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West Midlands

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**THE BLACK COUNTRY PLAN
CONSULTATION DRAFT 2021**

RESPONSE BY CAMPAIGN TO PROTECT RURAL ENGLAND, WEST MIDLANDS REGION

October 2021

Introduction

The Campaign to Protect Rural England welcomes the opportunity to comment on the emerging Black Country Plan. This response is on behalf of the West Midlands Regional Group which works at the regional level. The West Midlands Regional Group of CPRE is representing here the CPRE Staffordshire, Shropshire and Worcestershire Branches. The Black Country Plan affects or has implications for all three County Branch areas.

We commissioned specific work on housing and economic development assessments and on the Black Country Authorities' Green Belt Study by Land Use Consultants ('LUC'), from Gerald Kells, an independent Policy Advisor. The detailed report by Gerald Kells on the Urban Capacity of the four Boroughs of the Black Country is attached and should be read with this response.

We note that while the figures given in the ABCA Urban Capacity Update seem broadly similar to the plan, they are set out in different ways, making it harder to make direct comparisons. Ensuring the link between the evidence base figures and the policies is clear is something that should we think be revised and made comparable before a Submission Draft (Regulation 19) version of the Plan is published.

We also note as a general point that much of the evidence used by ABCA pre-dates the COVID Pandemic and, as is acknowledged in several of the reports, the impact of this, as well as the longer-term impact of other upheavals, particularly BREXIT, remains uncertain. Most immediately the Pandemic has hastened the move towards on-line shopping and more extensive home working practices.

These changes will directly affect the need for land and premises and free up opportunities for new housing, particularly in town and city centres, something acknowledged in the Centres Study (Para 3.36) and, even more importantly, an underlining factor in the decision of the Government in December 2020 to direct its housing uplift to the twenty largest cities (one of which is Wolverhampton).

As the attached report explains, there is considerable scope for new land to come forwards for housing from redundant retail and employment land and there are a number of ways this could be accounted for in the Plan, by ringfencing the Wolverhampton uplift (if it continues) for new urban regeneration sites, by identifying additional land in urban centres, by reviewing the criteria on redundant employment land, or by including a significant allowance for larger windfalls, perhaps in line with historic delivery.

We acknowledge there is considerable uncertainty currently and little has been done to research the Post COVID issues. We would ask that ABCA commissions work now to ensure that these sources of supply of land for housing are fully explored prior to any firm decision on the controversial Green Belt sites in the plan, especially given the exceptional circumstances required to justify such releases.

The following key points are central to CPRE's concerns:

1. The policy on Climate Change is inadequate. There should be a specific goal to reduce emissions with specific targets which should be linked to more sustainable location of development.
2. The level of the housing requirement stated is not justified; the Black Country Authorities should be amassing evidence to justify using more up to date figures.
3. The additional housing allocated to Wolverhampton as a result of the 16 December 2020 policy statement should not be included in the overall requirement but identified for additional brownfield sites.
4. There should be a higher allowance for windfalls, including larger windfalls in the plan.
5. While employment land should generally be protected this may also provide additional land. The BEAR analysis, which focuses on protecting employment land, also needs to take account of future trends.
6. The need for retail and office space in City and Town Centres and other Retail locations should be reviewed post-COVID. It may be that some managed contraction of retail space could create centres which are sustainable in the longer term, linked to new housing in centres.

7. The proposed loss of Green Belt should be reviewed. Many of the allocated sites, particularly the large number in Walsall, are in areas which have a high or very high impact on the Green Belt as well as impacts on the environment and on amenity.

The plan includes a large number of policies and we have not been able to comment on all of them in detail. This does not imply we agree with or disagree with other policies not mentioned.

Specific Policies

Policy CSP1

Housing Land

West Midlands CPRE object to the proposed level of housing in Para 1 (a). In particular, we do not consider the removal of land from the Green Belt on the scale proposed for 7,720 houses is justified. While there is a shortfall identified in the plan, the attached report (which we commissioned) on the Updated Urban Capacity Report casts doubt both on the need and supply side of the housing assessment, something we address in more detail in relation to Policy HOU1.

A policy which provided 40,117 houses in line with the capacities identified from other sources would perhaps be appropriate but would fail to account for the additional housing sources identified in that report as likely to come forwards, notably from windfalls (perhaps as many as 6,000 additional homes). In our view the potential for housing development on existing retail, leisure and employment sites which are underused, or likely to come on the market for redevelopment, is still not being adequately explored.

Moreover, the 35% uplift of housing in Wolverhampton was not intended to result in additional greenfield housing, as is made clear in the Government Statement of 16 Dec 2020, whether in the Black Country or in surrounding area, so the Plan should identify that housing (5130 units) as specifically to be met from additional brownfield land (a position being taken by Bradford Council, for example).

Employment Land

In terms of Employment Land, we generally support the allocations but have specific concerns about the Allocations at WAE 409 and 410, close to the Sandhills NGA, (which amount to some 14.33 hectares). These are two parcels of land where the impact on Green Belt is considered by LUC to be either Moderate-High or High, although they are bounded by roads and so have a defensible boundary.

Taking them out would reduce the total Employment Land allocated to 340 hectares in CSP1.

However, we would urge ABCA to review this amount. The BEAR Study appears to be biased towards retaining employment land. While this may be the right approach there may well be sites where the balance still favours change of use to housing, and/or where the sites will become available because demand is suppressed. On both these counts the total; figure of 355 hectares should be reviewed prior to submission of the Final Draft (Regulation 19 stage).

Green Belt

We also object to Para 2 (a) and (d) of CSP1. We believe most, if not all, reasonable development should be accommodated within the Black Country conurbation itself, and only very limited Green Belt releases accepted. We do not support the proposal for 'Neighbourhood Growth Areas' (NGAs), which are in effect Urban Housing Extensions into the Green Belt. In many cases they are on sites which, in the LUC Green Belt Study are considered to have a high impact on the Green Belt.

We agree with Para 2 (e) which seeks to support the integrity of the West Midlands Green Belt. However, this policy wording assumes that the NGAs have already been removed, causing damage to the Green Belt as it is now.

Climate Change

We also support Para 2 (g). However, the plan lacks a clear policy to mitigate climate change and the location of development on sites such as the NGAs is not clearly tested against its impact on Climate Change. A policy is needed which specifically elucidates the target the Black Country has for Net Zero Carbon Emissions and how that will be achieved in terms of the spatial location of development.

Table 2 (Development Strategy)

We also, therefore, object to Table 2. We would remove the NGAs, and instead include housing identified from the sources of supply identified in our report, including larger wind-falls and additional town centre housing.

We would also reduce the overall total. We believe there is a strong case for the Black Country arguing to adopt the 2016-based ONS Projections which would amount to 55,993 dwellings in the Plan Period (60,059 if the 35% uplift for Wolverhampton is included). That 35% uplift should be specifically aimed at Urban Regeneration sites and would (in general terms) be equivalent to and so numerically replace the Neighbourhood Growth Areas.

As a result of such a calculation the potential overspill to be dealt with through any duty to cooperate arrangement would be reduced by approximately 15,000 to approximately 13,000.

Since there will be an opportunity to review the numbers prior to the Submission Draft stage, these approximate figures are a sound basis to review the provisional allocations and remove those allocations which impact on the countryside, undermine urban regeneration and would impact on the integrity of the Green Belt

Para 3.15-3.16 (Green Belt)

We object to Paragraph 3.15-3.16 of the Plan. This section of the Plan identifies the Green Belt assessment that has been undertaken and claims the impact of the chosen sites would '*cause the least harm to the purposes of the Green Belt and to landscape character*'.

However, the LUC Green Belt Study makes clear that many of the proposed development sites, particularly in Walsall are identified as having a High, even Very High impact on the

role of the Green Belt. Most are also in sensitive locations at the edge of Urban Areas with a high impact on the amenity of the Public. A particular example is the open land adjacent to Walsall Arboretum. A fault of the LUC Green Belt Study is that its choice of settlements to include in its analysis specifically excludes small sites at smaller settlements such as Rushall and Pelsall, creating a bias in favour of sites adjacent to those areas next to large urban areas - which are the sites now included in Plan.

Moreover, Para 3.16 of the Plan refers to defensible Green Belt boundaries. This would normally mean a road or other development. Yet there are sites which are poorly defined in that way. The Sutton Road site, for example, has no boundary to stop development further between the canal and Longwood Lane, The Sandhills site has no clear boundary towards Lichfield. The Bushbury site is adjacent to open land.

Green Belt Site (Neighbourhood Growth Area)	Council	Location	Green Belt Designation in LUCs Report
WAM242	Walsall	Next to Arboretum	High
WAM231	Walsall	Sutton Road	High
WAM234/250	Walsall	Streetly	High
WAM230/246/254	Walsall	Pacific Nursery	Moderate-High
WAM237	Walsall	Aldridge	Moderate (but Very High in MSA Area beyond)
WAM235	Walsall	Sandhills	High
WAM238/240	Walsall	High Heath/Pelsall	High
WAM236	Walsall	Pelsall	High
WAM232	Walsall	Bloxwich	High
WOH 262/263/264/271	Wolverhampton	Wednesbury	Low
WHO 257/258/259/260	Wolverhampton	Bushbury	260 Moderate/Others Very High
DUH 208	Dudley	Kingswinford	Moderate-High
DUH213	Dudley	Kingswinford Triangle	Moderate-High
DUH 206/207/209	Dudley	Stourbridge Railway Line	Moderate-High

Para 3.20-3.27 (Duty to Cooperate)

CPRE objects to the approach to Duty to Cooperate. The Government has signaled that it will seek to abolish this mechanism but has not said what will replace it. However, even if it stays the text is misleading in our view. It refers in Para 3.20 to land in the Black Country being ‘finite’. In practice there is likely to be considerable change during the Plan period to the urban core freeing up land for different purposes.

Coupled with the questions we raise regarding to housing numbers, our view is that the genuine requirement for housing in other local authority areas to meet the Black Country’s needs is likely to be considerably lower than anticipated.

We are aware that several local planning authorities, notably South Staffordshire and Shropshire, have offered to include significant amounts of housing in their plans to accommodate Black Country growth as the table below shows (reproduced from ABCA evidence to the Solihull Plan Inquiry.)

Local Plan	Status	Date	Potential contribution
Cannock Chase	Preferred Options	March 2021	500 homes towards the needs of the HMA
Lichfield	Pre-submission	July 2021	2,665 homes to meet wider HMA needs of which 2,000 are attributed to the Black Country
Shropshire	Publication	February 2021	1,500 homes to meet Black Country needs
South Staffordshire	Spatial Housing Strategy & Infrastructure Delivery (SHSID)	October 2019	4,000 homes in addition to local needs to meet needs of wider HMA.

In the case of Shropshire, the location remains unclear but is likely to be the M54 corridor which is poorly served by Public Transport and where large-scale housing is likely to exacerbate commuting into the conurbation, adding to congestion on the M54 and M6, and to carbon emissions.

In the case of South Staffordshire, the sites are near the conurbation but many have high environmental and Green Belt impact, for example the site at Little Penn. While these sites are outside the Black Country boundary, in many cases they will have similar effect to those within the conurbation.

CPRE Shropshire and CPRE Staffordshire are responding separately to those Local Plans.

Moreover, the assumptions about on-going shortfalls in both the Black Country and Birmingham seem to us flawed. In the case of Birmingham, the approved Local Plan (2014) seriously under-estimated windfall housing delivery, as shown by the actual level of windfall development since. It may well be the case that this is repeated in the Black Country, albeit from potentially different sources.

We certainly do not consider other local planning authorities, such as Solihull, should be required to contribute to a claimed Back County 'unmet need' when the data and assumptions and data base for on which the Black Country Plan is based have yet to be fully tested.

Policy CSP2

In general terms CPRE supports the aspirations of Policy CSP2, and particularly the intention to deliver more homes in urban centres. However, the figures given in CSP2 for housing supply appear to us conservative. The Black Country Centres Study, which was based on evidence predating the pandemic, suggests a reduction in the requirement for Retail Space, both for Comparison and Convenience Shopping.

Para 3.36 identifies the need for a new mix of uses, underpinned by housing in centres. CPRE would urge ABCA to review its approach to centres, adopting realistic assumptions about retail need, and whether some managed contraction is required. If this is done in advance of the Regulation 19 Submission it would allow the soundness of the Plan to be tested and could yield additional much needed housing within urban centres as well as making them more viable in the long term.

Policy CSP3

CPRE objects to the inclusion of the Neighbourhood Growth Areas (NGAs) in Policy CSP3 (b). They are identified as 'highly' sustainable. There is no definition of what highly sustainable means, nor can there be when there is no specific test to be applied to this term. In fact, their locations are in some cases in the least accessible areas of the Black Country. Sandhills is at the very edge of the Black Country, as is the proposed Aldridge site. Accessibility by bus is limited because of their locations.

We support CPS3 (g) in regards to Green Belt. However, the key role identified in CPS3 of promoting urban renaissance is undermined by the significant number of sites identified in Green Belt, which also (as we say about Para 3.16) cannot be considered to be locations with defensible barriers.

And, while Green Belt primarily serves a strategic function, we also welcome the emphasis on '*heritage, recreation, agricultural and nature conservation value.*' For many people this represents their local countryside. Moreover, it contains areas of particular value for amenity, such as the Walsall Arboretum, Barr Beacon and Seven Cornfields. The landscape characteristics of the Green Belt are also important along with key areas of nature conservation and geological importance such as Cuckoo's Nook in Walsall.

It is important that the Plan supports on-going work to improve the accessibility of the local countryside, including tree plantings, habitat renewal and footpath improvements, also taking advantage of the network of canals.

We note that while the LUC Green Belt Study graded sites on their impact on Green Belt, these also can have a high landscape impact, especially in areas visible to large numbers of people, such as the sites adjacent to the Arboretum and between the canal and Longwood Lane.

Policy GB1

We support the general policy wording in line with our comments on CSP3. We do not support the large-scale removal of land from Green Belt. Where Green Belt status is removed, a policy of creating physical features to define the boundary is welcome, but this may be difficult when those boundaries are not, themselves, well defined.

In as much as they be complimentary improvements to offset the impact of development are welcome the wording is vague as to how these will be achieved, whether at the site itself or elsewhere. The risk is that such ambitions will fall foul of viability tests and little will actually be done to improve the Green Belt beyond the new site boundary.

Policy GB2

This policy is welcome but should reference the importance of 'openness' and also the 5 Green Belt purposes.

Policy DEL2

CPRE supports this policy as it sets out how development on brownfield sites will be judged. However, the policy should be more positive in its approach to brownfield development. The use of brownfield registers and other tools should be encouraged so that there is a positive encouragement of the use of redundant brown field sites.

As set out in our objection to CSP1, we consider there is considerable scope for further brownfield land to come forward and there is likely to be on-going change and regeneration both in the Black Country centres and in areas of renewal. The Plan needs to support this on-going change, not only to protect the countryside from incursion but to allow for renewal and to ensure the Black Country remains an attractive area to invest in.

Policy HOU1

We object to this policy in line with CSP1 and based on work we commissioned to examine housing need and supply as set out above. This would in our view remove the need for wide-scale and damaging allocations in the Green Belt and reduce the requirement to rely on Duty to Cooperate.

Policy HOU2

CPRE supports the policy on densities in terms of the Minimum Density Standards. However, we would add a further sentence to the Policy requiring developers to provide evidence

that they have sought to maximize the efficient use of land, both in terms of the houses themselves but also in terms of the overall layout of the site. We particularly support an approach which encourages permeable sites, so that walking and cycling in particular are attractive, and do not require lengthy travel round complex road networks.

Policy EMP1

We object to this policy. In line with our comments on CSP1 we would reduce the allocations in Walsall by 15 hectares because of the impact of WAE409 and WAE410 on the Green Belt. Otherwise, we generally support the policy although the level of employment land which will be needed and which will come forward on existing sites needs to be reviewed prior to the Submission Draft publication (the Regulation 19 Consultation). That is because of uncertainties created particularly by the COVID Pandemic in relation to employment land, most particularly offices.

We object to Para 7.10. The level of additional land which needs to be found elsewhere may need to be reduced and further work should be done prior to the Regulation 19 Consultation. The work we commissioned at the time of the first Urban Capacity Study (which seems to remain reasonable) with some small changes of figures in the update, raised the issues of double-counting of employment land need, particularly on proposed sites adjacent to the Black Country in South Staffordshire where the sites would be serving the Black Country but are included as meeting need in South Staffordshire.

Moreover, we have significant concerns about the recent Strategic Employment Site Study which was based on pre-pandemic assumptions.

For both these reasons we consider the figure of 210 hectares of overspill employment need to be likely to be exaggerated.

Policy CEN1

CPRE supports the emphasis on Centres and welcomes the inclusion of residential within the CEN1 (7). As well as meeting housing need and protecting the countryside such an approach will help to ensure the vibrancy of those centres. Particular consideration should be given to widening the socio-economic base of the Black Country, and designing schemes which capitalize on the transport links to the centres, such as access to the Chase Line at Walsall and the West Coast Main Line at Wolverhampton.

However, we believe the policy needs to be more dynamic. In some cases, the best option for centres may be to contract in terms of retail to provide a more balanced and sustainable centre. While the impact of the increased contraction of retail and offices post-COVID remains uncertain, work towards the Regulation 19 consultations should directly address this.

Such an assessment may also specifically lead to a review of Policies CEN2-4 in terms of the balance of development and where any retail contraction is most likely to need to be managed and how. We are not commenting at this stage on that balance.

Policy TRAN1

CPRE supports the aspiration to improve transport across the sub-region. Priority for spending should be on public transport schemes. Expensive road projects, such as The M6 Toll-M54 link road should not be prioritized. We would also strongly oppose any return of the Western Strategic Route (previously called the Western Orbital Route), which was until recently supported by Midlands Connect.

Policy TRAN3

We generally support the aspiration of this policy. However, mitigation should aim not only to address access by sustainable modes but to prioritize it.

Policy TRAN5

We generally support the aspiration of this policy. However, the aim should be to prioritize walking and cycling modes with a specific goal of removing barriers which might prevent use of those modes.

Policy CC1

The policy on Climate Change is in our view inadequate. The policy deals entirely with how developments will individually be designed with climate change in mind. The policy does not seek to influence where development happens. Climate Change needs to be a core element of the plan including a target for reaching Net-Zero in line with the Councils position in terms of the Climate Emergency. It also needs to influence which sites are included in the plan and their transport impact in terms of car-dependency.

Such a policy should be at the core of meeting the Climate Challenge in the Borough. It should also be included as a Core Strategic Policies.

Individual Green Belt Housing sites

The following table includes comments on the sites included in the Neighbourhood Growth Areas in the Green Belt based on the summary in the Plan, as well as details from Google Maps.

The table includes the assessment of the individual sites by LUC (although we are not endorsing their findings), as well as examination of potential boundaries and the closeness to bus routes. It should be stressed that none of the sites have good access to rail or metro and most of the bus routes would be at the extreme end of their service. Congestion on local roads, commuting distances, access to (and pressure on) services and landscape and biodiversity issues are also likely to be present on most of these poorly located sites and local action groups may make more detailed comments on these.

CPRE's conclusion is that these sites are not generally needed to meet any genuine housing need. Many have serious adverse impacts on the Green Belt and the attractive landscape on the rural fringes of the Black Country. We believe most should be removed from the Plan.

We welcome the retention in the Green Belt of the 'Seven Cornfields' Green Wedge that separates Wolverhampton and the northern edge of Dudley Borough. Any development of the Seven Cornfields would have had a particularly high impact on the Green Belt.

It would be consistent with that retention in the Green Belt to drop the majority of the sites which are included in the NGA, and especially those with high landscape and amenity impacts, as well as high impacts on the Green Belt, such as the Walsall Arboretum site.

While we have not specifically identified sites for deallocation at this stage the table suggests most of them are not suitable. CPRE will keep this table of sites with our responses under review. It is anticipated that it will be updated before the Examination stage of the Black Country Plan is reached, with the assistance of local residents.

Green Belt Site	Council Area	Location	Objection	Green Belt assessment in Land Use Consultants' 2019 Green Belt Study
WAM242 (WSA 7)	Walsall	Next to Arboretum	<p>This site is immediately adjacent to the Walsall Arboretum Extension bounded also by Fernleigh Road the Aldridge Road and the Calderfields Golf Club. As well as intruding into the Green Belt it would be highly visible from the Arboretum, sloping upwards from the Arboretum. It is unlikely that planting could mitigate the impact of such a development on the Park. It would significantly increase the developed land around the park impacting on its character in a way that is considered entirely unacceptable. While there is a bus service on the Aldridge Road, the distance to that route would be off-putting making it a largely car-based development. An application to develop this site in 2014 (14/0927/FL) was refused. The reasons for refusal highlight the significant harm to the green belt and the visual impact on the Arboretum. These considerations have not changed. The site is also considered inconsistent with Policy ENV8.</p>	High
WAM231 (WSA 6)	Walsall	Sutton Road	<p>This parcel of land forms approximately half the land bounded by the Canal, Longwood Lane and Sutton Road. It is hard to see how there is a strong defensible boundary with the land immediately adjacent to it. The site is low-lying and potentially boggy. It currently has a footpath across it which links the far end of the Arboretum with Aldridge Airfield so it is part of an important leisure</p>	High

			network, as well as an important natural site being immediately adjacent to the Canal. The houses would be visible not only to residents of Sutton Road but to the regular walkers and cyclists along the canal towpath and the path that bisects from the Longhorn Pub to the Arboretum. This is considered a sensitive location which should not be developed. The site is also considered inconsistent with Policy ENV8 both directly because of the existing footpaths and indirectly because of its location close to the Canal.	
WAM234/250 (WSA 8)	Walsall	Streetly	The site is on land between Pheasey and Streetly and bisects the Green Wedge gap between them contrary to the aims of Green Belt Policy. There is no clear boundary with the Green Belt land towards Barr Beacon. The site is currently at the edge to the Great Barr Conservation Area. However, Walsall Council is consulting on reducing the size of the Conservation Area dramatically so its boundaries are much closer to Great Barr Hall. This would reduce the protection of the Green Belt beyond the site and make it susceptible to incursion towards the Beacon itself. The impact on the Grade II listed Doe Bank Farm is also of concern, and specifically in relation to Policy ENV5.	High
WAM230/246/254 (WSA 9)	Walsall	Pacific Nursery	The site encompasses several parcels of land in the Green Belt, including Pacific Nursery Garden Centre. It is in an area poorly served by public transport. However, it has well defined Green Belt boundaries in the road and railway line.	Moderate-High

WAM237 (WSA 3)	Walsall	Aldridge	This site is a Mineral Safeguarding Area so would require prior extraction. It is at the very edge of the conurbation with no clear boundary towards Lichfield. Further land beyond the site is also identified as an MSA so this site would be potentially vulnerable to further housing development. There is limited bus access nearby (Hourly 35a) and extending into the site may not be viable or desirable.	Moderate (but Very High in MSA Area beyond)
WAM235 (WSA1)	Walsall	Sandhills	This site has a long planning history and has been rejected for development since the Walsall Unitary Development Plan in the 1990s. It would be a significant incursion into the Green Belt beyond the very edge of the conurbation. Because of the slope of the land, it would be highly visible. It is poorly served by public transport with limited bus services extending beyond the edge of the conurbation on the Lichfield Road. Bus routes into the development are suggested but may well not be viable in the long run given its location. The site has no clearly defined boundary towards Lichfield except for the boundary between the two local authorities. The boundary of the Lichfield Road is somewhat illusory. There is a short amount of ribbon development on the road itself but beyond that is further Green Belt.	High
WAM238/240 (WSA 2)	Walsall	High Heath/Pelsall	This is sited on land beyond Mob Lane, High Heath and is in a Minerals Safeguarding Area so would require prior extraction and there may be some remediation requirements. The Green Belt boundary is not clearly defined.	High

WAM236 (WSA 5)	Walsall	Pelsall	This is open fields on the very edge of Pelsall. There does not seem to be a clear boundary either on the Walsall or Cannock Chase sides of the boundary. It is reasonably well served by bus.	High
WAM232 (WSA4)	Walsall	Bloxwich	The site is not well located beyond the edge of Bloxwich, so with less frequent bus services, and is adjacent to Yieldsfield Farm (a Grade II listed building) which means it threatens to contravene Policy ENV5. Although it is on the very edge of the Black Country, there does not appear to be a strong Green Belt boundary along that line.	High
WOH 262/263/264/271	Wolverhampton	Wednesbury	The land is largely agricultural. It is unclear that there is a clearly defensible Green Belt boundary, apart from the South Staffordshire District boundary. There is, therefore, a risk of further green belt loss as far as Blackhalve Lane. Linthouse Road is, however, well-served by public transport.	Low
WHO 257/258/259/260	Wolverhampton	Bushbury	The sites run along the edge of Bushbury. There is currently no clear boundary to the West of the site and they would have an impact on the Northcote Country Park, which is also an area with nature conservation value, as well as the settings of the Grade II listed Northcote Farm and Moseley Old Hall further north. There is potential for infill development to the North in South Staffordshire between the site and the M54. The site would be near the hourly 65 bus route, but it is likely to be largely car dependent. It is also likely to be contrary to Policy ENV5 and ENV8 because of the parkland and historic buildings whose setting would be affected.	260 Moderate/Others Very High

DUH 208	Dudley	Kingswinford	<p>This site is agricultural land beyond the north of the eastwards expansion of Wall Heath. The area immediately to the north is designated not only as Green Belt but as high historic landscape value. Development of this area of land would affect the setting of the Grade II listed Holbeche House (clearly an issue in relation to Policy ENV5). This property is an important historic site as the house where some of the 1605 Gunpowder Plot conspirators were arrested. While there is a bus service, the site would generate significant extra traffic on the A449 which would be used as its main access. The A449 was formerly a trunk road and continues to be a Primary Route (green signs), the main road between Worcester and Wolverhampton. It would be harmful to the purpose of the A449 as a Primary Route to develop new housing adjacent to it, slowing down existing traffic, especially at peak hours, and causing road safety risks.</p>	Moderate-High
DUH213	Dudley	Kingswinford Triangle	<p>This site is agricultural land. It is on a highly visible rise. There is a definite western boundary, the A449.</p> <p>While there are bus services to the edge of the site, it would generate significant extra traffic on the A449, which would be used by much of the traffic that any housing on this land would generate. The A449 was formerly a trunk road and continues to be a Primary Route (green signs), the main road between Worcester and Wolverhampton. It would be harmful to the purpose of the A449 as a Primary Route to develop new housing adjacent to it, slowing down existing traffic, especially at peak hours, and causing road safety risks.</p>	Moderate-High

			There is also a risk of expansion outwards along or beyond the A449, raising concerns about the return of the controversial, damaging and twice-rejected past plan for a Western Strategic Route.	
DUH 206/207/209	Dudley	Stourbridge Railway Line	This site is on farmland on the edge of Pedmore. it extends towards Hagley with no clearly defensible boundary protecting the narrow gap between Hagley and Pedmore. The nearest bus service is at Redlake Lane suggesting it would not be well situated for use by Public Transport. There is a risk that this site could end up joining Stourbridge and Hagley by later infill proposals.	Moderate-High