i>Lutra lutra</i> )                          |  | Great Crested Newt ( <i>Triturus cristatus</i> )     |
|  | Badger ( <i>Meles meles</i> ) - not normally supplied |  | Native Crayfish ( <i>Austropotamobius pallipes</i> ) |
|  | Water Vole ( <i>Arvicola terrestris</i> )             |  | Flowering plants except those below                  |
|  | All bat species                                       |  | Bluebell ( <i>Hyacinthoides non-scripta</i> )        |
|  | All bird species                                      |  | Butterflies and Moths                                |
|  | Any other protected species (precise to 100m)         |  | BAP Species Records (precise to 100m)                |
|  | All Protected Species Records (precise to 1km)        |  | BAP Species Records (precise to 1km)                 |

**Notes:**

The Local Nature Reserve and other nature reserve boundaries can overlay the current grading when both layers are actively visible

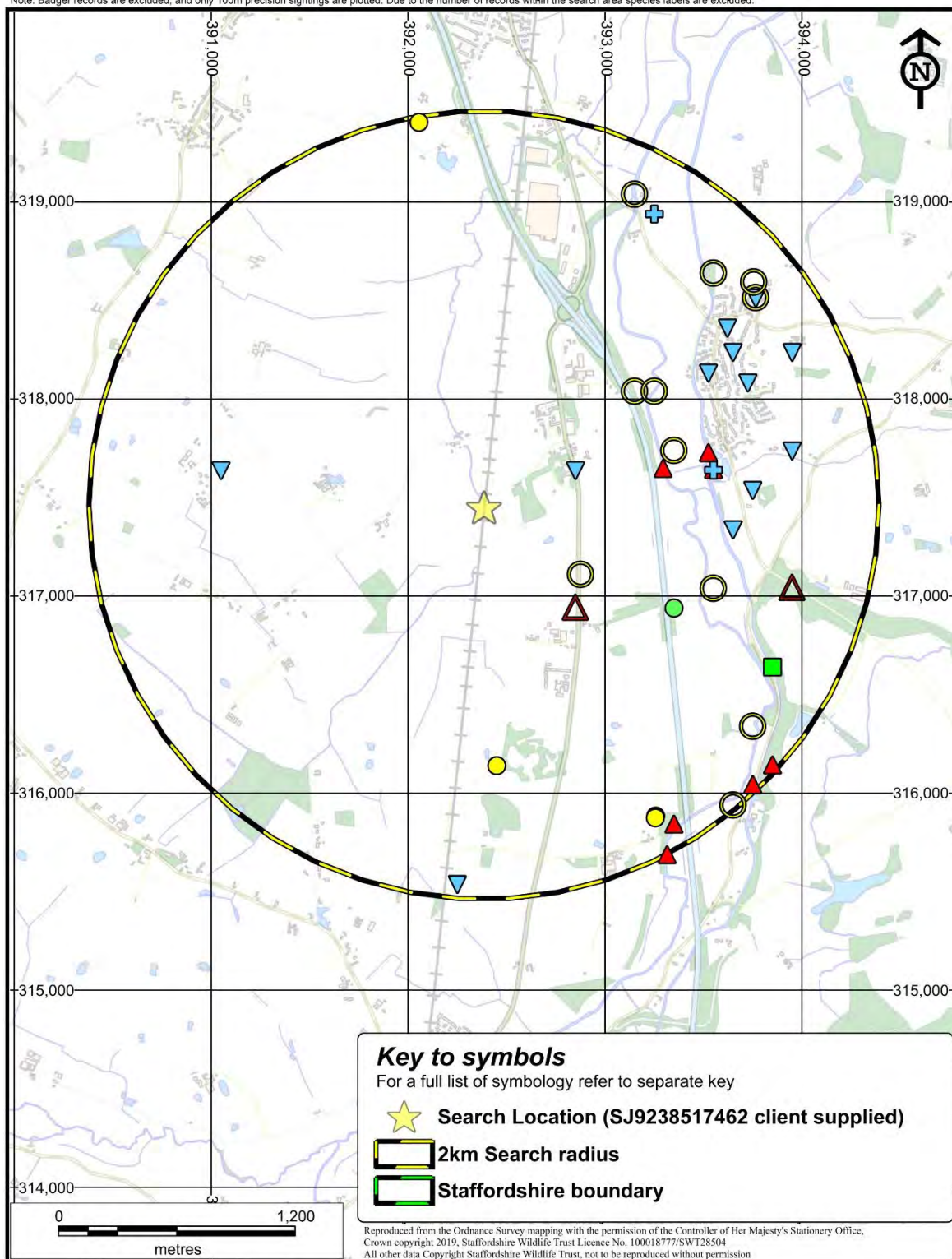
Where there are multiple species records for the same grid reference the dot for one species may obscure the dots for other species - all species records will be displayed in the accompanying spreadsheet

Not all the above categories may be present on the accompanying map

Version 2.0 July 2011

**Protected Species  
 within 2km of Dunston (SJ9238517462)**

Note: Badger records are excluded, and only 100m precision sightings are plotted. Due to the number of records within the search area species labels are excluded.





## Compostie list of species records within 2km of site.

Scientific Name	Common Name	Informal Group	European Protection	UK Protection	Principle Concern	No. Of Recs.	Most Recent	First Known
<i>Bufo bufo</i>	Common Toad	amphibian	No	No	Yes	5	2015	2012
<i>Triturus cristatus</i>	Great Crested Newt	amphibian	Yes	Yes	Yes	31	2017	2014
<i>Actitis hypoleucos</i>	Common Sandpiper	bird	No	No	No	1	2003	2003
<i>Alauda arvensis</i>	Skylark	bird	No	No	Yes	14	2017	2000
<i>Alcedo atthis</i>	Kingfisher	bird	Yes	Yes	No	9	2016	1989
<i>Anas clypeata</i>	Shoveler	bird	No	No	No	1	2015	2015
<i>Anas crecca</i>	Teal	bird	No	No	No	3	2015	2015
<i>Anas penelope</i>	Wigeon	bird	No	No	No	4	2015	2013
<i>Anas platyrhynchos</i>	Mallard	bird	No	No	No	17	2017	1998
<i>Anas strepera</i>	Gadwall	bird	No	No	No	3	2004	2004
<i>Anser anser</i>	Greylag Goose	bird	No	Yes	No	1	2015	2015
<i>Anthus pratensis</i>	Meadow Pipit	bird	No	No	No	3	2000	1990
<i>Branta leucopsis</i>	Barnacle Goose	bird	Yes	No	No	1	2007	2007
<i>Chroicocephalus ridibundus</i>	Black-headed Gull	bird	No	No	No	11	2015	2009
<i>Columba oenas</i>	Stock Dove	bird	No	No	No	1	2010	2010
<i>Cuculus canorus</i>	Cuckoo	bird	No	No	Yes	12	2014	2001
<i>Cygnus cygnus</i>	Whooper Swan	bird	Yes	Yes	No	3	2015	2002
<i>Cygnus olor</i>	Mute Swan	bird	No	No	No	20	2016	1998
<i>Delichon urbicum</i>	House Martin	bird	No	No	No	16	2016	2003
<i>Dendrocopos minor</i>	Lesser Spotted Woodpecker	bird	No	No	Yes	5	2006	2001
<i>Egretta garzetta</i>	Little Egret	bird	Yes	No	No	5	2018	2002
<i>Emberiza calandra</i>	Corn Bunting	bird	No	No	Yes	3	2008	1990
<i>Emberiza citrinella</i>	Yellowhammer	bird	No	No	Yes	15	2011	2000
<i>Emberiza schoeniclus</i>	Reed Bunting	bird	No	No	Yes	3	2011	2010
<i>Falco columbarius</i>	Merlin	bird	Yes	Yes	No	1	2011	2011
<i>Falco peregrinus</i>	Peregrine	bird	Yes	Yes	No	9	2015	2001
<i>Falco subbuteo</i>	Hobby	bird	No	Yes	No	17	2016	2001
<i>Falco tinnunculus</i>	Kestrel	bird	No	No	No	13	2017	1996
<i>Gallinago gallinago</i>	Snipe	bird	No	No	Yes	3	2003	2000
<i>Larus fuscus</i>	Lesser Black-backed Gull	bird	No	No	No	6	2018	2010
<i>Larus marinus</i>	Great Black-backed Gull	bird	No	No	No	1	2015	2015
<i>Linaria cannabina</i>	Linnet	bird	No	No	Yes	4	2002	2000
<i>Milvus milvus</i>	Red Kite	bird	Yes	Yes	No	8	2017	2003
<i>Motacilla cinerea</i>	Grey Wagtail	bird	No	No	No	4	2015	2007
<i>Motacilla flava</i>	Yellow Wagtail	bird	No	No	Yes	3	2018	2004
<i>Motacilla flava subsp. flavissima</i>	Yellow Wagtail	bird	No	No	Yes	3	2018	2010
<i>Muscicapa striata</i>	Spotted Flycatcher	bird	No	No	Yes	22	2005	2000
<i>Numenius arquata</i>	Curlew	bird	No	No	Yes	8	2012	2000
<i>Pandion haliaetus</i>	Osprey	bird	Yes	Yes	No	2	2016	2015
<i>Passer domesticus</i>	House Sparrow	bird	No	No	Yes	30	2018	2008
<i>Passer montanus</i>	Tree Sparrow	bird	No	No	Yes	84	2014	2000
<b>Scientific Name</b>	<b>Common Name</b>	<b>Informal Group</b>	<b>European Protection</b>	<b>UK Protection</b>	<b>Principle Concern</b>	<b>No. Of Recs.</b>	<b>Most Recent</b>	<b>First Known</b>
<i>Perdix perdix</i>	Grey Partridge	bird	No	No	Yes	35	2015	2000
<i>Phoenicurus ochruros</i>	Black Redstart	bird	No	Yes	No	2	2016	2016
<i>Phylloscopus trochilus</i>	Willow Warbler	bird	No	No	No	3	2012	2010
<i>Pluvialis apricaria</i>	Golden Plover	bird	Yes	No	No	3	2008	2003
<i>Prunella modularis</i>	Duncock	bird	No	No	Yes	36	2018	2007
<i>Pyrrhula pyrrhula</i>	Bullfinch	bird	No	No	Yes	3	2010	2000
<i>Saxicola rubetra</i>	Whinchat	bird	No	No	No	3	2012	2012
<i>Scolopax rusticola</i>	Woodcock	bird	No	No	No	2	2017	2017
<i>Strix aluco</i>	Tawny Owl	bird	No	No	No	6	2009	2002
<i>Sturnus vulgaris</i>	Starling	bird	No	No	Yes	27	2018	2008
<i>Tadorna tadorna</i>	Shelduck	bird	No	No	No	2	2015	2015
<i>Tringa nebulana</i>	Greenshank	bird	No	Yes	No	2	2001	2000
<i>Tringa ochropus</i>	Green Sandpiper	bird	No	Yes	No	21	2005	2002
<i>Turdus iliacus</i>	Redwing	bird	No	Yes	No	13	2018	2002
<i>Turdus philomelos</i>	Song Thrush	bird	No	No	Yes	29	2018	2007
<i>Turdus pilaris</i>	Fieldfare	bird	No	Yes	No	22	2018	2001
<i>Turdus viscivorus</i>	Mistle Thrush	bird	No	No	No	4	2015	2008
<i>Tyto alba</i>	Barn Owl	bird	No	Yes	Yes	7	2017	2002
<i>Vanellus vanellus</i>	Lapwing	bird	No	No	Yes	56	2018	1996
<i>Anthemis arvensis</i>	Corn Chamomile	flowering plant	No	No	No	1	2007	2007
<i>Bromus secalinus</i>	Rye Brome	flowering plant	No	No	No	1	2007	2007
<i>Filago vulgaris</i>	Common Cudweed	flowering plant	No	No	No	2	2007	1999
<i>Hyacinthoides non-scripta</i>	Bluebell	flowering plant	No	Yes	No	3	2009	1996
<i>Papaver argemone</i>	Prickly Poppy	flowering plant	No	No	No	1	2007	2007
<i>Polemonium caeruleum</i>	Jacob's-ladder	flowering plant	No	No	No	1	2007	2007
<i>Viola tricolor</i>	Wild Pansy	flowering plant	No	No	No	1	2001	2001
<b>Scientific Name</b>	<b>Common Name</b>	<b>Informal Group</b>	<b>European Protection</b>	<b>UK Protection</b>	<b>Principle Concern</b>	<b>No. Of Recs.</b>	<b>Most Recent</b>	<b>First Known</b>
<i>Anicola amphibius</i>	European Water Vole	mammal	No	Yes	Yes	3	1998	1997
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	No	No	Yes	25	2016	1982
<i>Lepus europaeus</i>	Brown Hare	mammal	No	No	Yes	22	2017	1998
<i>Lutra lutra</i>	European Otter	mammal	Yes	Yes	Yes	11	2018	1996
<i>Meles meles</i>	Eurasian Badger	mammal	No	Yes	No	74	2017	0
<i>Mustela putorius</i>	Polecat	mammal	No	Yes	Yes	7	2015	2002
<i>Mustela putorius subsp. furo</i>	Feral Ferret	mammal	No	Yes	Yes	1	2004	2004
<i>Chiroptera</i>	Bats	mammal - bat	Yes	Yes	Yes	4	2004	1989
<i>Myotis</i>	unidentified Myotis bat	mammal - bat	Yes	Yes	Yes	8	2017	2017
<i>Myotis daubentonii</i>	Daubenton's Bat	mammal - bat	Yes	Yes	No	5	2017	2010
<i>Myotis nattereri</i>	Natterer's Bat	mammal - bat	Yes	Yes	No	1	2007	2007
<i>Nyctalus noctula</i>	Noctule Bat	mammal - bat	Yes	Yes	Yes	5	2017	2017
<i>Pipistrellus</i>	Pipistrelle Bat species	mammal - bat	Yes	Yes	Yes	12	2017	2017
<i>Pipistrellus pipistrellus sensu lato</i>	Pipistrelle	mammal - bat	Yes	Yes	Yes	17	2010	1983
<i>Pipistrellus pipistrellus sensu stricto</i>	Common Pipistrelle	mammal - bat	Yes	Yes	Yes	46	2017	2006
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	mammal - bat	Yes	Yes	Yes	5	2017	2009
<i>Plecotus auritus</i>	Brown Long-eared Bat	mammal - bat	Yes	Yes	Yes	2	2010	1997

Scientific Name	Common Name	Informal Group	European Protection	UK Protection	Principle Concern	No. Of Recs.	Most Recent	First Known
Saturnia w-album	White-letter Hairstreak	insect - butterfly	No	No	Yes	2	2009	2009
Andrena cineraria	Ashy Mining Bee	insect - hymenopteran	No	No	Yes	2	2017	2017
Andrena flavipes	Yellow-legged Mining Bee	insect - hymenopteran	No	No	Yes	3	2017	2017
Andrena fulva	Tawny Mining Bee	insect - hymenopteran	No	No	Yes	13	2018	2009
Andrena haemorrhoa	Orange-tailed Mining Bee	insect - hymenopteran	No	No	Yes	14	2018	2009
Andrena nigroaenea	Buffish Mining Bee	insect - hymenopteran	No	No	Yes	1	2017	2017
Andrena scotica	Chocolate Mining Bee	insect - hymenopteran	No	No	Yes	1	2017	2017
Anthophora plumipes	Hairy-footed Flower Bee	insect - hymenopteran	No	No	Yes	9	2018	2017
Apis mellifera	Western Honey Bee	insect - hymenopteran	No	No	Yes	3	2018	2017
Bombus hortorum	Small Garden Bumble Bee	insect - hymenopteran	No	No	Yes	1	2017	2017
Bombus hypnorum	Tree Bumblebee	insect - hymenopteran	No	No	Yes	3	2017	2017
Bombus lapidarius	Large Red Tailed Bumble Bee	insect - hymenopteran	No	No	Yes	5	2018	2008
Bombus lucorum	White-Tailed Bumble Bee	insect - hymenopteran	No	No	Yes	2	2009	2009
Bombus pascuorum	Common Carder Bee	insect - hymenopteran	No	No	Yes	3	2017	2009
Bombus pratorum	Early Bumble Bee	insect - hymenopteran	No	No	Yes	1	2009	2009
Bombus terrestris	Buff-Tailed Bumble Bee	insect - hymenopteran	No	No	Yes	7	2018	2009
Megachile ligniseca	Wood-carving Leafcutter Bee	insect - hymenopteran	No	No	Yes	2	2017	2017
Nomada goodeniana	Gooden's Nomad Bee	insect - hymenopteran	No	No	Yes	4	2017	2017
Nomada marshamella	Marsham's Nomad Bee	insect - hymenopteran	No	No	Yes	1	2017	2017
Nomada ruficornis	Fork-jawed Nomad Bee	insect - hymenopteran	No	No	Yes	3	2017	2017
Vespa crabro	Hornet	insect - hymenopteran	No	No	Yes	3	2016	2006
Vespula germanica	German Wasp	insect - hymenopteran	No	No	Yes	1	2008	2008
Vespula vulgaris	Common Wasp	insect - hymenopteran	No	No	Yes	4	2017	2017
Acronicta psi	Grey Dagger	insect - moth	No	No	Yes	8	2007	2000
Acronicta rumicis	Knot Grass	insect - moth	No	No	Yes	3	2018	2015
Agrochola litura	Brown-spot Pinion	insect - moth	No	No	Yes	23	2015	2000
Agrochola lychnidis	Beaded Chestnut	insect - moth	No	No	Yes	88	2018	2000
Allophyes oxyacanthae	Green-brindled Crescent	insect - moth	No	No	Yes	74	2018	2000
Amphipoea oculea	Ear Moth	insect - moth	No	No	Yes	2	2001	2001
Amphipyra tragopoginis	Mouse Moth	insect - moth	No	No	Yes	196	2018	2000
Apamea remissa	Dusky Brocade	insect - moth	No	No	Yes	18	2010	2000
Aporophylla lutulenta	Deep-brown Dart	insect - moth	No	No	Yes	3	2006	2001
Arctia caja	Garden Tiger	insect - moth	No	No	Yes	9	2017	2000
Atethmia centrigo	Centre-barred Sallow	insect - moth	No	No	Yes	8	2018	2001
Caradrina morpheus	Mottled Rustic	insect - moth	No	No	Yes	164	2018	2000
Ceramica pisi	Broom Moth	insect - moth	No	No	Yes	6	2013	2001
Chesias legatella	Streak	insect - moth	No	No	Yes	1	2016	2016
Cirrhia icteritia	Sallow	insect - moth	No	No	Yes	3	2015	2002
Diarsia rubi	Small Square-spot	insect - moth	No	No	Yes	55	2017	2000
Diloba caeruleocephala	Figure of Eight	insect - moth	No	No	Yes	34	2013	2000
Eclipoptera silaceata	Small Phoenix	insect - moth	No	No	Yes	19	2018	2000
Ennomos erosaria	September Thorn	insect - moth	No	No	Yes	6	2002	2002
Ennomos fuscantaria	Dusky Thorn	insect - moth	No	No	Yes	18	2018	2000
Eugnorisma glareosa	Autumnal Rustic	insect - moth	No	No	Yes	3	2014	2000
Euxoa tritici	White-line Dart	insect - moth	No	No	Yes	2	2013	2000
Graphiphora augur	Double Dart	insect - moth	No	No	Yes	6	2006	2002
Hepialus humuli	Ghost Moth	insect - moth	No	No	Yes	16	2018	2001
Hoplodrina blanda	Rustic	insect - moth	No	No	Yes	145	2018	2000
Hydraecia micacea	Rosy Rustic	insect - moth	No	No	Yes	42	2017	2000
Leucania comma	Shoulder-striped Wainscot	insect - moth	No	No	Yes	1	2017	2017
Litologia literosa	Rosy Minor	insect - moth	No	No	Yes	7	2001	2000
Lycia hirtaria	Brindled Beauty	insect - moth	No	No	Yes	14	2015	2000
Melanchna persicariae	Dot Moth	insect - moth	No	No	Yes	16	2014	2000
Orthosia gracilis	Powdered Quaker	insect - moth	No	No	Yes	1	2014	2014
Scotopteryx chenopodiata	Shaded Broad-bar	insect - moth	No	No	Yes	24	2018	2004
Spilosoma lubricipeda	White Ermine	insect - moth	No	No	Yes	115	2018	2000
Spilosoma lutea	Buff Ermine	insect - moth	No	No	Yes	184	2018	2000
Tholera decimalis	Feathered Gothic	insect - moth	No	No	Yes	1	2013	2013
Timandra comae	Blood-vein	insect - moth	No	No	Yes	23	2018	2000
Trichiura crataegi	Pale Eggar	insect - moth	No	No	Yes	5	2004	2000
Tyria jacobaeae	Cinnabar	insect - moth	No	No	Yes	6	2017	2009
Watsonalla binaria	Oak Hook-tip	insect - moth	No	No	Yes	16	2018	2000
Xanthorhoe ferrugata	Dark-barred Twin-spot Carpet	insect - moth	No	No	Yes	71	2018	2000

## White clawed rayfish records

Austropotamobius pallipes	White-clawed Freshwater Crayfish	crustacean	SJ932189	09/01/1995
Austropotamobius pallipes	White-clawed Freshwater Crayfish	crustacean	SJ932189	12/07/1993
Austropotamobius pallipes	White-clawed Freshwater Crayfish	crustacean	SJ932189	21/11/1991
Austropotamobius pallipes	White-clawed Freshwater Crayfish	crustacean	SJ932189	23/03/1994
Austropotamobius pallipes	White-clawed Freshwater Crayfish	crustacean	SJ932189	29/11/1995
Austropotamobius pallipes	White-clawed Freshwater Crayfish	crustacean	SJ935176	29/09/1995



## Detailed mammal records

<i>Arvicola amphibius</i>	European Water Vole	mammal	SJ938166	18/03/1997
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ9216	03/06/2003
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ9217	02/09/2004
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ9217	03/06/1982
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ9217	03/06/2009
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ9217	14/09/2010
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ9217	14/09/2011
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ9217	22/04/2003
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ922155	12/04/2002
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ927180	11/09/2015
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ928177	17/07/2009
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ928179	21/06/2011
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ9315	29/09/2014
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ9316	01/08/2011
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ9316	06/07/2003
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ9317	05/03/2014
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ936183	Summer 2009
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ93761852	01/07/2010
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ93761852	17/06/2010
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ93761852	19/07/2006
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ93761852	23/06/2008
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ93761852	23/06/2009
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ93761852	23/07/2009
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ93761852	24/06/2010
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	SJ938185	14/04/2016
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ9017	July 2002
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ906184	03/05/2004
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ910176	13/06/2005
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ9118	02/06/2007
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ914175	12/08/2003
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ920175	24/02/1999
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ9215	01/03/2004
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ9215	19/02/1998
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ9217	17/07/2004
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ922155	05/04/2001
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ922155	29/01/2001
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ926193	01/03/2004
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ928168	08/10/1998
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ9315	June 2008
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ9316	06/12/2006
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ934189	18/05/2017
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ93751860	23/03/2011
<i>Lepus europaeus</i>	Brown Hare	mammal	SJ938184	16/04/2013
<i>Lutra lutra</i>	European Otter	mammal	SJ9315	11/11/2004
<i>Lutra lutra</i>	European Otter	mammal	SJ93291765	17/01/2001
<i>Lutra lutra</i>	European Otter	mammal	SJ93311569	11/04/2014
<i>Lutra lutra</i>	European Otter	mammal	SJ933158	21/06/2006
<i>Lutra lutra</i>	European Otter	mammal	SJ933158	23/07/1996
<i>Lutra lutra</i>	European Otter	mammal	SJ935176	06/03/2010
<i>Lutra lutra</i>	European Otter	mammal	SJ93521773	17/01/2001
<i>Lutra lutra</i>	European Otter	mammal	SJ937160	01/02/2018
<i>Lutra lutra</i>	European Otter	mammal	SJ938161	29/01/2018
<i>Mustela putorius</i>	Polecat	mammal	SJ9217	02/09/2011
<i>Mustela putorius</i>	Polecat	mammal	SJ9217	29/01/2002
<i>Mustela putorius</i>	Polecat	mammal	SJ928169	10/11/2007
<i>Mustela putorius</i>	Polecat	mammal	SJ9317	26/09/2010
<i>Mustela putorius</i>	Polecat	mammal	SJ9317	26/10/2010
<i>Mustela putorius</i>	Polecat	mammal	SJ939170	18/09/2003
<i>Mustela putorius subsp. furo</i>	Feral Ferret	mammal	SJ9215	06/07/2004

## Detailed great crested newt records

Triturus cristatus	Great Crested Newt	amphibian	SJ92051941	2015
Triturus cristatus	Great Crested Newt	amphibian	SJ924161	07/05/2014
Triturus cristatus	Great Crested Newt	amphibian	SJ924161	09/04/2014
Triturus cristatus	Great Crested Newt	amphibian	SJ924161	14/05/2014
Triturus cristatus	Great Crested Newt	amphibian	SJ924161	15/04/2014
Triturus cristatus	Great Crested Newt	amphibian	SJ924161	23/04/2014
Triturus cristatus	Great Crested Newt	amphibian	SJ924161	29/04/2014
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	04/05/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	04/05/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	04/05/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	11/05/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	11/05/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	11/05/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	12/04/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	12/04/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	12/04/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	18/04/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	18/04/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	25/05/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	25/05/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	30/05/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ93251588	30/05/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ9325615893	04/05/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ9325615893	11/05/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ9325615893	12/04/2016
Triturus cristatus	Great Crested Newt	amphibian	SJ9325615893	18/04/2016

## Detailed badger records

Scientific Name	Common Name	Location	Date	Source	Record Type	Dist. from Site (m)
Meles meles	Eurasian Badger	A449 (road corridor)	01/07/2005	Staffordshire Mammal Group (3tw/9r6)	Not specified	1964
Meles meles	Eurasian Badger	A449 (road corridor)	09/04/2004	Staffordshire Mammal Group (3tw/9r6)	Not specified	1964
Meles meles	Eurasian Badger	A449 (road corridor)	05/10/2012	Staffordshire Mammal Group (3tw/9r6)	Not specified	968
Meles meles	Eurasian Badger	A449 (road corridor)	07/07/2003	Staffordshire Mammal Group (3tw/9r6)	Not specified	968
Meles meles	Eurasian Badger	A449 (road corridor)	10/09/2001	Staffordshire Mammal Group (3tw/9r6)	Not specified	968
Meles meles	Eurasian Badger	A449 (road corridor)	26/02/2002	Staffordshire Mammal Group (3tw/9r6)	Not specified	968
Meles meles	Eurasian Badger	A449 (road corridor)	05/05/2005	Staffordshire Mammal Group (3tw/9r6)	Not specified	120
Meles meles	Eurasian Badger	Rodbaston College (overview)	06/06/2002	Staffordshire Mammal Group (3tw/9r6)	Not specified	1915
Meles meles	Eurasian Badger	Rodbaston College (overview)	28/01/2002	Staffordshire Mammal Group (3tw/9r6)	Not specified	1915
Meles meles	Eurasian Badger	Rodbaston College (overview)	April 2001	Staffordshire Mammal Group (3tw/9r6)	Not specified	1915
Meles meles	Eurasian Badger	Honey Pots	~ 2000	Staffordshire Badger Group	burrow/nesthole, occupied	1619
Meles meles	Eurasian Badger	Sensitive. Lat long is approximate.	15/02/2017	iRecord	Not specified	1099
Meles meles	Eurasian Badger	A449 (road corridor)	21/02/2009	Staffordshire Mammal Group (3tw/9r6)	Not specified	1731
Meles meles	Eurasian Badger	Dunston Parish	02/04/2009	Staffordshire Mammal Group (3tw/9r6)	Not specified	554
Meles meles	Eurasian Badger	Dunston Parish	~ 2000	Staffordshire Badger Group	Not specified	364
Meles meles	Eurasian Badger	A449 (road corridor)	06/09/2014	Staffordshire Mammal Group (3tw/9r6)	Not specified	691
Meles meles	Eurasian Badger	A449 (road corridor)	10/03/2009	Staffordshire Mammal Group (3tw/9r6)	Not specified	691
Meles meles	Eurasian Badger	A449 (road corridor)	22/08/2011	Staffordshire Mammal Group (3tw/9r6)	Not specified	691
Meles meles	Eurasian Badger	A449 (road corridor)	27/02/2009	Staffordshire Mammal Group (3tw/9r6)	Not specified	691
Meles meles	Eurasian Badger	A449 (road corridor)	28/03/2009	Staffordshire Mammal Group (3tw/9r6)	Not specified	691
Meles meles	Eurasian Badger	A449 (road corridor)	28/02/2017	Staffordshire Badger Group	Not specified	1052
Meles meles	Eurasian Badger	A449 (road corridor)	14/10/2008	Staffordshire County Council	Not specified	1413
Meles meles	Eurasian Badger	A449 (road corridor)	08/06/2006	Staffordshire Mammal Group (3tw/9r6)	Not specified	767
Meles meles	Eurasian Badger	A449 (road corridor)	26/02/2007	Staffordshire Mammal Group (3tw/9r6)	Not specified	767
Meles meles	Eurasian Badger	A449 (road corridor)	31/07/2006	Staffordshire Mammal Group (3tw/9r6)	Not specified	767
Meles meles	Eurasian Badger	Dunston Parish	18/10/2013	Staffordshire County Council	Dead	509
Meles meles	Eurasian Badger	A449 (road corridor)	26/02/2007	SER Badger Records	Not specified	463
Meles meles	Eurasian Badger	A449 (road corridor)	06/07/2011	Staffordshire Badger Group	Dead	545
Meles meles	Eurasian Badger	A449 (road corridor)	07/03/2011	Staffordshire Badger Group	Dead	545
Meles meles	Eurasian Badger	A449 (road corridor)	09/06/2015	Staffordshire County Council	dead on road	545
Meles meles	Eurasian Badger	A449 (road corridor)	18/03/2013	Staffordshire County Council	Not specified	1557
Meles meles	Eurasian Badger	Mill Lane, Acton Trussell	13/10/2005	Staffordshire Badger Group (3kn)	Not specified	1749
Meles meles	Eurasian Badger	Mill Lane, Acton Trussell	14/10/2005	Staffordshire Badger Group (3kn)	Not specified	1749
Meles meles	Eurasian Badger	Land at Acton Gate	11/02/2015	Consultants (SES)	Not specified	1494
Meles meles	Eurasian Badger	A449 (road corridor)	02/03/2007	SER Badger Records	Not specified	549
Meles meles	Eurasian Badger	Lower Drayton Lane, Penkridge	19/06/2006	SER Badger Records	Not specified	2254
Meles meles	Eurasian Badger	A449 (road corridor)	09/03/2010	Staffordshire Mammal Group (3tw/9r6)	Not specified	1469
Meles meles	Eurasian Badger	A449 (road corridor)	23/02/2004	Staffordshire Mammal Group (3tw/9r6)	Not specified	1469
Meles meles	Eurasian Badger	Acton Trussell and Bednall Parish	03/07/2007	Staffordshire Mammal Group (3tw/9r6)	Not specified	1520
Meles meles	Eurasian Badger	Acton Hill Road	11/10/2002	Staffordshire Badger Group	dead on road	1520



Meles meles	Eurasian Badger	M6 (road corridor)	31/08/2004	Staffordshire Mammal Group (3tw/9r6)	Not specified	1520
Meles meles	Eurasian Badger	Penkridge Parish	15/02/2000	Staffordshire Mammal Group (3tw/9r6)	Not specified	2320
Meles meles	Eurasian Badger	M6 (road corridor)	08/10/2009	Consultants (EL)	Not specified	1396
Meles meles	Eurasian Badger	M6 (road corridor)	- 2000	Staffordshire Badger Group	burrow/nesthole, occupied	1325
Meles meles	Eurasian Badger	South Staffordshire District	- 2000	Staffordshire Badger Group	burrow/nesthole, occupied	1847
Meles meles	Eurasian Badger	Acton Trussell and Bednall Parish	2007	SER General Records 2007	Not specified	1237
Meles meles	Eurasian Badger	Acton Trussell and Bednall Parish	2007	SER General Records 2007	Not specified	1264
Meles meles	Eurasian Badger	Penkridge Sewage Works	- 2000	Staffordshire Badger Group	burrow/nesthole, occupied	1678
Meles meles	Eurasian Badger	Acton Trussell and Bednall Parish	- 2000	Staffordshire Badger Group	burrow/nesthole, occupied	1460
Meles meles	Eurasian Badger	Acton Trussell and Bednall Parish	06/09/2011	Consultants (EvE)	Not specified	1463

## Detailed bat records

Chiroptera	Bats	mammal - bat	SJ910176	27/09/2004	Staffordshire Mammal Group (3tw/9r6)	2 Count of Adult
Chiroptera	Bats	mammal - bat	SJ9217	21/06/1989	Natural England Files	
Chiroptera	Bats	mammal - bat	SJ922155	10/04/1997	Staffordshire Mammal Group	3 Count of Roost (possible)
Chiroptera	Bats	mammal - bat	SJ937175	20/05/1997	Staffordshire Mammal Group	Present Count of Roosting
Myotis	unidentified Myotis bat	mammal - bat	SJ9362018373	09/08/2017	Staffordshire County Council	
Myotis daubentonii	Daubenton's Bat	mammal - bat	SJ936173	10/08/2010	National Bat Monitoring Programme	27 Count
Myotis daubentonii	Daubenton's Bat	mammal - bat	SJ936173	15/08/2011	National Bat Monitoring Programme	22 Count
Myotis daubentonii	Daubenton's Bat	mammal - bat	SJ936173	18/08/2010	National Bat Monitoring Programme	22 Count
Myotis daubentonii	Daubenton's Bat	mammal - bat	SJ936173	30/08/2011	National Bat Monitoring Programme	14 Count
Myotis daubentonii	Daubenton's Bat	mammal - bat	SJ9362018373	09/08/2017	Consultants (TE)	1 Count of In Flight
Nyctalus noctula	Noctule Bat	mammal - bat	SJ9362018373	09/08/2017	Staffordshire County Council	
Nyctalus noctula	Noctule Bat	mammal - bat	SJ9362018373	09/08/2017	Consultants (TE)	1 Count of In Flight
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ922155	01/05/1997	Staffordshire Mammal Group	2 Count
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ922155	12/06/1997	Staffordshire Mammal Group	1 Count
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ922155	17/04/1997	Staffordshire Mammal Group	7 Count
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ922155	April 2001	Staffordshire Mammal Group (3tw/9r6)	1 Count of Adult
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ928176	31/08/2010	Staffordshire Bat Group (SER Records)	
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ9318	11/08/1984	Staffordshire Bat Group (SER Records)	218 Count of Nursery Colony
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ9318	22/07/1983	Staffordshire Bat Group (SER Records)	1 Count of Juvenile Female
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ9318	23/07/1983	Staffordshire Bat Group (SER Records)	1 Count of Juvenile Female; 1 Count of Dead
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ9318	30/07/1984	Staffordshire Bat Group (SER Records)	2 Count of Dead, 334 Count of Nursery Colony
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ9319	01/08/1996	Staffordshire Bat Group (SER Records)	1 Count of Juvenile Male
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ93521814	30/07/1996	Staffordshire Bat Group (SER Records)	
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ936182	03/08/1988	Staffordshire Bat Group (SER Records)	1 Count of Juvenile
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ937175	29/05/1997	Staffordshire Mammal Group	1 Count
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ93721809	25/07/1984	Staffordshire Bat Group (SER Records)	1 Count of Male; 1 Count of Dead; 1 Count of Roost (possible)
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ939182	12/07/2009	Staffordshire Bat Group (SER Records)	Infant and lactating Count of Adult Female
Pipistrellus pipistrellus sensu lato	Pipistrelle	mammal - bat	SJ939182	15/07/2008	Staffordshire Bat Group (SER Records)	
Pipistrellus pipistrellus sensu stricto	Common Pipistrelle	mammal - bat	SJ9215	06/07/2010	Staffordshire Mammal Group (3tw/9r6)	1 Count of Adult
Pipistrellus pipistrellus sensu stricto	Common Pipistrelle	mammal - bat	SJ9215	24/06/2006	Staffordshire Mammal Group (3tw/9r6)	1 Count of Adult
Pipistrellus pipistrellus sensu stricto	Common Pipistrelle	mammal - bat	SJ9216	06/07/2010	Staffordshire Mammal Group (3tw/9r6)	1 Count of Adult
Pipistrellus pipistrellus sensu stricto	Common Pipistrelle	mammal - bat	SJ9217	06/07/2010	Staffordshire Mammal Group (3tw/9r6)	1 Count of Adult
Pipistrellus pipistrellus sensu stricto	Common Pipistrelle	mammal - bat	SJ9217	24/06/2006	Staffordshire Mammal Group (3tw/9r6)	1 Count of Adult
Pipistrellus pipistrellus sensu stricto	Common Pipistrelle	mammal - bat	SJ9219	06/07/2010	Staffordshire Mammal Group (3tw/9r6)	1 Count of Adult
Pipistrellus pipistrellus sensu stricto	Common Pipistrelle	mammal - bat	SJ9219	24/06/2006	Staffordshire Mammal Group (3tw/9r6)	1 Count of Adult
Pipistrellus pipistrellus sensu stricto	Common Pipistrelle	mammal - bat	SJ9316	06/07/2010	Staffordshire Mammal Group (3tw/9r6)	1 Count of Adult
Pipistrellus pipistrellus sensu stricto	Common Pipistrelle	mammal - bat	SJ9316	24/06/2006	Staffordshire Mammal Group (3tw/9r6)	1 Count of Adult
Pipistrellus pipistrellus sensu stricto	Common Pipistrelle	mammal - bat	SJ9362018373	09/08/2017	Staffordshire County Council	
Pipistrellus pipistrellus sensu stricto	Common Pipistrelle	mammal - bat	SJ9362018373	09/08/2017	Consultants (TE)	1 Count of In Flight
Pipistrellus pygmaeus	Soprano Pipistrelle	mammal - bat	SJ9362018373	09/08/2017	Staffordshire County Council	
Pipistrellus pygmaeus	Soprano Pipistrelle	mammal - bat	SJ9362018373	09/08/2017	Consultants (TE)	1 Count of In Flight
Pipistrellus pygmaeus	Soprano Pipistrelle	mammal - bat	SJ93761852	02/04/2017	County Recorders (SMP)	1 Count of Adult
Pipistrellus pygmaeus	Soprano Pipistrelle	mammal - bat	SJ93761852	19/04/2009	County Recorders (SMP)	1 Count of Adult
Pipistrellus pygmaeus	Soprano Pipistrelle	mammal - bat	SJ939182	16/08/2009	Staffordshire Bat Group (SER Records)	1 Count of Juvenile
Plecotus auritus	Brown Long-eared Bat	mammal - bat	SJ937175	29/05/1997	Staffordshire Mammal Group	1 Count
Plecotus auritus	Brown Long-eared Bat	mammal - bat	SJ939177	01/06/2010	Consultants (SES)	1 Count

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### EPS Licences within 1km of the Site

*Source: Magic Maps*

There are no EPS licences shown on Magic Maps within 1km of the site.

Note: The EPS licence database on Magic Maps is not fully up to date and more recent EPS licences may have been issued which are not shown.



## Local BAP Habitats and Species

### Staffordshire Biodiversity Action Plan (BAP)

#### **Mammals**

Brown Hare (*Lepus europaeus*)

Noctule Bat (*Nyctalus noctule*)

Otter (*Lutra lutra*)

Pipistrelle Bat (*Pipistrellus pipistrellus* and *P. pygmaeus*)

Water Vole (*Arvicola terrestris*)

#### **Birds**

Barn Owl (*Tyto alba*)

Farmland Seed-eating Birds

Grey Partridge (*Perdix perdix*)

Lapwing (*Vanellus vanellus*)

Nightjar (*Caprimulgus europaeus*)

Skylark (*Alauda arvensis*)

Snipe (*Gallinago gallinago*)

Woodlark (*Lullula arborea*)

#### **Reptiles, Amphibians and Fish**

Atlantic Salmon (*Salmo salar*)

Grass Snake (*Natrix natrix*)

Great Crested Newt (*Triturus cristatus*)

Natterjack Toad (*Bufo calamita*)

#### **Invertebrates**

Bog bush-cricket (*Metriopectera brachyptera*)

Ground Nesting Solitary Bees and Wasps

Small Pearl-bordered Fritillary (*Boloria selene*)

White-faced Darter (*Leucorrhinia dubia*)

White-clawed Crayfish (*Austropotamobius pallipes*)

#### **Plants and Fungi**

Dyer's Greenweed (*Genista tinctoria*)

Hybrid Bilberry (*Vaccinium x intermedium*)

Floating Water-plantain (*Luronium natans*)

Grass Wrack Pondweed (*Potamogeton compressus*)

Native Black Poplar (*Populus nigra* var. *betulifolia*)

Pink Meadow Cap (*Hygrocybe calyptraeformis*)

## **APPENDIX B: Target Notes Report 7960.003**

# Target Notes Report

Survey 7960.003

High level Phase 1

## Target Note TN1

Broadleaved woodland, probably plantation due to name (Cockpit Plantation) and species composition (common lime, sycamore, larch). Mostly semi-mature trees with negligible bat potential, some with thick ivy lattice with some bat roosting potential. Badger sett potential with rabbit burrows present. Some standing and fallen deadwood. Undulating topography with lower lying wet areas.

<i>Tilia x europaea</i>	Common Lime	D
<i>Acer pseudoplatanus</i>	Sycamore	A
<i>Hedera helix</i>	Ivy	A
<i>Ulmus glabra</i>	Wych Elm	A
<i>Urtica dioica</i>	Nettle	A
Moss sp.	Moss species	F
<i>Rubus fruticosus</i> agg.	Bramble	F
<i>Larix</i> sp.	Larch species	O
<i>Pteridium aquilinum</i>	Bracken	O
<i>Sambucus nigra</i>	Elder	O
<i>Silene dioica</i>	Red Campion	O
<i>Betula pubescens</i>	Downy Birch	R
<i>Dryopteris filix-mas</i>	Male-fern	R
<i>Fagus sylvatica</i>	Beech	R
<i>Geum urbanum</i>	Wood Avens	R
<i>Quercus</i> sp.	Oak species	R

## Target Note TN2

Shallow-looking woodland pond.

<i>Lemna minor</i>	Common Duckweed	D
<i>Typha latifolia</i>	Greater Reedmace	A

## Target Note TN3

Slow-flowing turbid river with grassy/tall ruderal herb banks. Suitability for otter and water vole.

<i>Urtica dioica</i>	Nettle	F
<i>Phalaris arundinacea</i>	Reed Canary-grass	O

## Target Note TN4

Small copse of mature trees with scattered scrub, unmanaged semi-improved grassland and tall ruderal herb beneath. Lots of fallen deadwood. Low bat roosting potential.

<i>Acer pseudoplatanus</i>	Sycamore	D
<i>Urtica dioica</i>	Nettle	A
<i>Crataegus monogyna</i>	Hawthorn	O
<i>Quercus cerris</i>	Turkey Oak	R
<i>Salix fragilis</i>	Crack Willow	R

## Target Note TN5

Semi-improved grassland meadow, very wet in places.

<i>Lolium perenne</i>	Perennial Ryegrass	D
<i>Poa annua</i>	Annual Meadow-grass	F
<i>Cirsium arvense</i>	Creeping Thistle	O
<i>Cirsium vulgare</i>	Spear Thistle	O
<i>Rumex obtusifolius</i>	Broad-leaved Dock	O
<i>Stellaria media</i>	Chickweed	O

KEY - D = Dominant, A = Abundant, F = Frequent, O = Occasional, R = Rare



<i>Urtica dioica</i>	Nettle	O
<i>Geranium molle</i>	Dove's-foot Cranesbill	R

### Target Note TN6

Large waterlogged meadow with tufted hair grass.

<i>Lolium perenne</i>	Perennial Ryegrass	D
<i>Agrostis stolonifera</i>	Creeping Bent	F
<i>Holcus lanatus</i>	Yorkshire-fog	F
<i>Ranunculus repens</i>	Creeping Buttercup	F
<i>Cirsium arvense</i>	Creeping Thistle	O
<i>Festuca rubra</i>	Red Fescue	O

### Target Note TN7

Heavily grazed semi-improved grassland field on slope.

<i>Lolium perenne</i>	Perennial Ryegrass	D
<i>Festuca rubra</i>	Red Fescue	O
<i>Holcus lanatus</i>	Yorkshire-fog	O
<i>Ranunculus repens</i>	Creeping Buttercup	O
<i>Cirsium vulgare</i>	Spear Thistle	R
<i>Taraxacum officinale agg.</i>	Dandelion	R
<i>Trifolium repens</i>	White Clover	R
<i>Urtica dioica</i>	Nettle	R

### Target Note TN8

Species-poor hedgerow along road, closely trimmed and managed. Rabbit burrows along. Numerous fungi species at base.

<i>Acer pseudoplatanus</i>	Sycamore	D
<i>Crataegus monogyna</i>	Hawthorn	D
<i>Galium aparine</i>	Cleavers	F
<i>Hedera helix</i>	Ivy	F
<i>Urtica dioica</i>	Nettle	F
<i>Rubus fruticosus agg.</i>	Bramble	O
<i>Rosa canina agg.</i>	Dog Rose	R
<i>Sambucus nigra</i>	Elder	R

### Target Note TN9

Group of ~14 mature lime and sycamore trees. Range between negligible and high bat potential. Semi-improved grassland and bare ground with much fallen deadwood and numerous rabbit burrows beneath.

### Target Note TN10

Wide wet ditch and flooded area with areas of open water. Tufted hairgrass, soft rush and large sedge species dominant. Will need botanical survey in appropriate season. Water vole potential.

<i>Deschampsia cespitosa</i>	Tufted Hair-grass	D
<i>Juncus effusus</i>	Soft Rush	A
<i>Urtica dioica</i>	Nettle	A
<i>Glyceria maxima</i>	Reed Sweet-grass	F
<i>Cardamine pratensis</i>	Cuckooflower	O
<i>Carex sp.</i>	Sedge species	O
<i>Phalaris arundinacea</i>	Reed Canary-grass	O
<i>Crataegus monogyna</i>	Hawthorn	R
<i>Rumex crispus</i>	Curled Dock	R

### Target Note TN11

Small pond in dip surrounded by tall ruderal herb with adjacent trees and scrub.

KEY - D = Dominant, A = Abundant, F = Frequent, O = Occasional, R = Rare

<i>Urtica dioica</i>	Nettle	D
<i>Epilobium hirsutum</i>	Great Willowherb	A
<i>Ulmus glabra</i>	Wych Elm	F

### Target Note TN12

Intact hedgerow.

<i>Crataegus monogyna</i>	Hawthorn	A
<i>Prunus spinosa</i>	Blackthorn	A
<i>Urtica dioica</i>	Nettle	A
<i>Rubus fruticosus agg.</i>	Bramble	F
<i>Rosa canina agg.</i>	Dog Rose	O
<i>Sambucus nigra</i>	Elder	O

### Target Note TN13

Species-rich intact hedge along bank with rabbit burrows.

<i>Crataegus monogyna</i>	Hawthorn	D
<i>Hedera helix</i>	Ivy	A
<i>Urtica dioica</i>	Nettle	A
<i>Galium aparine</i>	Cleavers	F
<i>Holcus lanatus</i>	Yorkshire-fog	F
<i>Fraxinus excelsior</i>	Ash	O
<i>Lamium album</i>	White Dead-nettle	O
<i>Prunus spinosa</i>	Blackthorn	O
<i>Quercus robur</i>	English Oak	O
<i>Rosa canina agg.</i>	Dog Rose	O
<i>Rubus fruticosus agg.</i>	Bramble	O
<i>Sambucus nigra</i>	Elder	O
<i>Stellaria media</i>	Chickweed	O
<i>Corylus avellana</i>	Hazel	R
<i>Ilex aquifolium</i>	Holly	R
<i>Lonicera periclymenum</i>	Honeysuckle	R
<i>Tamus communis</i>	Black Bryony	R

### Target Note TN14

Species rich hedge.

<i>Crataegus monogyna</i>	Hawthorn	A
<i>Corylus avellana</i>	Hazel	F
<i>Prunus spinosa</i>	Blackthorn	F
<i>Quercus robur</i>	English Oak	O
<i>Sambucus nigra</i>	Elder	O
<i>Ilex aquifolium</i>	Holly	R

### Target Note TN15

Semi improved grassland fields.

<i>Lolium perenne</i>	Perennial Ryegrass	D
<i>Holcus lanatus</i>	Yorkshire-fog	O
<i>Taraxacum officinale agg.</i>	Dandelion	O
<i>Urtica dioica</i>	Nettle	O

### Target Note TN16

Species rich hedge with ditch.

<i>Corylus avellana</i>	Hazel	F
<i>Crataegus monogyna</i>	Hawthorn	F
<i>Prunus spinosa</i>	Blackthorn	F
<i>Fraxinus excelsior</i>	Ash	O
<i>Ilex aquifolium</i>	Holly	O

KEY - D = Dominant, A = Abundant, F = Frequent, O = Occasional, R = Rare

<i>Quercus robur</i>	English Oak	O
<i>Acer campestre</i>	Field Maple	R
<i>Cornus sanguinea</i>	Dogwood	R
<i>Tamus communis</i>	Black Bryony	R

### Target Note TN17

Fenced triangular pond with tall ruderal herb margins. No obvious water plants.

<i>Urtica dioica</i>	Nettle	D
<i>Rubus fruticosus agg.</i>	Bramble	F

### Target Note TN18

Fishing pond within amenity grassland field. Rushes and a low number of young - semi-mature birch trees surround the pond. Very little aquatic vegetation present. Regularly disturbed by fishermen.

<i>Juncus effusus</i>	Soft Rush	A
<i>Juncus inflexus</i>	Hard Rush	A
<i>Betula pendula</i>	Silver Birch	O
<i>Phragmites australis</i>	Reed	O

### Target Note TN19

Semi-improved unmanaged grassland.

<i>Arrhenatherum elatius</i>	False Oat-grass	D
<i>Holcus lanatus</i>	Yorkshire-fog	A
<i>Dactylis glomerata</i>	Cock's-foot	F
<i>Phleum pratense</i>	Timothy	F
<i>Galium aparine</i>	Cleavers	O
<i>Ranunculus repens</i>	Creeping Buttercup	O
<i>Stellaria media</i>	Chickweed	O
<i>Taraxacum officinale agg.</i>	Dandelion	O
<i>Urtica dioica</i>	Nettle	O
<i>Bromus hordeaceus</i>	Soft Brome	R
<i>Cirsium arvense</i>	Creeping Thistle	R
<i>Festuca rubra</i>	Red Fescue	R
<i>Plantago major</i>	Greater Plantain	R
<i>Rumex obtusifolius</i>	Broad-leaved Dock	R
<i>Sonchus asper</i>	Prickly Sow-thistle	R

### Target Note TN20

Strip of semi-mature alder carr along wet ditch/small stream. Includes trees with bat potential. Woodland continues around margins of shady pond with common duckweed.

<i>Alnus glutinosa</i>	Alder	D
<i>Urtica dioica</i>	Nettle	D
<i>Corylus avellana</i>	Hazel	O
<i>Fraxinus excelsior</i>	Ash	O
<i>Pinus sylvestris</i>	Scots Pine	O
<i>Quercus robur</i>	English Oak	O
<i>Salix fragilis</i>	Crack Willow	O
<i>Sambucus nigra</i>	Elder	O

### Target Note TN21

Shaded pond surrounded by semi-natural broadleaved woodland including some mature trees. Much standing and fallen deadwood.

<i>Hedera helix</i>	Ivy	D
<i>Urtica dioica</i>	Nettle	A
<i>Alnus glutinosa</i>	Alder	F
<i>Ulmus glabra</i>	Wych Elm	F
<i>Fraxinus excelsior</i>	Ash	O

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<i>Quercus robur</i>	English Oak	O
<i>Salix fragilis</i>	Crack Willow	O
<i>Ilex aquifolium</i>	Holly	R

### Target Note TN22

Clear and slow-flowing stream in deep cleft with fool's watercress. Grassy banks with water vole potential.

### Target Note T23

Amenity grassland field used as an all-year-round caravan and campsite site. The grass is regularly managed and kept to a short sward of <5cm. To the east is an area of semi-improved grassland, fenced off from the amenity - it appears unmanaged and has grown to 0.5m in places, with a richer species diversity including timothy and false oat-grass. The fields are surrounded by species rich native hedgerows of approximately 2m tall and 0.5m wide. Within the SI grassland field, a dry ditch 0.5m deep runs the length of the surrounding hedgerow.

<i>Lolium perenne</i>	Perennial Ryegrass	D
<i>Corylus avellana</i>	Hazel	A
<i>Crataegus monogyna</i>	Hawthorn	A
<i>Prunus spinosa</i>	Blackthorn	A
<i>Taraxacum officinale agg.</i>	Dandelion	A
<i>Jacobaea vulgaris</i>	Common Ragwort	F
<i>Phleum pratense</i>	Timothy	F
<i>Ranunculus repens</i>	Creeping Buttercup	F
<i>Rosa canina agg.</i>	Dog Rose	F
<i>Rumex obtusifolius</i>	Broad-leaved Dock	F
<i>Trifolium pratense</i>	Red Clover	F
<i>Trifolium repens</i>	White Clover	F
<i>Acer sp.</i>	Maple species	O
<i>Arrhenatherum elatius</i>	False Oat-grass	O
<i>Cerastium fontanum</i>	Common Mouse-ear	O
<i>Ilex aquifolium</i>	Holly	O

### Target Note TN24

To the south west of the amenity caravan park lies an area of bare ground and ephemeral vegetation. This area contains a disused building with features that would allow access within. Crevice spaces and lifted boards over the windows and doors present potential for roosting bats.

<i>Bellis perennis</i>	Daisy	F
<i>Epilobium sp.</i>	Willowherb species	F
<i>Moss sp.</i>	Moss species	F
<i>Taraxacum officinale agg.</i>	Dandelion	F
<i>Trifolium pratense</i>	Red Clover	F
<i>Urtica dioica</i>	Nettle	F
<i>Cirsium vulgare</i>	Spear Thistle	O
<i>Rumex obtusifolius</i>	Broad-leaved Dock	O

### Target Note TN25

A farm yard within the west parcel of site, containing large, open storage buildings as well as farm houses and brick buildings. The buildings are all built upon a hardstanding footprint. The brick buildings may present bat roost suitability.

### Target Note TN26

An area of semi-natural mixed woodland within the south of site. The woodland is dominated by oak and sycamore in the south and coniferous species in the north. The ground flora consisted of ferns, willowherb and bramble but could support diverse woodland flora earlier in the year. Evidence of badger foraging was identified during the habitat survey. A wet ditch runs along the north east border of the woodland, flowing towards School Lane.

KEY - D = Dominant, A = Abundant, F = Frequent, O = Occasional, R = Rare

<i>Quercus robur</i>	English Oak	D
<i>Acer pseudoplatanus</i>	Sycamore	A
<i>Epilobium sp.</i>	Willowherb species	A
<i>Ilex aquifolium</i>	Holly	A
<i>Larix sp.</i>	Larch species	F
<i>Pinus sp.</i>	Pine species	F
<i>Rubus fruticosus agg.</i>	Bramble	F
<i>Betula pendula</i>	Silver Birch	O
<i>Dryopteris dilatata</i>	Broad Buckler-fern	O

### Target Note TN27

A large ephemeral pool present within an arable field in the north of site, adjacent to School Lane. Vegetation present included the flooded grasses and crops that has been flooded. Appear to be temporary - presence may depend on seasons.

### Target Note TN28

Two ponds present within the north of the site's central parcel. The ponds are located within an intensely managed, improved grassland, sheep pasture. They are surrounded on all aspects by 8 mature oak trees. When water levels rise with heavy rainfall, the two ponds are close enough to form one large pond. Aquatic vegetation consisted of the surrounding nettle and grass species. Lots of leaf litter is present from the surrounding oak trees.

<i>Lolium perenne</i>	Perennial Ryegrass	A
<i>Quercus robur</i>	English Oak	A
<i>Urtica dioica</i>	Nettle	A

### Target Note TN29

Small area of scrubland that has become isolated from the rest of the improved grassland pasture by a stream running north to south through the field. Scrub has been able to develop into trees in this area with hawthorn and willow species present in the form of young trees.

<i>Crataegus monogyna</i>	Hawthorn	D
<i>Salix hybrid</i>	Willow hybrid	A
<i>Ilex aquifolium</i>	Holly	O
<i>Rubus fruticosus agg.</i>	Bramble	O

### Target Note TN30

Large pond within improved sheep pasture in the west of the central land parcel. Birch, willow and oak trees surround the pond, shading 70% of the water surface, with scrub species also surrounding all aspects.

<i>Salix species</i>	Willow species	A
<i>Urtica dioica</i>	Nettle	A
<i>Epilobium sp.</i>	Willowherb species	F
<i>Phragmites australis</i>	Reed	F
<i>Quercus robur</i>	English Oak	F
<i>Rubus fruticosus agg.</i>	Bramble	F
<i>Betula sp.</i>	Birch species	O

### Target Note TN31

Pond within the west of the central site parcel, between the A449 and the train line. A hedgerow borders the north of the pond and a large amount of scrub is encroaching the water. Saplings surround the pond edge and are present within the water. Vegetation growing within the ponds covers approximately 95% of the water surface.

<i>Alnus glutinosa</i>	Alder	F
<i>Betula sp.</i>	Birch species	F
<i>Phragmites australis</i>	Reed	F
<i>Rubus fruticosus agg.</i>	Bramble	F
<i>Rumex obtusifolius</i>	Broad-leaved Dock	F

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<i>Urtica dioica</i>	Nettle	F
<i>Juncus sp.</i>	Rush species	O
<i>Quercus robur</i>	English Oak	O

### Target Note TN32

Stream running north to south through improved pasture of the central land parcel. The stream has isolated a small section of pasture in the west from the rest of the improved field to the east.

The stream is approximately 1m wide and 0.25m deep.

The vegetation consists of the improved grassland species present beneath the stream. There are no earth banks present as the stream runs over the grassland field contours. A small amount of scrub is present in places adjacent to the stream.

<i>Lolium perenne</i>	Perennial Ryegrass	D
<i>Rumex obtusifolius</i>	Broad-leaved Dock	F
<i>Urtica dioica</i>	Nettle	F
<i>Taraxacum officinale agg.</i>	Dandelion	O
<i>Trifolium pratense</i>	Red Clover	O

### Target Note TN33

Semi-improved grassland within the south east of the central land parcel. The land appears previously grazed however currently supports no grazing stock and appears unmanaged, growing to a length of 20cm in places. The grassland has been fenced off into two parcels and may be used recreationally by private house owners south of the grassland on Swan Lane. A small pond is present adjacent to the northern hedgerow, scrub species are present surrounding the pond edge.

<i>Lolium perenne</i>	Perennial Ryegrass	D
<i>Dactylis glomerata</i>	Cock's-foot	A
<i>Arrhenatherum elatius</i>	False Oat-grass	F
<i>Epilobium sp.</i>	Willowherb species	F
<i>Ranunculus acris</i>	Meadow Buttercup	F
<i>Ranunculus repens</i>	Creeping Buttercup	F
<i>Rumex obtusifolius</i>	Broad-leaved Dock	F
<i>Trifolium pratense</i>	Red Clover	F
<i>Urtica dioica</i>	Nettle	O

### Target Note TN34

Farm yard at the junction of A449 and Swan Ln. Cow shelters and hay storage barns are present within the hardstanding footprint. A large, red brick farm house is also present which may present bat potential.

A small area of semi-improved grassland is present to the south east of the farm yard, which appears unmanaged and disused.

Scrub and a small conifer hedge is present to the west of the farms hardstanding.

<i>Ranunculus repens</i>	Creeping Buttercup	F
<i>Rubus fruticosus agg.</i>	Bramble	F
<i>Urtica dioica</i>	Nettle	F
<i>Achillea millefolium</i>	Yarrow	O
<i>Arrhenatherum elatius</i>	False Oat-grass	O
<i>Cerastium fontanum</i>	Common Mouse-ear	O
<i>Cirsium arvense</i>	Creeping Thistle	O
<i>Dactylis glomerata</i>	Cock's-foot	O
<i>Lapsana communis</i>	Nipplewort	O
<i>Lolium perenne</i>	Perennial Ryegrass	O
<i>Trifolium pratense</i>	Red Clover	O
<i>Trifolium repens</i>	White Clover	O
<i>Rumex obtusifolius</i>	Broad-leaved Dock	O

### Target Note TN35

Small refuse tip area, earth mounds and spoil piles present. Scrub species are beginning to colonise the spoil piles. A small strip of semi-improved grassland separates this area from the arable field to the west. A small pond is present to the east of the spoil piles, surrounding completely by dense scrub.

<i>Arrhenatherum elatius</i>	False Oat-grass	A
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<i>Crataegus monogyna</i>	Hawthorn	A
<i>Lolium perenne</i>	Perennial Ryegrass	A
<i>Cirsium arvense</i>	Creeping Thistle	F
<i>Galium aparine</i>	Cleavers	F
<i>Rumex obtusifolius</i>	Broad-leaved Dock	F
<i>Dipsacus fullonum</i>	Teasel	O
<i>Urtica dioica</i>	Nettle	O

### Target Note TN36

Species rich hedgerow and ditch with large trees. The wet ditch adjacent to the hedgerow runs from north to south through site.

Towards the south, the species rich hedgerow becomes dominated by mature trees, consisting of oak and alder.

The ditch is culverted for tractor access between fields.

<i>Prunus spinosa</i>	Blackthorn	D
<i>Crataegus monogyna</i>	Hawthorn	A
<i>Rosa canina agg.</i>	Dog Rose	F
<i>Rubus fruticosus agg.</i>	Bramble	F
<i>Urtica dioica</i>	Nettle	F
<i>Alnus glutinosa</i>	Alder	O
<i>Ilex aquifolium</i>	Holly	O
<i>Quercus robur</i>	English Oak	O

### Target Note TN37

Semi-improved grassland field within the north of the central land parcel. Adjacent to arable and improved pasture, this field is currently ungrazed. The grass has been able to grow to approximately 10cm. A large sycamore tree lies on the south border of the field and contains woodpecker holes within the main trunk.

<i>Lolium perenne</i>	Perennial Ryegrass	D
<i>Holcus lanatus</i>	Yorkshire-fog	A
<i>Dactylis glomerata</i>	Cock's-foot	F
<i>Ranunculus repens</i>	Creeping Buttercup	F
<i>Taraxacum officinale agg.</i>	Dandelion	F
<i>Acer pseudoplatanus</i>	Sycamore	O
<i>Achillea millefolium</i>	Yarrow	O
<i>Arrhenatherum elatius</i>	False Oat-grass	O
<i>Bellis perennis</i>	Daisy	O
<i>Jacobaea vulgaris</i>	Common Ragwort	O
<i>Trifolium pratense</i>	Red Clover	O

### Target Note TN38

Pond within the south west arable field of the central land parcel. The pond is surrounded by scrub and young trees on all aspects. No aquatic vegetation is present and the waters surface is 100% shaded from the surrounding scrub.

<i>Crataegus monogyna</i>	Hawthorn	D
<i>Rubus fruticosus agg.</i>	Bramble	A
<i>Urtica dioica</i>	Nettle	A

### Target Note TN39

Small pool formed within a depression along a wet ditch containing running water. The pond is surrounded on all aspects by dense scrub and trees and is connected to the ditch to the north and south.

<i>Salix species</i>	Willow species	D
<i>Crataegus monogyna</i>	Hawthorn	A
<i>Rubus fruticosus agg.</i>	Bramble	A

KEY - D = Dominant, A = Abundant, F = Frequent, O = Occasional, R = Rare

## **DRAWINGS**

**G7960.006 - Phase 1 Habitat Survey**  
**G7960.007 - Ecological Constraints Plan**



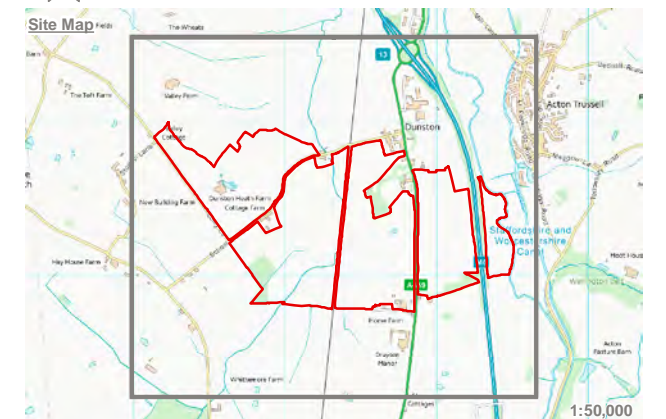
**KEY**

- Site boundary
- Semi-natural broad-leaved woodland
- Plantation broad-leaved woodland
- Plantation mixed woodland
- Dense/continuous scrub
- Semi-improved neutral grassland
- Improved grassland
- Marsh/marshy grassland
- Continuous bracken
- Tall ruderal
- Ephemeral pool
- Standing water
- Spoil
- Arable
- Amenity grassland
- Bare ground with ephemeral/short perennial
- Building
- Bare ground
- Hardstanding

**Note:**

The locations of habitats and habitat features are indicative.

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Rev	Description	Drawn	Approved	Date

**TEP** | **THE ENVIRONMENT PARTNERSHIP**

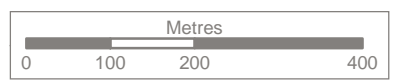
Genesis Centre, Birchwood Science Park, Warrington WA3 7BH  
 Tel 01925 844004 e-mail tep@tep.uk.com www.tep.uk.com

Project  
**Dunston Village, Staffordshire**

Title  
**Phase 1 Habitat Survey**

Drawing Number  
**G7960.006.1** Sheet 1 of 3

Drawn JO	Checked AH	Approved LC	Scale 1:9,000 @ A3	Date 06/12/2019
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393000





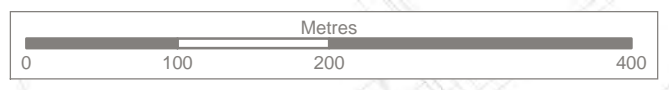
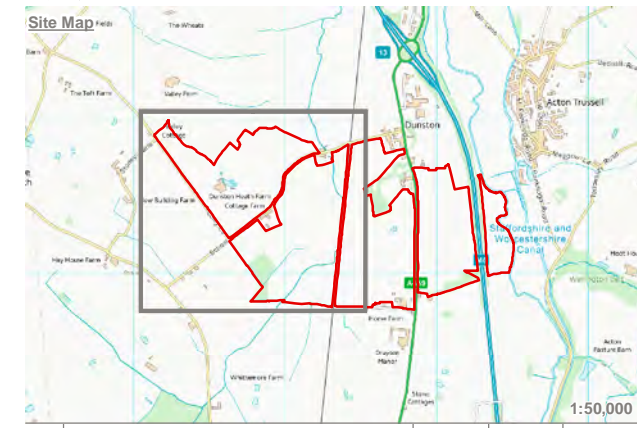
**KEY**

- Site boundary
- H Target note
- E Scattered scrub
- ! Scattered broad-leaved tree
- ! Broad-leaved tree with low bat potential
- ! Broad-leaved tree with moderate bat potential
- ! Broad-leaved tree with high bat potential
- Ditch
- ? Running water
- V Native species-rich intact hedge
- V Native species-rich intact hedge and ditch
- V Native species-rich intact hedge and dry ditch
- Species-poor intact hedge
- Species-poor intact hedge and ditch
- Species-poor intact hedge and dry ditch
- V Native species-rich defunct hedge
- Species-poor defunct hedge
- Species-poor defunct hedge with ditch
- V Native species-rich hedge and trees
- Fence
- Semi-natural broad-leaved woodland
- Plantation mixed woodland
- Dense/continuous scrub
- Semi-improved neutral grassland
- Improved grassland
- Tall ruderal
- Ephemeral pool
- Standing water
- Arable
- Amenity grassland
- Bare ground with ephemeral/short perennial
- Building
- Bare ground
- Hardstanding

**Note:**

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Project  
**Dunston Village, Staffordshire**

Title  
**Phase 1 Habitat Survey**

Drawing Number  
**G7960.006.2** Sheet 2 of 3

Drawn	Checked	Approved	Scale	Date
JO	AH	LC	1:5,000 @ A3	06/12/2019





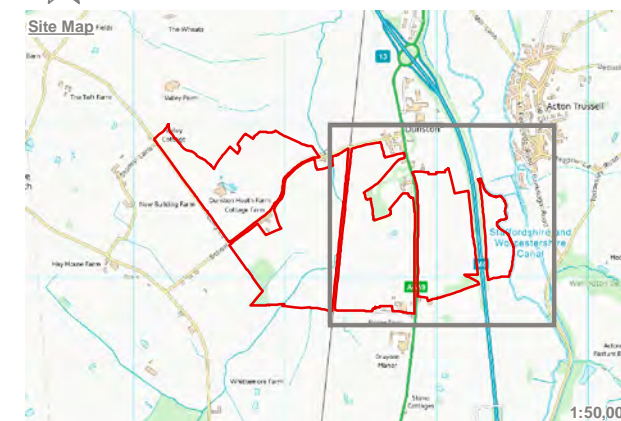
**KEY**

- Site boundary
- H Target note
- E Scattered scrub
- ! Scattered broad-leaved tree
- ! Broad-leaved tree with low bat potential
- ! Broad-leaved tree with moderate bat potential
- ! Broad-leaved tree with high bat potential
- Ditch
- ? Running water
- ~ Native species-rich intact hedge
- Species-poor intact hedge
- Species-poor intact hedge and ditch
- Conifer hedge
- ~ Native species-rich defunct hedge
- ~ Native species-rich hedge and trees
- + Fence
- Semi-natural broad-leaved woodland
- Plantation broad-leaved woodland
- Dense/continuous scrub
- Semi-improved neutral grassland
- Improved grassland
- Marsh/marshy grassland
- Continuous bracken
- Tall ruderal
- Standing water
- Spoil
- Arable
- Building
- Bare ground
- Hardstanding

**Note:**

The locations of habitats and habitat features are indicative.

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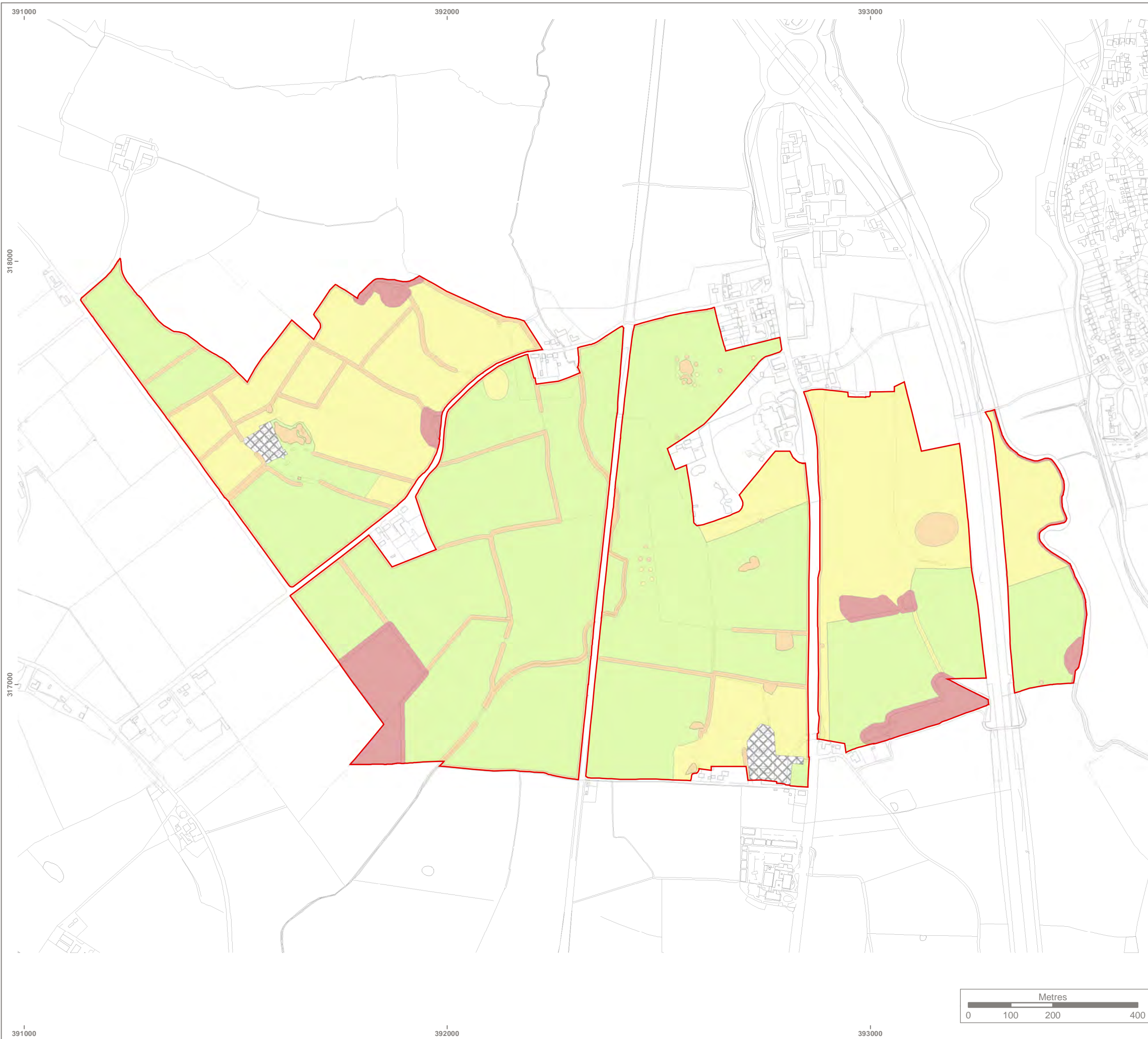
Project  
**Dunston Village, Staffordshire**

Title  
**Phase 1 Habitat Survey**

Drawing Number  
**G7960.006.3** Sheet 3 of 3

Drawn	Checked	Approved	Scale	Date
JO	AH	LC	1:5,000 @ A3	06/12/2019





**KEY**

Site boundary

**Ecological Constraints**

High Constraint 1 - Retain. Contains protected or designated habitat or forms important part of wildlife corridor.

High Constraint 2 - Would be difficult and/or costly to mitigate for loss. Contains high quality priority habitat which has the potential to contain protected species. May be 'important' hedgerow.

Medium Constraint - Consider retention. Good design can override the need for retention.  
 Potential area for ecological enhancement or translocation.

Low Constraint - Areas of low ecological value suitable for hard end use development.

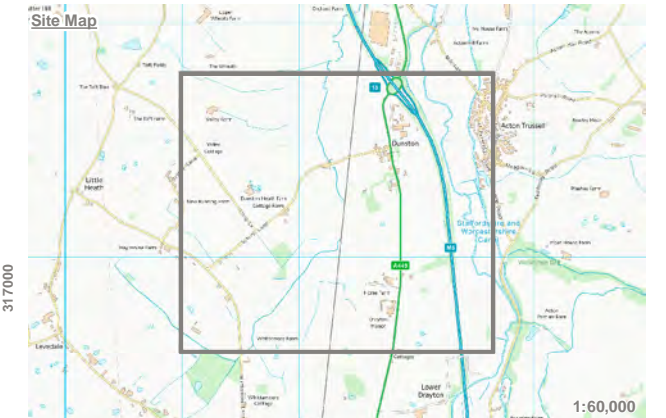
Not applicable



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Site Map



Rev	Description	Drawn	Approved	Date



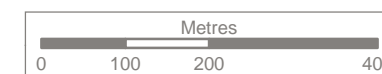
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Project  
**Dunston Village, Staffordshire**

Title  
**Ecological Constraints Plan**

Drawing Number  
**G7960.007**

Drawn	Checked	Approved	Scale	Date
JO	AH	LC	1:9,000 @ A3	06/12/2019







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## Appendix 6 – Rail Capacity Review – MDS Transmodal

# NEW STATION AT DUNSTON – PRELIMINARY TECHNICAL REVIEW

## Executive Summary

MDS Transmodal has been asked to consider the feasibility and issues concerning a new railway station at Dunston. This short technical note provides a preliminary view with respect to the feasibility of a new station at Dunston.

The site is flat and the railway line straight. A new railway station consisting of two platforms plus a shelter would most likely fit into the existing Network Rail land holding. At this stage we do not envisage any physical impediment to developing a new station at Dunston.

Ideally, a new station would be served by inserting an additional call into existing passing train services, rather than having to establish a completely new service. As a general rule of thumb, for regional and intercity type train services an additional station call will generally add around 3 minutes to the overall end-end journey time between origin and terminating stations. However, this approach can have wider operational impacts elsewhere on the network, as trains consequently pass through capacity pinch-points slightly earlier/later, potentially generating conflicting train movements.

The main line between Wolverhampton and Stafford currently accommodates 6 passenger services per direction in most daytime hours. The *Cross Country* and *Avanti West Coast* services are long-distance intercity type operations, providing fast transit times between major centres of population (and therefore unlikely to call at a new Dunston station).

*London Northwestern* operates 3 trains per hour/direction passing Dunston (2tph to/from Liverpool and 1tph to/from Crewe via Stoke-on-Trent, all 3 services passing via Birmingham). A new station at Dunston could enjoy a similar level of service to that at Penkridge (twice-hourly per direction), suggesting that it would be best served by additional calls from *London Northwestern's* existing passing services (to/from Liverpool and Crewe). Given congestion between Wolverhampton and Birmingham, the most likely strategy would be for trains serving Dunston to operate 3 minutes earlier/later north of Stafford, thereby utilising their existing paths through Wolverhampton.

The timings of *London Northwestern's* passing services has been assessed, derived from a timetabling and pathing exercise, to ascertain whether they could realistically undertake additional calls at Dunston without generating wider operational impacts elsewhere on the network. The outputs from this exercise suggests that a twice hourly service at Dunston would appear to be feasible, served from one of the Birmingham-Liverpool Lime Street services and the London Euston-Crewe via Birmingham New Street service. This approach does not generate a broad half-hourly departure in each direction, the ideal scenario, based on current timings. However, it would offer the option of direct services both to Crewe and Liverpool (connections along the North Wales coast at Crewe) and to Stoke-on-Trent (connections to Manchester).



## Preliminary Technical Review

MDS Transmodal has been asked to consider the feasibility and issues concerning a new railway station at Dunston. The site is located broadly mid-point between Stafford and Penkridge, on the Stafford to Birmingham New Street via Wolverhampton main line. This short technical note provides a preliminary view with respect to the feasibility of a new station at Dunston.

The site is flat and the railway line straight. A new railway station consisting of two platforms (probably at least 180m length so that they can accommodate 2 x Class 350 4-car train sets attached) plus a shelter would most likely fit into the existing Network Rail land holding. The station could be located anywhere on the stretch of track adjacent to the proposed development to suit road connections and drainage requirements. Any new station would also need to conform to disability access standards, meaning a requirement for step-free access to each platform (either ramps or lifts leading to a foot-bridge or subway crossing). At this stage, therefore, we do not envisage any physical impediment to developing a new station at Dunston.

Ideally, a new station would be served by simply inserting an additional call into existing passing train services, rather than having to establish a completely new service (which would incur significant additional costs associated with procuring additional rolling stock and hiring train crews). However, this can have capacity implications and wider operational impacts elsewhere on the network. As a general rule of thumb, for regional and intercity type train services an additional station call will generally *add around 3 minutes* to the overall end-end journey time between origin and terminating stations. This takes into account the time required to stop a train, station dwell time (generally minimum one minute for intra-regional and intercity type train services) and then to accelerate back up to line speed. Under this operating scenario, inserting an additional call into an existing passing train service would see trains arrive at their terminating station 3 minutes later when compared with the existing timetabled path. This could be overcome by departing from the origin station 3 minutes earlier (thereby arriving at the terminating station at the existing arrival time).

However, such an approach could result in the amended train services passing through known capacity pinch-points (e.g. at-grade junctions or stations with limited platform capacity) 3 minutes earlier or later when compared with existing timetable paths, thereby potentially generating conflicting movements with other train services at those pinch-points which have not had their running schedules adjusted. These pinch-points could be located a significant distance away from the new station. Given that many locations on the network are known to be operating at capacity, there may not be scope to run 3 minutes earlier/later and not conflict with other trains. This is therefore an important issue to consider.

Further, as rolling stock is leased for fixed monthly charges, train operators like to 'sweat their assets' in order to minimise their per-unit operating costs (economies of scale). In practical terms, train operators will seek to maximise the in-service running time when compared with downtime at origin/terminating stations; train sets are therefore diagrammed with minimal turnback downtime.

There are also minimum turnback time requirements at stations set by Network Rail in order to aid service recovery following perturbations. Consequently, there may not be scope within a train set's turnback downtime to accommodate the 3 minutes (6 minutes on a round-trip basis) implied by inserting an additional call into an existing service.

Consequently, simply identifying that there are passing train services is not the correct approach to assessing overall feasibility. The wider network operational impacts, particularly with respect to potential conflicting train movements further along the network, also need to be considered. This has therefore been undertaken with respect to a new station at Dunston.

The main line between Wolverhampton and Stafford accommodates 6 passenger services per direction in most daytime hours, as follows:

- South Coast – Manchester Piccadilly: 1 train per hour (tph) operated by *Cross Country* (runs via Stoke-on-Trent);
- Bristol/South West – Manchester Piccadilly: 1 tph operated by *Cross Country* (runs via Stoke-on-Trent);
- London Euston/Birmingham – Edinburgh/Glasgow: 1 tph operated by *Avanti West Coast*<sup>1</sup>;
- Birmingham New Street – Liverpool Lime Street: 2 tph operated by *London Northwestern* (runs direct Stafford-Crewe, generally extensions of London Euston to Birmingham services);
- London Euston – Crewe via Birmingham New Street: 1 tph operated by *London Northwestern* (runs via Stone and Stoke-on-Trent).

In addition, approximately one freight train per hour is pathed through the site (i.e. one every 2 hours per direction). The *Cross Country* and *Avanti West Coast* services are long-distance intercity type operations, providing fast transit times between major centres of population. It is therefore unlikely that a call from these passing services at a new Dunston station will be feasible.

The situation at the close-by Penkridge station, similar to Dunston in terms of the local passenger/residential market, probably provides the most appropriate operating model. The station at Penkridge is currently has two trains per hour per direction calling, both from London Northwestern's Birmingham-Liverpool service. Penkridge station accommodated 257,000 passenger movements in 2017-2018 and had a local parish population of 8,500 (which includes Dunston). This represents a relatively high level of utilisation for a semi-rural area and reflects the relatively compact nature of Penkridge itself, centred around the station. A twice hourly frequency is attractive, particularly as the services are relatively rapid to the 3 main centres of population at Stafford (7 minutes), Wolverhampton (10 minutes) and Birmingham (34 minutes). By connection, Manchester can be reached in 70 minutes and London in 98 minutes. Liverpool can be reached directly in 70 minutes.

---

<sup>1</sup> The new intercity west coast franchise operated by First Group and Trenitalia, branded as *Avanti West Coast*. This replaced the former Virgin Trains franchise on 8 December 2019

A new station at Dunston could enjoy a similar level of service, suggesting that it would be best served by additional calls from *London Northwestern's* existing passing services (to/from Liverpool and Crewe). We have therefore considered whether these existing train services passing Dunston could realistically undertake additional calls to provide a twice hourly service, without generating significant wider network implications elsewhere (as described).

As noted, for regional type train services an additional station call will generally add around 3 minutes to the overall end-end journey time. In the case of Dunston, this could be accommodated to the south of the site, with trains consequently arriving at Wolverhampton/Birmingham New Street 3 minutes later than currently timetabled (for southbound trains) or departing 3 minutes earlier for northbound services. Such an approach would mean trains occupying the same timetabled paths north of Stafford. Alternatively, trains could occupy the same timetabled paths to the south of the site, with services consequently running north of Stafford 3 minutes later when compared with their existing paths (for northbound trains) or 3 minutes earlier (for southbound trains).

However, the two-track railway route is congested between Wolverhampton and Birmingham. In addition to the 6 train services described above, two further trains per hour from Shrewsbury join the route at Wolverhampton, and there is also a twice-hourly local (all stations) service operating between Wolverhampton and Birmingham New Street. If a new station was to be built at Dunston, the most likely strategy would therefore be for trains to operate 3 minutes earlier/later north of Stafford (as described), thereby utilising their existing paths through Wolverhampton. The West Coast Main Line north of Stafford to Winsford (via Crewe) is four tracked, meaning that amending current path timings should be more feasible.

Undertaking a timetable and pathing exercise, we have therefore assessed whether the existing (passing) London Northwestern trains could realistically call at a new Dunston station and consequently operate 3 minutes earlier/later north of Stafford without generating any conflicting train movements. To undertake this exercise, the current Working Timetable (WTT) over a four-hour day-time period (1000 to 1400) was plotted onto traingraph diagrams. Tuesday 17 December (i.e. the new timetable coming into operation on the 15 December) was used, this being considered to be a representative day. Given clock-face timetabling, conclusions with respect to this four-hour period should be reflected across all day-time hours.

Traingraphs are a visual representation of the WTT, allowing the location of trains at a particular moment in time to be identified (each line represents the movement of a particular train service through distance and time). Consequently, where lines intersect this represents two or more trains being at the same location at that particular time. This is not a problem where trains are occupying different tracks or station platforms. Conversely, pathing conflicts will occur where trains have been scheduled in such a way that they occupy the same section of track or pass through an at-grade junction at the same time. The use of traingraphs therefore allows changes to existing train services to be 'tested' while ensuring there are no pathing conflicts and that minimum headway requirements are adhered to.



Amended timings have conformed to Network Rail Timetable Planning Rules for London North Western, as follows:

#### **Headways between following trains**

- Wolverhampton to Stafford – 4 minutes
- Stafford to Crewe – 3 minutes
- Crewe to Weaver Junction – 4 minutes; and
- Weaver Junction to Liverpool Lime Street – 3 minutes.

#### **Junction margins (i.e. time required between conflicting movements at junctions)**

- Standard values – 3 minutes for all conflicting moves. However, if the second move is a crossing move, a margin of 2 minutes shall apply to the second move

#### **Station dwell times (minimum)**

- Penkridge (and assumed same will apply to Dunston) – 1 minute
- Stafford – 1 minute
- Crewe – 2 minutes
- Runcorn – 1 minute; and
- Liverpool South Parkway – 1 minute.

#### **Turnback Times (minimum)**

- Liverpool Lime Street – 4 minutes (standard value for EMU).

The traingraphs for the four hour period are attached to this technical note. The precise timings of the three London Northwestern services considered are shown in the table below. The key conclusions to be drawn from this exercise are summarised below.

- The train-sets forming services arriving Liverpool at broadly xx:40 in each hour would then form the services departing at xx:05 the following hour (i.e. 25 minutes turnback). Likewise, the train-sets forming the services arriving Liverpool at broadly xx:10 in each hour would then form the services departing at xx:35 the same hour (i.e. 25 minutes turnback). The services running via Stone and Stoke-on-Trent to Crewe have broadly 30 minutes turnback timings at Crewe. These turnback timings could therefore accommodate a reduction of 6 minutes to accommodate a call at Dunston in both directions.
- The northbound service departing Wolverhampton at around xx:57 each hour to Liverpool cannot operate 3 minutes later north of Stafford. In two of the four hours considered, running 3 minutes later north of Stafford would subsequently conflict with the Chester to Liverpool Lime Street service at Runcorn (operated by Transport for Wales or TfW). This cannot run 3 minutes later to compensate, as this service would then conflict with the London Euston-Liverpool service operated by Avanti West Coast. We have also examined whether the Chester to Liverpool Lime Street service could slightly operate earlier in both hours (with the London Northwestern service then occupying the TfW path north of

Runcorn), however this would consequently conflict with a freight train service to Garston FLT in one of the hours considered.

- The northbound service departing Wolverhampton at around xx:22 each hour to Liverpool could operate 3 minutes later north of Stafford without generating any conflicts (albeit with some very minor adjustments, which at this stage would appear achievable).
- The northbound service departing Wolverhampton at around xx:40 each hour to Crewe via Stone could operate 3 minutes later north of Stafford without generating any conflicts (albeit with some very minor adjustments, which at this stage would appear achievable).
- The southbound service departing Liverpool at broadly xx:05 cannot operate 3 minutes earlier north of Stafford. It would subsequently conflict with a Glasgow to London Euston (Avanti West Coast) service passing at Weaver Junction.
- The southbound service departing Liverpool at broadly xx:35 could operate 3 minutes earlier north of Stafford without generating any conflicts (albeit with some very minor adjustments, which at this stage would appear achievable).
- The southbound service from Crewe via Stoke-on-Trent and Stone, calling Stafford currently at broadly xx:46 could operate 3 minutes earlier north of Stafford without generating any conflicts (albeit with some very minor adjustments, which at this stage would appear achievable).

Consequently, at this stage of the analysis a twice hourly service at Dunston would appear to be feasible, served from one of the Birmingham-Liverpool Lime Street services and the London Euston-Crewe via Birmingham New Street service. Note that this approach does not generate a broad half-hourly departure in each direction, the ideal scenario, based on current timings. However, it would offer the option of direct services both to Crewe and Liverpool (connections along the North Wales coast at Crewe) and to Stoke-on-Trent (connections to Manchester).

In the event that HS2 is completed then the 3 intercity trains that pass through the site may all transfer onto the new and faster route, leaving the 3 semi-fast trains and probably an increased volume of freight trains, partly because of rail freight market growth and specifically because a new rail linked distribution park is expected to be built south of Penkridge (Four Ashes). This would also present an opportunity to re-cast the timetable in order to generate a broadly half-hourly departure in each direction.

The incremental revenues that could be earned from an additional station may be sufficient to justify its construction and to fund incremental additional rolling stock (approximately 11 people alight per train). In the peak, it maybe that passengers boarding at Penkridge add (net) to volumes between Wolverhampton and Birmingham and may therefore add to total rolling stock capacity required, but this would be marginal. The proposed new development will accommodate a population similar to that already living in the parish of Penkridge so that overall passenger volumes could be expected to be double also (i.e. an additional 250,000 passengers p.a. by rail). However, it would be important to compare the implications of a new station with a dedicated frequent bus service linking Dunston with Stafford and Penkridge stations. There is also a further option of developing a park and ride facility

at Dunston to relieve peak car congestion at Stafford in an effort to attract passengers bound for Wolverhampton and Birmingham to Dunston instead of Stafford station.

**Table: London Northwestern Trains Passing Dunston 1000 to 1400**

Wolverhampton dep	0957	1022	1040	1057	1122	1141
Penkridge dep	1006	1030		1106	1131	
<i>Penkridge pass</i>			<i>1049</i>			<i>1150</i>
Stafford arr	1012	1037	1055	1112	1137	1156
Stafford dep	1013	1038	1056	1113	1138	1157
Crewe arr	1031	1056	<i>To Stone</i>	1131	1156	<i>To Stone</i>
Crewe dep	1033	1059		1133	1158	
Runcorn arr	1051	1121		1153	1224	
Runcorn dep	1052	1122		1154	1225	
Liverpool S P-way dep	1101	1131		1203	1234	
Liverpool LS arr	1110	1040		1212	1243	

Wolverhampton dep	1155	1222	1240	1257	1322	1340
Penkridge dep	1204	1231		1206	1331	
<i>Penkridge pass</i>			<i>1249</i>			<i>1349</i>
Stafford arr	1210	1237	1255	1312	1336	1354
Stafford dep	1211	1238	1256	1313	1337	1355
Crewe arr	1230	1256	<i>To Stone</i>	1331	1355	<i>To Stone</i>
Crewe dep	1232	1259		1334	1357	
Runcorn arr	1252	1321		1356	1423	
Runcorn dep	1253	1322		1357	1425	
Liverpool S P-way dep	1302	1330		1405	1432	
Liverpool LS arr	1311	1340		1414	1442	

Calling potential at Dunston

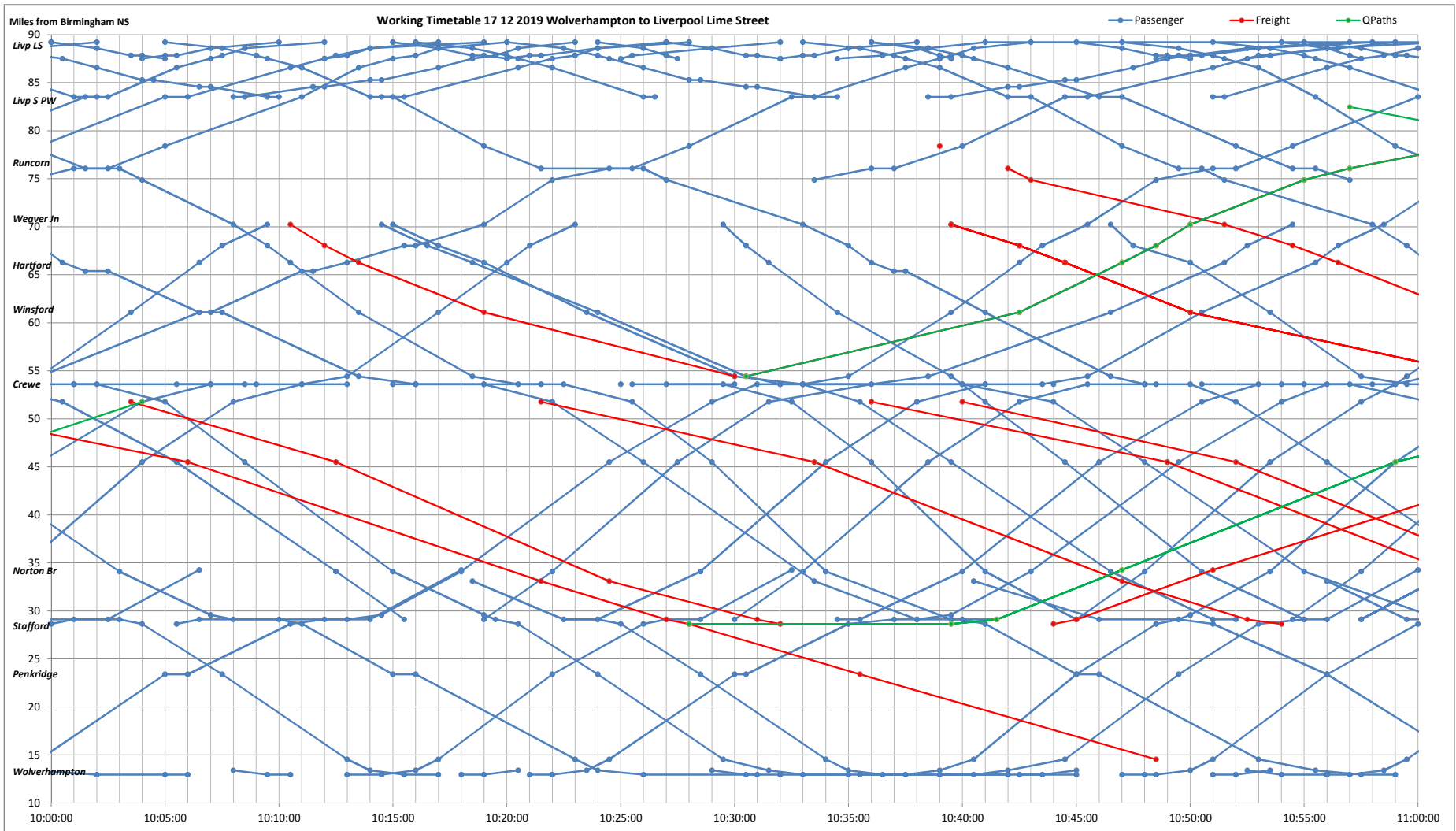


Liverpool LS dep	0905	0935		1005	1033	
Liverpool S P-way dep	0915	0945		1015	1043	
Runcorn arr	0922	0951		1022	1049	
Runcorn dep	0926	0952		1026	1050	
Crewe arr	0948	1016		1048	1117	
Crewe dep	0950	1019	<i>From Stone</i>	1050	1119	<i>From Stone</i>
Stafford arr	1008	1038	1046	1009	1139	1144
Stafford dep	1010	1040	1049	1010	1140	1145
<i>Penkridge pass</i>			<i>1056</i>			<i>1150</i>
Penkridge dep	1016	1046		1116	1146	
Wolverhampton arr	1026	1057	1105	1126	1157	1201

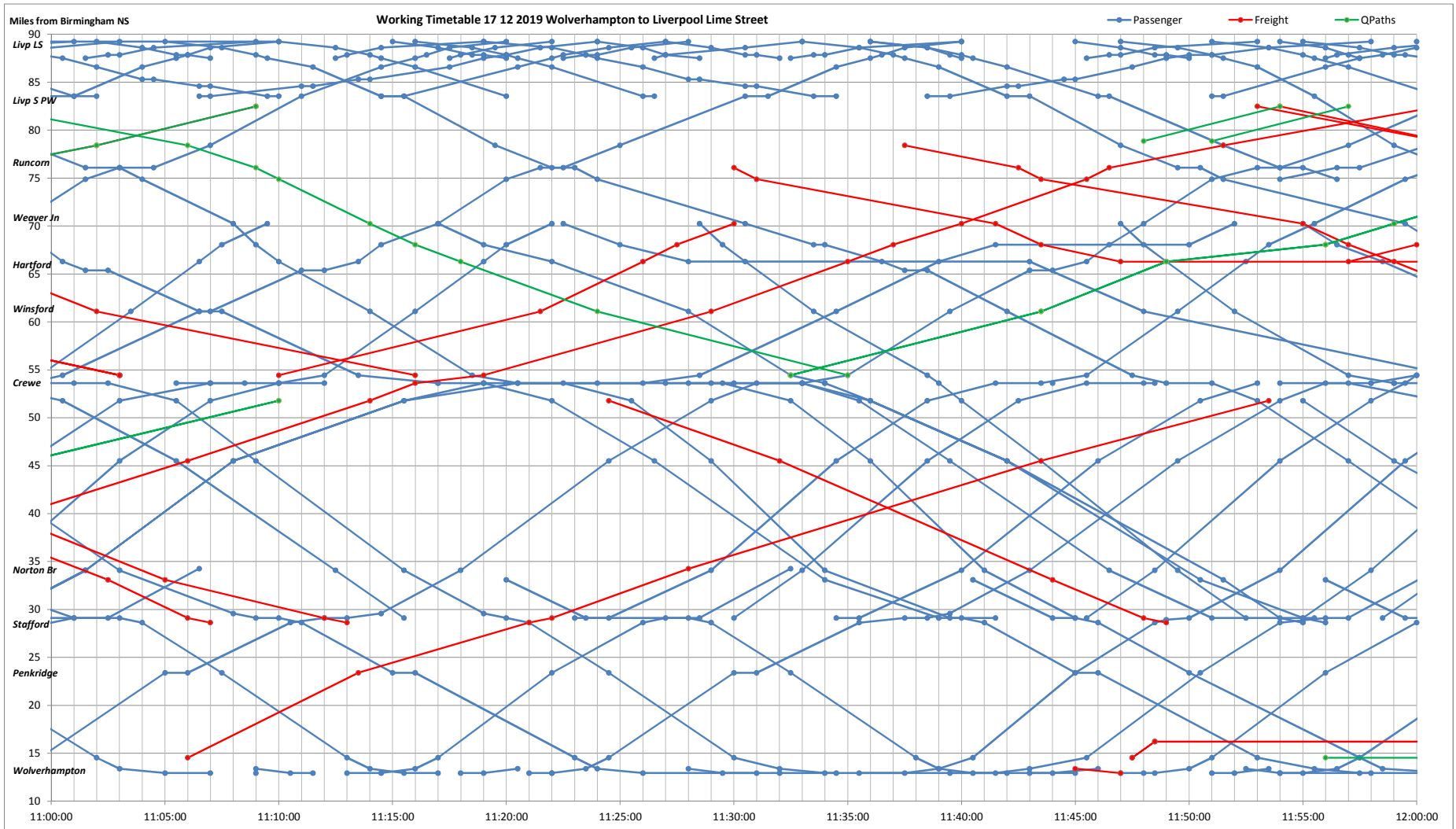
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Liverpool S P-way dep	1115	1145		1215	1343	
Runcorn arr	1122	1149		1222	1349	
Runcorn dep	1123	1150		1226	1350	
Crewe arr	1149	1217		1248	1317	
Crewe dep	1151	1219	<i>From Stone</i>	1250	1319	<i>From Stone</i>
Stafford arr	1209	1239	1244	1309	1339	1344
Stafford dep	1210	1240	1245	1310	1340	1345
<i>Penkridge pass</i>			<i>1250</i>			<i>1350</i>
Penkridge dep	1216	1246		1316	1346	
Wolverhampton arr	1226	1257	1302	1326	1357	1401

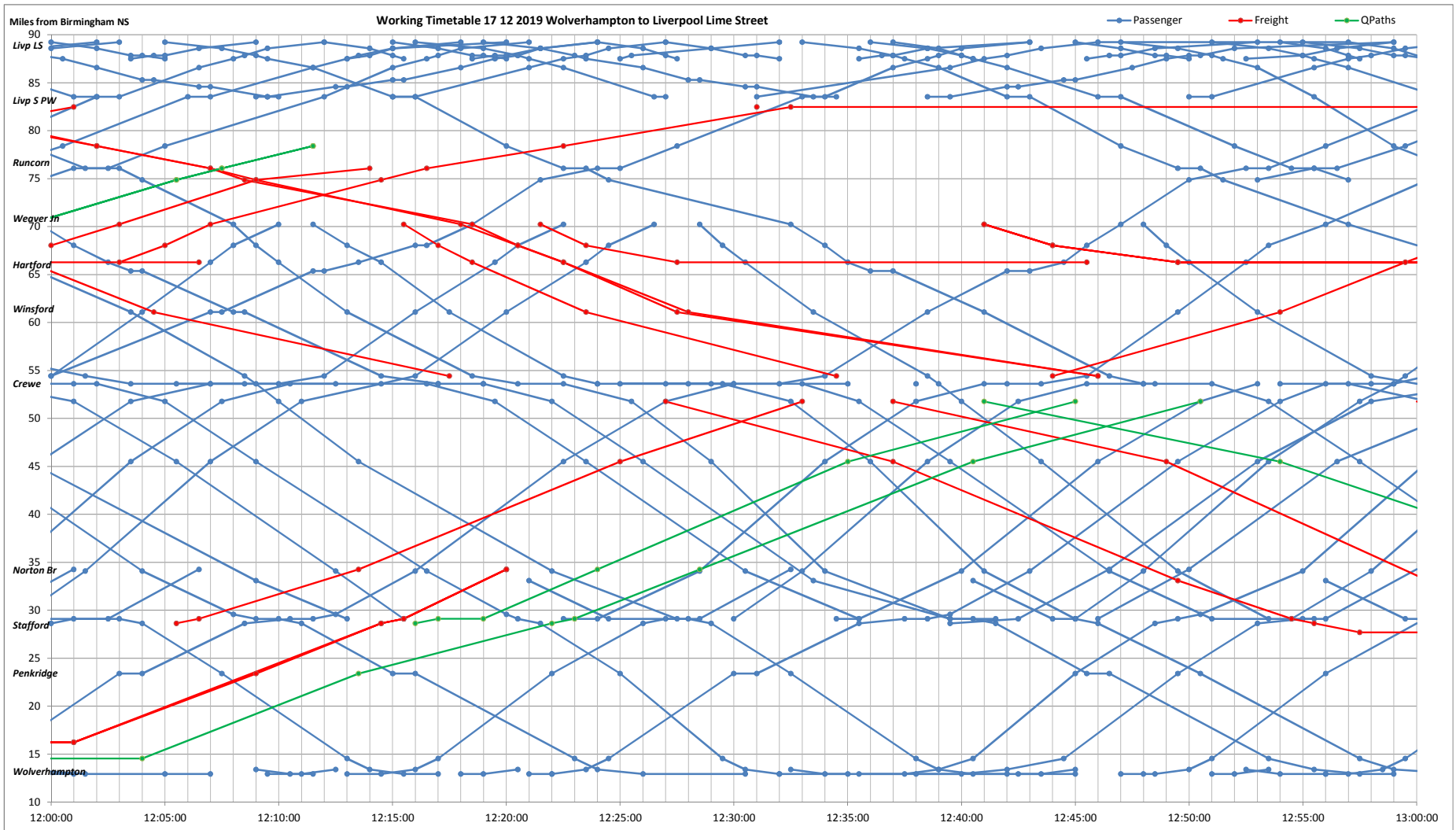
Calling potential at Dunston

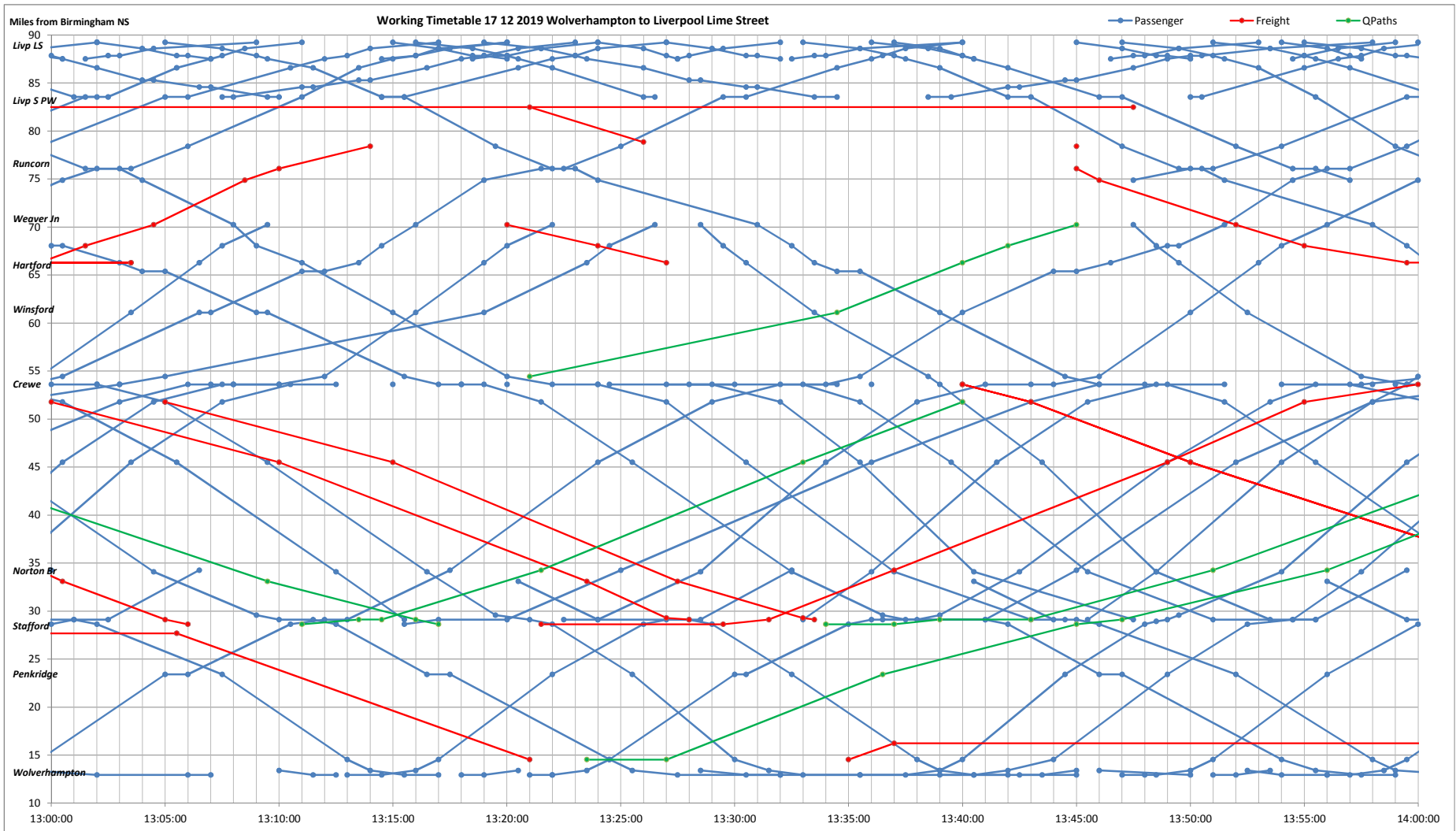
# APPENDIX – TRAINGRAPH DIAGRAMS















## Appendix 7 – New Settlement Option Pro Forms

**New Settlement Site Proformas**

Site reference	585	Address	Land off Gailey Island
Site size (ha)	97 ha (gross)	Proposed use	Residential mixed use
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
Conformity with infrastructure led strategy and opportunities for infrastructure delivery	<p>The site is a freestanding new settlement proposal with a potential site capacity above the SHELAA threshold of 1,500 dwellings and lying within the area of search initially identified in the 2018 GBHMA Strategic Growth Study and the Spatial Housing Strategy and Infrastructure Delivery Plan (2019) consultation.</p> <p>The centre of the site is roughly 4.6km to the nearest train station, 3.75km to the nearest local convenience store and 5.2km to the nearest education facility (in Penkridge). It is roughly 1.7km to the nearest regular bus stop (along the A449).</p> <p>The size of the site and submitted information to date suggest that on-site facilities will be limited to local retail centres and primary/first education facilities.</p>		
Sequential test	The site lies within the Green Belt, unlike other freestanding potential new settlement site options in the A449/West Coast Mainline corridor (Site 029).		
Green Belt harm	High		
Landscape sensitivity	Low-moderate		
Impact on historic environment	<p>HESA scores the site a green for direct potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required. The HESA scores the site an amber for indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted.</p>		
Known site constraints	<ul style="list-style-type: none"> <li>- The West Coast Mainline bisects the western edge of the site, preventing direct access from the majority of the site to the A449 to the west</li> <li>- A canal conservation area runs through the centre of the site, which may affect any subsequent site layout</li> <li>- Development would appear to remove an area of predominantly agricultural land containing isolated residential properties and small scale commercial businesses</li> <li>- Part of the site is within a mineral safeguarding area.</li> </ul> <p><u>LLFA comments</u> Medium-High Risk Location - Number of watercourses in location running through site - Recommend Early Pre-App</p>		

	<p><u>County Highways assessment</u> Initial concerns due to cumulative impacts on surrounding highways network and connectivity. Would need consultation with Highways England due to potential impacts on trunk road network.</p>
<p>Site opportunities</p>	<ul style="list-style-type: none"> <li>- Potential opportunity to link to canal towpath network that cuts across the site</li> <li>- The site is a single, large scale, regularly sized parcel capable of accommodating a permeable block layouts, although this is slightly compromised by a canal and the West Coast Mainline bisecting the site</li> </ul>
<p>Summary conclusions</p>	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> <li>• Similar Green Belt harm to the majority of new settlement options in the A449/West Coast Mainline corridor (site is ‘high harm’)</li> <li>• Lower landscape sensitivity than the majority of land in the A449/West Coast Mainline corridor location (site is ‘low-moderate’)</li> <li>• Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities’ proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.</li> <li>• Highways authority raise initial concerns with impact on surrounding highways network and connectivity</li> <li>• The site is not directly adjacent an existing town or larger village and appears unlikely to provide significant facilities beyond local retail centres and primary/first education</li> </ul> <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council’s preferred Spatial Housing Strategy.</p>



Site reference	585a	Address	Land off Gailey Island (parcel 2)
Site size (ha)	110 ha (gross)	Proposed use	Residential mixed use
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
Conformity with infrastructure led strategy and opportunities for infrastructure delivery	<p>The site is a freestanding new settlement proposal with a potential site capacity above the SHELAA threshold of 1,500 dwellings and lying within the area of search initially identified in the 2018 GBHMA Strategic Growth Study and the Spatial Housing Strategy and Infrastructure Delivery Plan (2019) consultation.</p> <p>The centre of the site is roughly 3.2km to the nearest train station, 2.3km to the nearest local convenience store and 3.9km to the nearest education facility (in Penkridge). It is roughly 450m to the nearest regular bus stop (along the A449).</p> <p>The size of the site and submitted information to date suggest that on-site facilities will be limited to local retail centres and primary/first education facilities.</p>		
Sequential test	The site lies within the Green Belt, unlike other freestanding potential new settlement site options in the A449/West Coast Mainline corridor (Site 029).		
Green Belt harm	High		
Landscape sensitivity	Low-moderate		
Impact on historic environment	HESA scores the site a green for direct potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required. The HESA scores the site an amber for indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted.		
Known site constraints	<ul style="list-style-type: none"> <li>- The site was previously part of a larger site suggestion (Site 585) but it is no longer clear whether the landowners are willing to make the land available for development</li> <li>- Development would appear to remove an area of predominantly agricultural land containing two large-scale wind turbines</li> <li>- The existing wind turbines on the site may significantly constrain the site layout/capacity</li> <li>- Part of the site is within Flood Zone 2/3, which if excluded leaves a gross site area of approximately 110ha</li> <li>- Part of the site is within a mineral safeguarding area.</li> </ul> <p><u>LLFA comments</u> Medium-High Risk Location - Number of watercourses in location running through site - Recommend Early Pre-App</p> <p><u>County Highways assessment</u></p>		

	Initial concerns due to cumulative impacts on surrounding highways network and connectivity. Would need consultation with Highways England due to potential impacts on trunk road network.
Site opportunities	<ul style="list-style-type: none"> <li>- Potential opportunity to link to canal towpath network in the south-east of the site and the public rights of way that run through the site</li> <li>- The site is a single, large scale, regularly sized parcel capable of accommodating a permeable block layouts, although this may be compromised by the existing wind turbines on site</li> </ul>
Summary conclusions	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> <li>• Similar Green Belt harm to the majority of new settlement options in the A449/West Coast Mainline corridor (site is 'high harm')</li> <li>• Lower landscape sensitivity than the majority of land in the A449/West Coast Mainline corridor location (site is 'low-moderate')</li> <li>• Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.</li> <li>• Highways authority raise initial concerns with impact on surrounding highways network and connectivity</li> <li>• The site is not directly adjacent an existing town or larger village and appears unlikely to provide significant facilities beyond local retail centres and primary/first education</li> </ul> <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>

Site reference	665	Address	Deanery Estate
Site size (ha)	139 ha (gross)	Proposed use	Residential mixed use
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm and landscape sensitivity.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
Conformity with infrastructure led strategy and opportunities for infrastructure delivery	<p>The site is a freestanding new settlement proposal with a potential site capacity above the SHELAA threshold of 1,500 dwellings and lying within the area of search initially identified in the 2018 GBHMA Strategic Growth Study and the Spatial Housing Strategy and Infrastructure Delivery Plan (2019) consultation.</p> <p>The site does not appear to have access to services and facilities in the wider area via existing footways.</p> <p>The size of the site and submitted information to date suggest that on-site facilities will be limited to local retail centres and primary/first education facilities.</p>		
Sequential test	The site lies within the Green Belt, unlike other freestanding potential new settlement site options in the A449/West Coast Mainline corridor (Site 029).		
Green Belt harm	High		
Landscape sensitivity	Moderate-high		
Impact on historic environment	HESA scores the site an amber for both direct and indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated or are at present predicted.		
Known site constraints	<ul style="list-style-type: none"> <li>- The site currently relies on a single track road with no footway to provide access to Penkridge/A449</li> <li>- The site would likely require a new highways/pedestrian access to be established over the West Coast Mainline in order to be delivered, which has not been confirmed as deliverable at this stage</li> <li>- Its development would appear to remove an area of agricultural land</li> <li>- Part of the site is within a mineral safeguarding area.</li> <li>- Part of the site in in Flood Zone 3, however the site could accommodate over 1,500 dwellings cumulatively without locating residential development in these areas</li> </ul> <p><u>LLFA comments</u> High Risk Site - Early Communication with EA and LLFA - full Pre-app Recommend - suggested to not be used for Vulnerable Development - River Penk High Flood Plane</p> <p><u>County Highways assessment</u> Strong initial concerns due to establishing multiple site accesses to facilitate</p>		



	development and cumulative impacts on surrounding highways network.
Site opportunities	<ul style="list-style-type: none"> <li>- Potential opportunity to link to Public Right of Way (PRoW) that cuts across the site</li> <li>- The site is a single, large scale, regularly sized parcel capable of accommodating a permeable block layouts</li> </ul>
Summary conclusions	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> <li>• Similar Green Belt harm to the majority of new settlement options in the A449/West Coast Mainline corridor (site is 'high harm')</li> <li>• Lower landscape sensitivity than the majority of land in the A449/West Coast Mainline corridor location (site is 'low-moderate')</li> <li>• Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal, but failing to consider such areas for development may result in an unsustainable pattern of development and would run contrary to the Association of Black Country Authorities' proposed use of the Green Belt/landscape evidence base as set out in Duty to Co-operate correspondence.</li> <li>• Highways authority raise initial concerns with impact on surrounding highways network and connectivity</li> <li>• The site does not have a demonstrable footway access into the adjacent larger village and appears unlikely to provide significant facilities beyond local retail centres and primary/first education</li> </ul> <p><u>Conclusion</u></p> <p>Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council's preferred Spatial Housing Strategy.</p>

Site reference	029	Address	Land – Dunston Estate
Site size (ha)	120 ha (gross)	Proposed use	Residential mixed use
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>No major negative or positive effects are predicted.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
Conformity with infrastructure led strategy and opportunities for infrastructure delivery	<p>The site is a freestanding new settlement proposal with a potential site capacity above the SHELAA threshold of 1,500 dwellings and lying within the area of search initially identified in the 2018 GBHMA Strategic Growth Study and the Spatial Housing Strategy and Infrastructure Delivery Plan (2019) consultation.</p> <p>The centre of the site is roughly 3.8km to the nearest train station and 3.4km to the nearest local convenience store (in Penkridge). The centre of the site is roughly 600m to the nearest regular bus stop and 1.05km to the nearest education facility (in Dunston).</p> <p>The size of the site and submitted information to date suggest that on-site facilities will be limited to local retail centres and primary/first education facilities.</p>		
Sequential test	The site is entirely within the Open Countryside and therefore the delivery of growth in this location will not require Green Belt release.		
Green Belt harm	-		
Landscape sensitivity	Moderate		
Impact on historic environment	HESA scores the site an amber for both direct and indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated or are at present predicted.		
Known site constraints	<ul style="list-style-type: none"> <li>- From the site heading towards the school there is a short stretch along School Lane has no pedestrian footway.</li> <li>- Its development would appear to remove an area of agricultural land</li> <li>- Part of the site is within a mineral safeguarding area.</li> <li>- Part of the site in in Flood Zone 3, however the site could accommodate over 1,500 dwellings cumulatively without locating residential development in these areas</li> <li>- A large portion of the site would require an access to be established over the West Coast Mainline in order to be delivered, which has not been confirmed as deliverable at this stage</li> <li>- TPOs are located within the site</li> <li>- Small sections of high and very high habitat distinctiveness to the south of the site</li> </ul> <p><u>LLFA comments</u> High Risk Site - Early Communication with EA and LLFA - full Pre-app Recommend</p>		

	<p>- suggested to not be used for Vulnerable Development - Number of Watercourses in Location - High Risk Site - Flood Planes</p> <p><u>County Highways assessment</u> Initial concerns due to site severance (West Coast Mainline) and establishing multiple site accesses. Would need consultation with Highways England due to potential impacts on M6 Junction 13.</p>
<p>Site opportunities</p>	<ul style="list-style-type: none"> <li>- Potential opportunity to link to Public Right of Way (PRoW) that cuts across the site</li> <li>- The site contains areas capable of accommodating a permeable block layouts, although the site is not a single cohesive parcel of land due to the flood zones/rail line running separating large parts of the site from the A449</li> </ul>
<p>Summary conclusions</p>	<p><u>Key positives and negatives</u></p> <ul style="list-style-type: none"> <li>• On non-Green Belt land, unlike the majority of new settlement options in the A449/West Coast Mainline corridor</li> <li>• Of average landscape sensitivity compared to the majority of land in the A449/West Coast Mainline corridor location (site is ‘moderate’)</li> <li>• Highways authority raise initial concerns with site severance due to the lack of agreed access over the West Coast Mainline and potential difficulties of establishing the required multiple site accesses within the parcel</li> <li>• The site is not directly adjacent an existing town or larger village and appears unlikely to provide significant facilities beyond local retail centres and primary/first education</li> </ul> <p><u>Conclusion</u> Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well as to warrant a departure from the Council’s preferred Spatial Housing Strategy.</p>



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

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