

PLANNING APPLICATION NUMBER:P11/1274

Type of approval sought	Outline Planning Permission
Ward	Quarry Bank & Dudley Wood
Applicant	Mr S. Jones, Aube Properties Ltd
Location:	FORMER KUEHNE AND NAGEL UK, SALTWELLS ROAD, NETHERTON, DUDLEY, WEST MIDLANDS, DY2 0BY
Proposal	OUTLINE APPLICATION FOR THE DEMOLITION OF EXISTING BUILDING AND ERECTION OF 70 NO. DWELLINGS (ACCESS TO BE CONSIDERED)
Recommendation Summary:	APPROVE SUBJECT TO CONDITIONS AND 106

SITE AND SURROUNDINGS

1. The site measures 1.93 hectares and comprises a large warehouse unit used for storage and distribution uses (9,160 square metres). The unit is rectangular and runs the full length of the site. There are some smaller ancillary buildings located within the south-west corner of the site. The industrial unit is sited immediately to the south-west of Saltwells Lane and to the north-west of Saltwells Road. The servicing and parking associated with the unit is positioned along the south-western boundary of the site.
2. The site is elevated above Saltwells Road with a retaining wall and metal fencing along with an embankment, having been built at the back edge of the pavement adjoining the highway. The retaining wall that fronts Saltwells Road measures 2.66m tall at its highest point. Vehicular access into the site is provided via Saltwells Lane.
3. The site itself is relatively flat. Beyond the site to the south-west is a woodland and this lies significantly lower than the site itself adjacent to the Black Brook.

4. The north-east and south-west boundaries of the site immediately adjoin Saltwells Local Nature Reserve. The boundaries of the nature reserve that immediately adjoin the site are characterised by a number of mature trees and footpaths that provide public access from Saltwells Lane into the nature reserve.
5. Immediately adjoining the western boundary of the site are four residential dwellings (1-4 Saltwells Lane), Saltwells Inn and the car park for Saltwells Nature Reserve. These uses are also accessed from Saltwells Lane. Located close to the south western boundary of the site is a stream (Black Brook).
6. The site lies within an area that was previously mined and there are three disused mineshafts within the site (two located centrally within the site and one positioned on the Saltwells Road frontage).
7. The existing employment unit site is surrounded by areas of public open space on most sides of the site in the form of the local nature reserve. The wider area to the east of the site is characterised by post-war residential development largely characterised by terrace and semi-detached properties.

PROPOSAL

8. The outline proposal seeks the demolition of the existing industrial buildings and the redevelopment of the site to accommodate 70 dwellings. All matters are reserved for future consideration with the exception of means of access.
9. The proposed access would include the widening of a section of Saltwells Lane to 7.3m at the junction with Saltwells Road and the provision of an emergency access route linking with Saltwells Road. The existing retaining wall adjoining Saltwells Road would be removed and the embankment remodelled to allow for the provision of a suitable visibility splay. New road markings and an anti-skid surface will also be laid on part of the north carriageway running along Saltwells Road.

10. Details have been submitted regarding the proposed alignment of Saltwells Lane with the provision of a 2 metre wide footpath running along the southern boundary of the lane, the provision of a 7.3m carriageway for the first 113 m of Saltwells Lane which then narrows to a 5.5m wide carriageway. A 1m wide grassed verge is proposed to run along the northern boundary of the improved highway. Traffic calming would be required along a 40m stretch of the 7.3m carriageway.

11. Whilst layout is a reserved matter, the Design and Access Statement puts forward some general development principles that would be expected to be included within a detailed scheme:

- Dwellings to front on to all public areas including Saltwells Lane and Saltwells Road.
- Provision of permeable and accessible development that encourages cycling and walking.
- Respect the character of the surrounding area – notably built form and building lines.
- Provide a sustainable community with a mix of dwellings.
- Up to 70 dwellings.
- Mixed community of largely 1 to 3 bedroom dwellings with a limited number of 4 to 5 bedroom units.
- A density of between 30-35 dwellings per hectare to reflect the character of the area.
- Removal of the retaining wall structure and its replacement with a banked slope.
- Parking provided on plot where possible.
- Appropriate treatment of disused mineshafts.
- Majority of dwellings to be 2 storeys in height with some 2.5 and 3 storey development to be located within key building frontages.
- Predominantly two storey dwellings along the Saltwells Road frontage given its elevated position.
- Provision of trees and planting within the site to enhance and connect with Saltwells Nature Reserve. The use of native species.

- Materials of the proposed dwelling should reflect houses within the context of the site.
 - The appearance of the dwellings should reflect the 1930's style of the surrounding housing. A standardised house type should be avoided and new styles based on local distinctiveness should be created.
12. The Design and Access Statement includes a Development Framework Plan that sets out how the broad principles for the future development should be delivered on site. This shows the creation of a road around the perimeter of the site and with development of three blocks of housing development interspersed with minor access roads. The scheme would include the provision of a green link connecting the south-western and north-eastern parts of the Saltwells Local Nature Reserve as well as making reference to how the proposed development could link with the existing footpath network within the local nature reserve to the north-east of the site. The Development Framework plan also proposes a soft landscape buffer fronting Saltwells Road and an internal pedestrian/cycle link connecting the development blocks.
13. The application has been supported by a number of technical reports including:
- Design and Access Statement
 - Planning Statement
 - Flood Risk Assessment
 - Ecological Survey
 - Transport Assessment
 - Land Quality Assessment
 - Economic Viability Assessment
 - Market Assessment

HISTORY

14. Numerous applications have been determined with respect to the erection of industrial units and associated industrial development reflecting the employment nature of the site from the 1950's to the 1990's.

PUBLIC CONSULTATION

15. The application was advertised by way of neighbour notification letters being sent to the occupiers of nearby properties. An advertisement was also placed in the local press and a site notice was displayed on site. Three letters were received from local residents raising the following material planning considerations:

- Increase in traffic.
- Noise and pollution resulting from additional traffic.
- Lack of parking.
- Concerns regarding the potential impacts of the development whilst under construction upon access to Saltwells Inn and the proposed design of Saltwells Lane only being widened in part.
- Concern regarding the principle of erecting housing that would be surrounded by the nature reserve resulting in an increase in fly tipping into the reserve.
- The height of the existing industrial unit provides some privacy whilst walking through the local nature reserve, its redevelopment to housing will mean that it would be like walking through a housing estate.

OTHER CONSULTATION

16. Group Engineer (Development): No objections to the principle of residential development on the site subject to the proposed development ensuring the delivery of the suggested road improvement works to Saltwells Road and the provision of pedestrian/cycle improvements within the development.

17. Head of Environmental Health and Trading Standards: No objections subject to contaminated land conditions, the provision of an electric vehicle charging point for each dwelling in order to mitigate against an increase in trips associated with the proposed development and the potential adverse impact upon air quality and a condition requiring the submission of a scheme to protect residents in the proposed dwellings from noise from road traffic on Saltwells Road.

18. The Coal Authority: No objection subject to a pre-commencement condition requiring site investigation works to be undertaken in order to confirm former coal mining activities with a requirement for remedial measures to be completed prior to the commencement of the residential development.
19. Environment Agency: Awaiting comments which will be reported in the pre-committee notes.
20. West Midlands Police: No objection subject to a condition requiring the detailed scheme to be in accordance with Secured by Design principles.
21. West Midlands Fire Service: No objections

RELEVANT PLANNING POLICY

National Planning Guidance

22. The National Planning Policy Framework (NPPF) sets out the Governments planning policies for England and how these are expected to be applied. The NPPF is a material consideration in planning decisions, but does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved.
23. The NPPF advises that the purpose of the planning system is to contribute to the achievement of sustainable development and to proactively drive and support economic development to deliver homes, business, and industrial units, infrastructure and thriving local places that the country needs.
24. Paragraph 22 of the NPPF states that:

“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no

reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

25. Section 6 of the NPPF relates to the delivery of new homes stating at paragraph 46 that local planning authorities should “*boost significantly the supply of housing.*”
26. Paragraph 49 of the NPPF reaffirms the need for housing applications to be considered in the context of the presumption in favour of sustainable development.
 - Technical Guidance to the National Planning Policy Framework
 - Circular 11/95 – The Use Conditions in Planning Conditions
 - CIL Regulations

Black Country Core Strategy (BCCS) 2011

- CSP2 Development Outside the Growth Network
- CSP3 Environmental Infrastructure
- CSP4 Place Making
- DEL1 Infrastructure Provision
- DEL2 Managing the Balance Between Employment Land and Housing
- HOU1 Delivering Sustainable Housing Growth
- HOU2 Housing Density, Type and Accessibility
- HOU3 Delivering Affordable Housing
- TRAN2 Managing Transport Impacts of New Development
- TRAN4 Creating Coherent Networks for Cycle and for Walking
- ENV 1 Nature Conservation
- ENV 5 Flood Risk, Sustainable Drainage Systems and Urban Heat Island
- ENV 6 Open Space, Sport and Recreation
- ENV 8 Air Quality

Unitary Development Plan (UDP) 2005

- DD1 Urban Design
- DD4 Development in Residential Areas
- DD10 Nature Conservation and Development
- LR1 Open Space
- NC1 Biodiversity
- NC6 Wildlife Species
- NC9 Mature Trees
- NC10 The Urban Forest
- SO2 Linear Open Space
- SO3 Access and Enhancement of Green Belt and Linear Open Space
- EP6 Light Pollution
- EP7 Noise Pollution

Supplementary Planning Guidance/Documents

- Draft New Housing Development Supplementary Planning Document
- Planning Obligations Supplementary Planning Document
- Design for Community Safety Supplementary Planning Guidance
- Parking Standards Supplementary Planning Document
- Nature Conservation Supplementary Planning Document

ASSESSMENT

30. The main issues are

- Principle
- Viability
- Access
- Flood Risk
- Ground Conditions
- Nature Conservation

- Development Principles
- Planning Obligations
- National Homes Bonus
- Other Issues

Principle

31. The application site was designated as a Local Employment Area as part of the Dudley Unitary Development Plan. Policy EE2 of the Dudley Unitary Development Plan is not a saved policy and the site has not been designated as a High Quality Strategic Employment Area or Local Quality Area within the Black Country Core Strategy (BCCS). On this basis, there is no longer an over-arching policy that seeks to retain the site in employment use *“to ensure a sufficient stock of employment land to meet demand and support the growth and diversification of the economy”*.
32. Policy DEL2 of the BCCS sets out how the sub-region should ensure that a balance is maintained between delivering sufficient employment and housing land and provides a mechanism for the release of surplus land for housing, to ensure that this is done without the unnecessary blight of employment land and harm to the amenity of new residents.
33. In applying DEL2, the evidence required for a site such as this would need to be sufficient for the applicants to:-
 1. Ensure satisfactory arrangements for the relocation of existing occupiers;
 2. Ensure that the development does not adversely affect the operation of existing or proposed employment uses;
 3. Ensure that the site is no longer viable and required either for employment use, including relocation of businesses displaced from sites released to other uses, or for other employment generating uses;
 4. Demonstrate a comprehensive approach, making best use of available land and infrastructure and not prejudicing existing and neighbouring uses.
34. In this case, points 2 and 4 (above) can be met, given that this industrial site is proposed to be comprehensively redeveloped with no other existing industrial

premises nearby that may have their future viability under threat from potential concerns raised by future occupiers of this proposed development on amenity issues.

35. On point 1, it is noted that the existing tenants are an international company (“a leading logistics company”) with a portfolio of UK sites. The site currently employs 34 people. The employees would be re-located to a new site recently opened by the company at Midpoint Park, Minworth. The applicant plans to retain the existing operation of the current site (Drinks Logistics and Technology) in the locality subject to finding a more suitable site.
36. With regard to point 3, the premises are old and of outdated construction that has reached the end of its useful life and the applicants have provided a marketing assessment to show that *“the site is not well located or particularly large therefore its appeal to both existing and potential users is limited.....the site in its current form is nearing the end of its economic life and would no longer be capable of providing an appropriate standard of accommodation for modern business or industrial use.....the site is fundamentally unsuitable in terms of its location, age and condition for either warehouse/distribution or industrial/manufacturing...there is limited prospect of the disposal reuse of the site in its existing condition and that partial or full redevelopment for industrial purposes is not viable in market terms”*.
37. Comprehensive evidence has been submitted which has demonstrated that the site would be difficult to re-let or redevelop for employment purposes. It is considered that, in this instance, the fact that the site has not been formally marketed is not a fundamental issue in showing that the site is no longer viable for employment use and that DEL2 has been effectively applied.
38. In light of the above, the applicant has demonstrated that the site would be appropriate to be released for housing development, particularly given that the site is an isolated industrial site which would be comprehensively redeveloped and which is evidently no longer fit for purpose and not easily accessible. The proposed development resulting in the loss of the existing employment facility would therefore be in accordance with Policy DEL2 of the BCCS.
39. Further credence to the release of this employment site for housing is given when the site’s status and suitability as a housing site is factored in. The site is included as a

SHLAA site - the Strategic Housing Land Availability Assessment (SHLAA) (March 2010). The SHLAA formed part of the evidence base for the progression of the Local Development Framework (LDF), which included the BCCS. Within the SHLAA, the site is referenced as Site 117 and scored as “deliverable” i.e. offers a reasonable prospect that housing will be delivered on the site within 5 years.

40. The site is included within the 5 year Housing Land Supply for the Borough. Paragraph 2.73 of the BCCS states that *“it will be necessary to rely on existing housing commitments and identified SHLAA sites during the early years to enable an appropriate lead in time for larger housing sites”*.
41. The environmental improvements which can be realised with the site’s redevelopment for housing, including the removal of hard standing and the provision of garden space (according to the Flood Risk Assessment (FRA), the area of hardstanding will be reduced from 94% to 70%) and other potential “green uplifts” which would respond to the site’s location, surrounded on three sides by Saltwells Local Nature Reserve (LNR) and within an area of designated Linear Open Space (LOS), can also be factored in favouring the redevelopment of this site for residential purposes.

Viability

42. In line with Policy HOU3 of the BCCS, the Council will seek to secure 25% affordable housing on site. On sites where 25% affordable housing is proven not to be viable, the maximum proportion of affordable housing will be sought which will not undermine the development’s viability, subject to achieving optimum tenure mix.
43. Lengthy and detailed discussions have been on-going with the developer for over a year regarding the potential viability of the development. An Economic Viability Assessment has been prepared by the applicant’s surveyor in order to inform the potential delivery of affordable housing.
44. The submitted economic viability assessment indicates that due to the high level of remediation required a contribution to fund affordable housing would affect the profitability of the scheme.
45. For the purposes of completing the viability exercise, it has been assumed that the development could accommodate 70 no. dwellings. The Head of Property and

Valuation has reached agreement with the applicant's surveyor on the Gross Development Value, Net Development Value and estimated costings with respect to demolition and site stabilisation works having regard to historic mining activities likely to be present on the site.

46. There were some concerns that the size of the units proposed would be too large and therefore there is an over-estimate of build costs associated with the development of the site. Once a more realistic build cost was applied to the appraisal to reflect the likely size of dwellings that would be delivered the Head of Property and Valuation confirms that it would not be viable to deliver 25% affordable housing on site but confirms that a reduced provision could be provided of 10%. This would equate to the delivery of 7 units based on a 70 unit scheme retaining the 60:40 tenure split as set out above. The applicant has agreed to the provision of 10% affordable housing based on the findings of the viability report prepared by the Council's surveyor.

Access

47. The proposed access would include the widening of a section of Saltwells Lane to 7.3m at the junction with Saltwells Road and the provision of an emergency access route linking with Saltwells Road. The existing retaining wall adjoining Saltwells Road would be removed and the embankment remodelled to allow for the provision of a suitable visibility splay. New road markings and an anti-skid surface will also be laid on part of the north carriageway running along Saltwells Road.
48. Details have been submitted regarding the proposed alignment of Saltwells Lane with the provision of a 2 metre wide footpath running along the southern boundary of the lane, provision of a 7.3m carriageway for the first 113 m of Saltwells Lane then narrowing to a 5.5m wide carriageway. A 1m wide grassed verge is proposed to run along the northern boundary of the improved highway. Traffic calming would be required along a 40m stretch of the 7.3m carriageway.
49. Group Engineer (Development) raises no objection to the proposed means of access into the site and supports the highway infrastructure improvements that would be associated with the new means of access. In this regard, the proposed development

would be in accordance with Manual for Streets and saved Policy DD4 of the Dudley Unitary Development Plan.

50. Any subsequent reserved matters application would need to provide for the satisfactory movement of pedestrians and cyclists within the development; provide sufficient off street parking to meet the parking demands of the proposed development in accordance with current parking standards and consideration of the design of parking areas to remove an over reliance on rear courtyards and on-street parking.

Flood Risk

51. The applicants have submitted a Flood Risk Assessment (FRA). This concludes that, with particular regard to the Blackbrook (40 metres south west of the site), that the potential flood risk for the site is low. This is since the site lies 10 to 12 metres higher than the watercourse and the applicant would ensure the provision of flood prevention measures within a detailed scheme including the use of appropriate building heights and permeable surfaces.
52. The FRA and Design and Access Statement do not make any reference to the potential incorporation of Sustainable Urban Drainage Systems (SUDS) within the scheme. To comply with Policy ENV5 of the BCCS, applicants "*should incorporate SUDS unless it would be impractical to do so*". The use of SUDS on this site could be designed as to benefit nature conservation reflecting the sites juxtaposition with the adjoining Local Nature Reserve as well as delivering a sustainable form of development. The use of SUDs could be conditioned as part of any planning approval.

Ground Conditions

53. The Land Quality Assessment Desk Study Report by Baynham Meikle Partnership dated April 2010 (incorporating historical site investigation reports by GeoDelft) submitted in support of the application has been reviewed. A subsequent outline remediation strategy has been submitted by the applicant to provide further details on issues relating to ground conditions and contamination. Subject to conditions requiring the carrying out of additional site investigation works and submission of a

full remediation strategy being agreed prior to the development commencing the proposed development would be in accordance with the NPPF and saved Policy UR9 of the Dudley Unitary Development Plan.

Air Quality

54. Additional trips generated by the development would lead to an incremental and cumulative increase in pollutant levels within Dudley Metropolitan Borough. Levels of one of these pollutants, nitrogen dioxide, already exceed government targets at several locations. This has triggered the declaration of the whole of the borough as an Air Quality Management Area and the subsequent adoption of the Council's Air Quality Action Plan. The Council needs to mitigate any transport related increases in nitrogen dioxide to avoid further deterioration in pollution levels and, wherever possible, improve air quality to meet EU emission limits.

55. On site mitigation of these impacts in the form of the provision of an electric vehicle charging point for each dwelling would mitigate against this impact. The applicant has agreed to provide this and therefore the proposed development would be in accordance with the Parking Standards SPD.

Noise

56. The application site is relatively isolated and future occupants are unlikely to be affected by noise from any commercial or industrial premises. However, the front of the site is adjacent to the busy Saltwells Road so occupiers in dwellings fronting that boundary will be exposed to road traffic noise. It would therefore be necessary to incorporate a scheme of road traffic noise mitigation into the development once the final layout is determined. This can be secured by condition and the proposed development would therefore be in accordance with saved Policy EP7 of the Dudley Unitary Development Plan.

Nature Conservation

57. The Natural Environments and Rural Communities (NERC) Act 2006 S40 states that:

“Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.”
58. It is therefore a legal requirement for Councils to conserve and enhance biodiversity, where possible, including through the planning system.
59. The NPPF requires any negative impacts upon a wildlife site or protected species to be avoided wherever possible. These negative impacts can come either from onsite or offsite developments. Where it is not possible to avoid the impacts they must be minimised and fully mitigated for to neutralise their effects. Additional enhancement works should then be carried out to produce a net gain for the nature conservation interest.
60. Circular 06/2005 which remains a material consideration, states in paragraph 99 that where protected species are suspected, adequate levels of survey work and assessment should be provided before any planning application is approved. It is therefore Dudley MBC's policy (as stated in the adopted Nature Conservation Supplementary Planning Document) to require these before validating the planning application.
61. The borough is within the Birmingham and Black Country Nature Improvement Area. This is one of a small number of areas across the country where the Government is seeking to drive forward significant landscape scale nature conservation improvements. The NPPF expects Planning authorities to aid in its delivery through its plans and development approvals.
62. The site is dominated by industrial units and associated hardstanding. It includes Saltwells Lane which forms its northern and eastern boundary. Its north western boundary includes an area of young and semi-mature trees forming a north south link

between parts of the adjacent woodland. The sites southern boundary includes a thin fringe of soft landscaping which includes some small trees.

63. The site is part of a pinch point in a sub-regionally important wildlife corridor. The site is bordered by Saltwells Local Nature Reserve (LNR) which forms the majority of the site's perimeter. Saltwells LNR is a UNESCO Man and the Biosphere Reserve. The development site is also completely designated as Linear Open Space (LOS).
64. To the south of Saltwells Road is Mushroom Green, Blackbrook SLINC, Mushroom Green Farm, North SLINC and Saltwells, Mushroom Green LNR. Just to the north west of the site along Saltwells Lane is the LNR car park.
65. Local policy complements the above national policy requirements. The site is within a wildlife corridor and designated as Linear Open Space (LOS) (UDP Policies SO2 Linear Open Space and SO3 Access and Enhancement of Green Belt and Linear Open Space). This requires development to positively improve the area for the connectivity of both wildlife and people.
66. Doulton's Claypit Site of Special Scientific Interest (SSSI), a nationally important geological site, is 50m to the north within Saltwells LNR. A section of the woodland adjacent to the north east boundary, within Saltwells LNR, is recognised as Ancient Woodland. Part of the grassland within Saltwells LNR, 12m to the North West of the site boundary, is acknowledged to be Coastal and Floodplain Grazing Marsh, a Habitat of Principle Importance within the Natural Environment and Rural Communities Act 2006 and both a national and local Biodiversity Action Plan priority habitat.
67. Many protected species are known in the local environs including Common pipistrelle, Noctule and Brown long-eared bats, Badgers and Great crested newts.
68. The proposal would remove the industrial premises and replace it with a maximum of 70 dwellings. The access along Saltwells Lane would be improved. The north western area of trees would be removed. The submitted Development Framework

Plan 160211 01 v3 that forms part of the Design and Access Statement would deliver the creation of a green link to provide a wildlife corridor linking the site in terms of biodiversity with open space to the south-west and Saltwells Nature Reserve to the north-east. The applicant submitted a revised Ecological Appraisal in July 2012 that considered the most probable off site impacts of the proposed development supported by an amended Development Framework Plan. This report and plan provide tools to ensure that any harmful impacts of the proposed scheme upon biodiversity are mitigated against at the outline stage with any subsequent reserved matters application being able to deal with on-site enhancement.

69. The revised Development Framework would provide a positive form of development to limit the impacts of any development upon nature conservation. The main basis for the redevelopment of the site would be the creation of a perimeter block road. This has a number of benefits and would avoid the opportunity for gardens to encroach upon the nature reserve, would minimise fly tipping from gardens, provide increase security with respect to the nature reserve and facilitate the control over light pollution.
70. The proposed change of use from industrial to residential use would also provide an opportunity to increase the amount of green space within the site and of introducing sustainable drainage techniques to facilitate the control of drainage to ensure that the development would not have an adverse impact upon biodiversity.
71. In terms of protected species, the proposed development would not have particularly specific harmful impacts and therefore mitigation measures are not necessary.
72. The proposal would break up the development pattern of the site allowing increased public access, especially if full footpath access is provided along Saltwells Lane. It would also break up the hardstanding present and provide greenspace in the form of gardens and some public landscaping (Development Framework v3, Capita Symonds).
73. The Development Framework v3 prepared by Capita Symonds would set the principles of a subsequent reserved matters approved. The plan proposes tree

planting along the north eastern part of the site. This would support more mobile species to move into the site. The landscaping proposed running through the development between blocks R1 and R2 is also supported however its thin character will significantly limit its use by wildlife. The planting along the southern boundary of the site would have the potential to provide habitat improvements to encourage species to move from the north and south parts of the LNR.

74. The removal of the woodland strip along the north-west boundary would be a negative impact which would need offsetting onsite by additional compensatory planting (ENV1 Nature Conservation). This could be secured by condition with ecological mitigation and compensation required to be delivered at the Reserved Matters stage.
75. If demolition and construction are undertaken using appropriate commonplace sympathetic methods (e.g. providing ramps in trenches overnight to enable any badgers falling into them to escape) it is unlikely that protected species would be harmed (ENV1 Nature Conservation and UDP Policy NC5 Protected Species).
76. The single exception to this is bats. The Ecological Report recommends that additional bat survey work is carried out prior to demolition. The consultants consider there to be low bat roosting potential in the buildings but conclude that due to its location, next to high quality foraging habitat, that additional survey work is needed at a later stage. The Council is usually not permitted to condition initial protected species surveys however given the special circumstances in this case (low suitability and extent of features, outline consent for limited consideration of matters etc) this is considered to be a suitable approach. This can be conditioned.
77. The main impacts (other than tree removal as discussed above) relate to offsite impacts, both during construction and operational phases. The general form of the proposed layout as set out by the Development Framework Plan is supported in that it uses roadways to provide a secure boundary to the Local Nature Reserve. It is anticipated that this would limit the risks of the disposal of garden waste and adverse possession of open space.

78. Perhaps the issue of singular most concern will relate to an increase in visitor pressure either directly via the additional residents using the site or the changes in patterns of use created by the development (ENV1 Nature Conservation, UDP Policies DD10 Nature Conservation and Development, NC1 Biodiversity and NC6 Wildlife Species) These can include opportunities to establish unregulated desire lines, new pockets of disturbance and antisocial behaviour and localised impacts of increased dog walking.
79. Detailed discussions have been carried out with the applicant, the Council's Countryside Manager and Saltwells Senior Warden to ensure that the proposed development has regard to the increase of recreational use of the nature reserve. The applicant has agreed to an off-site contribution towards footpath improvements that link in and connect with the site. This would need to be secured by a S106 Agreement and would ensure that the proposed development mitigates against the impacts of additional visitors using the nature reserve, would ensure that public access to, through and within the Linear Open Space is protected and would ensure that the new development would link with existing walking networks.
80. Subject to the implementation of the form of development as set out in the Development Principles v3 plan and the implementation of on-site mitigation, compensation and enhancement secured by condition and a planning obligation to secure off site footpath improvements, the proposed development would not raise any significant nature conservation concerns to warrant the refusal of planning permission and would be in accordance with BCCS Policy TRAN4, ENV1 and saved Policies SO3, NC1, NC5, NC6 and DD10 of the Dudley Unitary Development Plan.

Development Principles

81. The application is submitted in outline with means of access submitted for consideration and all other matters reserved for future consideration. The Design and Access Statement sets out the intended form and nature of the proposed development and the development principles associated with any reserved matters application.

82. The development principles would be as follows:

- Dwellings to front on to all public areas including Saltwells Lane and Saltwells Road.
- Provide a permeable and accessible development which encourages walking and cycling.
- Respecting the local character of the area in terms of its built form.
- Provision of wildlife link connecting the site to open space to the east and west.
- Landscaped southern boundary that would also be suitable as ecological enhancement.
- Respect the established building lines along Saltwells Road in relation to development that fronts the main road.
- Removal of the existing retaining wall structure and introduction of a banked slope along the southern boundary of the site.
- Provision of on-plot parking.
- Development adhering to Secured by Design Principles.
- Majority of houses will be 2 storeys in height with some 2.5 and 3 storey development located within key building frontages.
- Robust landscaping scheme to ensure the proposed development would be assimilated into the area and to ensure the delivery of on-site nature conservation mitigation, compensation and enhancement.
- A density of between 30-35 dwellings per hectare.

83. The development principles set out above would ensure the creation of a well-designed development that, subject to consideration of its detailed design would relate to its local context and enhance the character of the area, notwithstanding that public objections received to the development are addressed at paragraph 100. The Development Framework Plan v3 and the Design and Access Statement can be conditioned to ensure that the development principles for the future development are carried forward to the reserved matters stage. This would ensure compliance with Policies CSP4 and HOU2 of the BCCS and saved Policies DD1 and DD4 of the Dudley Unitary Development Plan and the New Housing Development SPD.

Planning Obligations

84. Black Country Core Strategy Policy DEL1 'Infrastructure Provision' sets out the adopted policy framework for Planning Obligations within Dudley and the Planning Obligations SPD provides further detail on the implementation of this policy; these policy documents were prepared in accordance with national legislation and guidance on planning obligations.

85. Policy DEL1 requires all new developments to be supported by sufficient on and off-site infrastructure to serve the development, mitigate its impact on the environment, and ensure that the development is sustainable and contributes to the proper planning of the wider area.

86. The obligations potentially triggered according to the Planning Obligations SPD are:

- 25% Affordable Housing
- Education
- Libraries
- Transport Infrastructure Improvements
- Open Space, Sport and Recreation
- Nature Conservation Enhancement
- Public Realm
- Public Art
- Local Employment Strategy

- Air Quality

87. In determining the required planning obligations on this specific application the following three tests as set out in the CIL Regulations, in particular Regulation 122, have been applied to ensure that the application is treated on its own merits:

- (d) necessary to make the development acceptable in planning terms;
- b) directly related to the development;
- c) fairly and reasonably related in scale and kind to the development.

88. Following consideration of the above tests the following planning obligations are required for this application:

Off-Site Provision (to be secured by S106 Agreement)

- Footpath Improvements to Saltwells LNR £2,365.72
- Affordable Housing 10% provision on-site

On-Site Provision (to be secured by condition)

- Nature Conservation £10,422 or equivalent
- Public Art 1% of development costs
- Air Quality EV charging point per dwelling
- Local Employment Strategy

89. It is considered that these contributions meet the necessary tests as stated above in that they contribute to the delivery of a sustainable development, are being provided directly on the development site itself and are deemed to be in scale and kind to the proposed development.

90. This development complies with the requirements of BCCS Policy DEL1 and the Planning Obligations SPD.

91. The applicant has agreed to the payment of these onsite/offsite planning obligations at the date of agenda preparation.

New Home Bonus

92. Clause (124) of the Localism Act states that: Local planning authorities are to have regard to material considerations in dealing with applications including any local finance considerations, so far as material to the application. A “local finance consideration” means a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown. This may be taken to cover the payment of New Homes Bonus, or sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy.
93. The New Homes Bonus is designed to create an effective fiscal incentive to encourage local authorities to facilitate housing growth. It will ensure the economic benefits of growth are more visible within the local area, by matching the council tax raised on increases in effective stock.
94. The Bonus will sit alongside the existing planning system and provides local authorities with monies equal to the national average for the council tax band on each additional property and paid for the following six years as a non-ring fenced grant. In addition, to ensure that affordable homes are sufficiently prioritised within supply, there will be a simple and transparent enhancement of a flat rate £350 per annum for each additional affordable home.
95. Whilst the clause makes it clear that local finance matters are relevant to planning considerations can be taken into account; it does not change the law in any way. It is not a new basis for planning policy and it remains unlawful for planning permissions to be “bought”.
96. This proposal would provide 70 houses generating a grant of 70 times the national average council tax for the relevant bands plus an enhancement payment of £2,450 (7 units times £350) for affordable housing provision per annum for 6 years.

97. Whilst this is a significant sum of money the planning merits of the proposal are acceptable in any event and therefore this is not accorded significant weight.

Other Issues

98. The proposed development would result in a net density of between 30 and 35 dwellings per hectare. This would broadly be in accordance Policy HOU2 of the BCCS, which seeks to achieve a minimum net density of 35 dwellings per hectare. The density of the reserved matters application may need to be further reduced in order to enable the proposed development to successfully integrate into its sensitive environmental setting and to ensure the provision of suitable off street parking.
99. Policy ENV7 of the BCCS sets a requirement for major developments to incorporate generation of energy from renewable sources “to off-set at least 10% of the estimated residual energy demand of the development on completion”. This can be secured by condition.
100. Issues raised by residents in terms of the scheme not providing sufficient parking, the design of the internal road layout and the proposed development reducing privacy afforded within the local nature reserve would be assessed at the reserved matters stage. The potential impact of the development upon access to Saltwells Inn during its construction is not technically a planning issue.

CONCLUSION

101. The NPPF advises Local Planning Authorities that there is a presumption in favour of economic development, which includes housing growth and maintains that planning policies should avoid the long term protection of sites allocated for employment purpose that are no longer suitable. The site has been identified as a potential housing site in the SHLAA and forms part of the 5 year housing land supply as part of Policy HOU1 of the BCCS. Sufficient evidence has been submitted to demonstrate the loss of the site for employment use and thereby ensuring compliance with Policy DEL2 of the BCCS.

102. The accompanying Transport Assessment and highway drawings have satisfactorily demonstrated that an appropriate access could be achieved to the proposed development in conjunction with highway improvements to Saltwells Road and the detailed design of the public highway forming part of the development.
103. The proposed development would not raise concerns with respect to flood risk given that the adjoining Blackbrook is set significantly lower than the application site. Conditions can be attached to ensure the incorporation of sustainable drainage techniques within the detailed scheme to prevent an increase in surface water runoff.
104. An outline remediation strategy has been submitted as part of the planning application. Conditions would ensure that ground conditions and potential contamination are dealt with appropriately.
105. The applicant has agreed to provide electric vehicle charging points per dwelling. This would provide mitigation against an increase in vehicle trips as a result of the proposed development that would have an adverse impact upon air quality.
106. The redevelopment of the site for housing would not raise concerns with respect to potential noise complaints from adjoining industrial units since the site does not neighbour any other employment uses. A condition can be attached to ensure that prospective occupiers of the residential units are protected from noise associated with Saltwells Road.
107. On balance, subject to the implementation of the form of development as set out in the Development Principles v3 plan and the implementation of on-site nature conservation mitigation, compensation and enhancement secured by condition and a planning obligation to secure off site footpath improvements, the proposed development would not raise any significant nature conservation concerns to warrant the refusal of planning permission.

RECOMMENDATION

108. It is recommended that the application be APPROVED subject to:

- a) The applicant entering into a Section 106 Agreement for a contribution towards footpath improvements within Saltwells Local Nature Reserve totalling £2,365.72 and 10% affordable housing to be provided on site and a management and monitoring charge of £250.
- b) The completion of the Agreement within three months of the date of this approval and, in the event of this not happening, the application being refused if appropriate.
- c) The following conditions, with delegated powers to the Director of the Urban Environment to make amendments to these as necessary

Reason for approval

The NPPF advises Local Planning Authorities that there is a presumption in favour of economic development, which includes housing growth and maintains that planning policies should avoid the long term protection of sites allocated for employment purpose that are no longer suitable. The site has been identified as a potential housing site in the SHLAA and forms part of the 5 year housing land supply as part of Policy HOU1 of the BCCS. Sufficient evidence has been submitted to demonstrate the loss of the site for employment use thereby ensuring compliance with Policy DEL2 of the BCCS.

The accompanying Transport Assessment and highway drawings have satisfactorily demonstrated that an appropriate access could be achieved to the proposed development in conjunction with highway improvements to Saltwells Road and the detailed design of the public highway forming part of the development.

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The redevelopment of the site for housing would not raise concerns with respect to potential noise complaints from adjoining industrial units since the site does not neighbour any other employment uses. A condition can be attached to ensure that prospective occupiers of the residential units are protected from noise associated with Saltwells Road.

On balance, subject to the implementation of the form of development as set out in the Development Principles v3 plan and the implementation of on-site nature conservation mitigation, compensation and enhancement secured by condition and a planning obligation to secure off site footpath improvements, the proposed development would not raise any significant nature conservation concerns to warrant the refusal of planning permission.

The decision to grant planning permission has been taken with regard to the policies and proposals in the adopted Dudley UDP (2005) and to all other relevant material considerations.

The above is intended as a summary of the reasons for the grant of planning permission. For further detail on the decision please see the application report.

APPROVAL STATEMENT INFORMATIVE

In dealing with this application the local planning authority have worked with the applicant in a positive and proactive manner, seeking solutions to problems arising in relation to dealing with the application, by seeking to help the applicant resolve technical detail issues

where required and maintaining the delivery of sustainable development. The development would improve the economic, social and environmental concerns of the area and thereby being in accordance with paragraphs 186 and 187 of the National Planning Policy Framework.

NATURE CONSERVATION INFORMATIVES

Working Protocols

Detailed working protocols, based on good practice such the Pollution Prevention Guidelines PPG1 (general) by the Environment Agency, should be prepared and adhered to during all works. These should ensure no negative impacts could occur, such as contamination, light pollution or disturbance affects the adjacent wildlife site and/or protected species.

Protected species found on site

If protected species are found during any stage of the development all works must stop immediately and Natural England, the project's ecologist and the Council's Nature Conservation Officer must be contacted immediately. Works should not re-commence until relevant licences have been obtained and written permission is granted by Natural England and the Council.

Careful site clearance

The demolition of the buildings and the clearance of trees and other vegetation should avoid the bird nesting season (February – August inclusive). Similarly trees, trees and other features where bats or birds could be present (see the ecological reports for details) should be removed carefully by hand. If bats or nesting birds are found or suspected all works must stop immediately and Natural England, the project's ecologist and the Council's Nature Conservation Officer must be contacted at once. Works should not re-commence until relevant licences have been obtained and written permission is granted by Natural England and the Council. All works must be carried out in accordance to any licences obtained.

Protection of badgers

Any trenches, including foundations, should be covered with boards and ramps placed in them overnight to limit their hazard to badgers. Similarly loose mounds of soil should be fenced to exclude badgers.

Conditions and/or reasons:

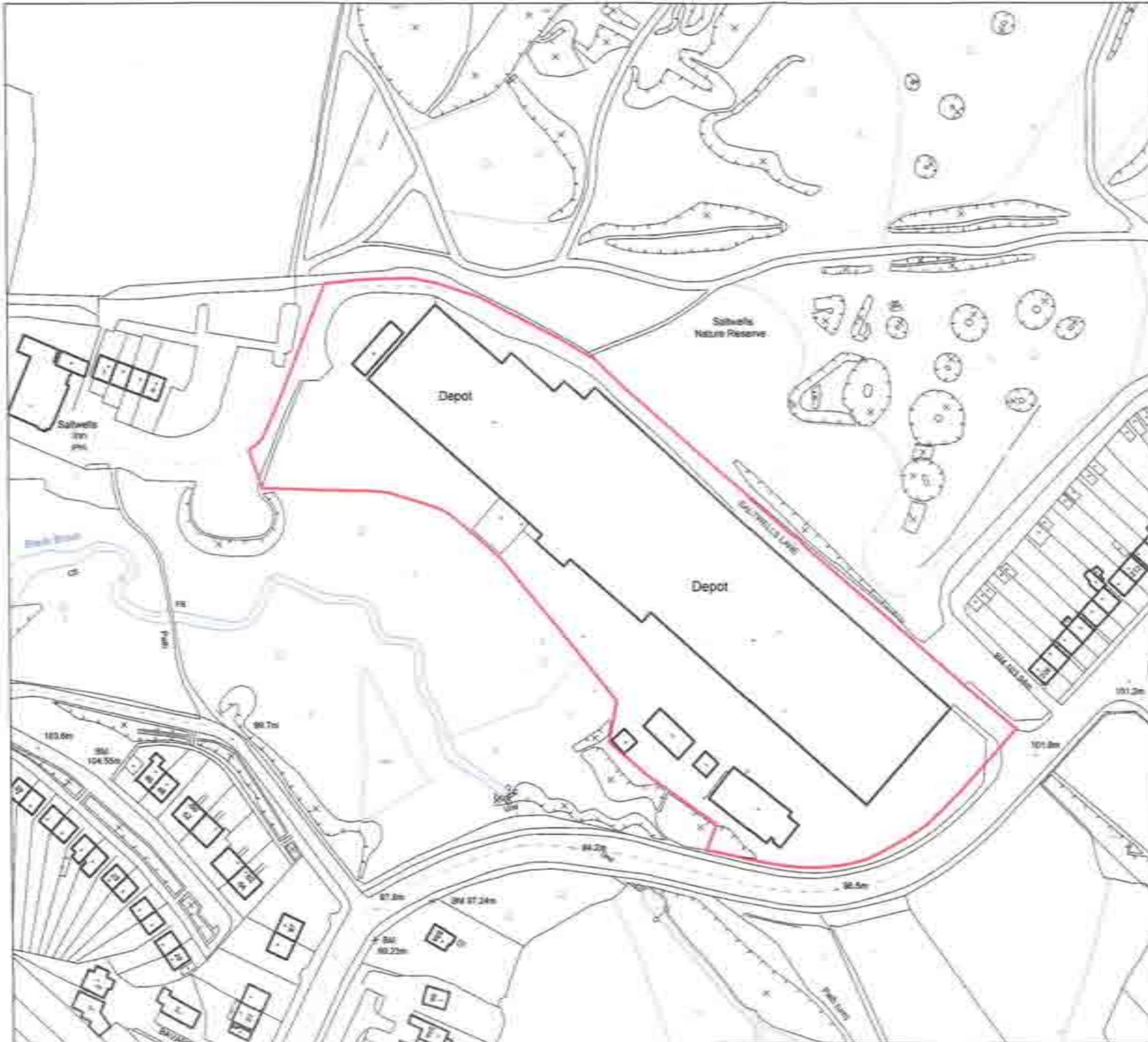
1. Application for approval of the reserved matters shall be made to the Local Planning Authority before the expiration of three years from the date of this permission. The development hereby permitted shall be begun before the expiration of two years from the date of approval of the last of the reserved matters to be approved.
2. Approval of the details of appearance, layout, scale and landscaping of the site (hereinafter called 'the reserved matters') shall be obtained from the local planning authority before any development is begun.
3. No development shall commence until details of nature conservation mitigation, compensation and enhancement works have been submitted to and approved in writing by the Local Planning Authority. The nature conservation enhancement works shall thereafter be provided in accordance with the approved details prior to first occupation of the development and be maintained for the life of the development.
4. No development shall commence until details of works of public art have been submitted to and approved in writing by the Local Planning Authority. The works of public art shall thereafter be provided in accordance with the approved details prior to first occupation of the development and be maintained for the life of the development.
5. No development shall commence until an Economic and Community Development Statement has been submitted to and approved in writing by the Local Planning Authority. The Statement shall address as a minimum, measures to increase the number of jobs open to local people available on the site and the development of initiatives that support activities to upskill local unemployed people of working age so as to support them into sustained employment as outlined in the Council's Planning Obligations Supplementary Planning Document. The development shall be implemented in accordance with the approved Statement and retained in accordance with the Statement for the lifetime of the development.
6. No development shall commence until details for the provision of external electric charging points have been submitted to and approved in writing by the Local Planning Authority. The Electric Charging point(s) shall thereafter be provided in accordance with the approved details prior to first occupation of the development and be maintained for the life of the development.

7. Development shall not begin until a scheme for protecting residents in the proposed dwellings from noise from road traffic on Saltwells Road has been submitted to and approved in writing by the Local Planning Authority. All works which form part of the approved scheme shall be completed before occupation of the permitted dwellings, unless otherwise agreed in writing by the Local Planning Authority. The protection measures in the agreed scheme shall be maintained throughout the life of the development.
8. No development shall begin until an assessment of the risks posed by any contamination has been submitted to and approved by the Local Planning Authority. Such an assessment shall be carried out in accordance with authoritative UK guidance.
9. Where the approved risk assessment (required by CL01a) identifies contamination posing unacceptable risks, no development shall begin until a detailed scheme to protect the development from the effects of such contamination has been submitted to and approved by the local planning authority.
10. Unless otherwise agreed in writing with the LPA, the approved scheme (required by CL01b) shall be implemented and a verification report submitted to and approved by the LPA, before the development (or relevant phase of the development) is first occupied/brought into use.
11. No development shall begin until an assessment of the risks posed by any ground gases or vapours has been submitted to and approved by the Local Planning Authority. Such an assessment shall be carried out in accordance with authoritative UK guidance.
12. Where the approved risk assessment (required by CL02a) identifies ground gases or vapours posing unacceptable risks, no development shall begin until a detailed scheme to protect the development from the effects of such contamination has been submitted to and approved by the local planning authority.
13. Unless otherwise agreed in writing with the LPA, the approved scheme (required by CL02b) shall be implemented and a verification report submitted to and approved by the LPA, before the development (or relevant phase of the development) is first occupied/brought into use.
14. The dwellings shall not be occupied until the highway improvements shown on Drawing No. 8021/108 Rev A prepared by Baynham Meikle Partnership have been implemented in accordance with the these details and retained for the lifetime of the development.
15. The development hereby permitted shall be carried out in accordance with the following approved plans: Development Principles v3 prepared by Capita Symond, the development principles set out within the submitted Design and Access Statement and the Site Access Proposals Drawing No. 8021/108 Rev A prepared by Baynham Meikle Partnership.
16. Before development begins details shall be submitted to and approved in writing by the Local Planning Authority of a surface water drainage scheme for the site, based on sustainable drainage principles. The approved scheme shall be implemented in accordance with the approved details and retained for the lifetime of the development.

17. Prior to the commencement of development, details of the works for the disposal of foul and surface water drainage shall be submitted to and approved in writing by the Local Planning Authority. All works shall be completed in accordance with the approved details prior to the occupation of the dwellings hereby permitted.
18. Prior to the commencement of development, details of the existing and proposed levels of the site (including finished floor levels), which should be related to those of adjoining land and highways shall be submitted to and approved in writing by the local planning authority. The development shall proceed in accordance with the approved levels.
19. Prior to the commencement of development, details of the types, colours and textures of the materials to be used in the hard surfacing of the development hereby approved shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in complete accordance with the approved details and retained for the lifetime of the development unless otherwise agreed in writing with the local planning authority.
20. Prior to the commencement of development, details of the types, colours and textures of the materials to be used on the dwellings hereby permitted shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in complete accordance with the approved details.
21. Prior to the commencement of development, details of the materials, including colours, of any retaining walls to be built within the proposed development shall be submitted to and approved in writing by the Local Planning Authority. The development shall proceed in accordance with the approved details prior to occupation and the walls shall be retained and maintained as approved for the lifetime of the development.
22. Prior to the commencement of development, details of the [boundary treatments /walls/fences] to be installed on the whole site shall be submitted to and approved in writing by the Local Planning Authority. These details shall include location of boundary treatment. Elevation details shall also be supplied, or planting species/distances, as appropriate. The development shall proceed in accordance with the approved details, which shall be installed on site prior to occupation and thereafter maintained for the lifetime of the development unless otherwise agreed in writing by the Local Planning Authority.
23. Bat surveys to the standard of either the Nature Conservation SPD or Bat Conservation Trust's Bat Surveys: Good Practice Guidelines (2012) must be submitted along with a plan of any mitigation required for agreement at Reserved Matters stage, or prior to demolition if this is in advance of any subsequent planning applications. The surveys must include the whole of the site (including appropriate areas adjacent to the site) and be carried out by an experienced and qualified bat worker and integrated into a site mitigation plan. All works must be carried out in accordance to the approved plan and retained for the lifetime of the development.
24. No works must commence, or continue, if the most recent protected species survey and assessment is over 12 months old. These surveys and assessments must be of, or above, the standard detailed within the Nature Conservation SPD. They must include the whole of the site (including appropriate areas adjacent to the site) and be carried out by an experienced and qualified ecological consultant and integrated into a site mitigation plan. All of these must be submitted to and approved in writing by the Council before any works commence (or continue). All works must be carried out in accordance to the approved plan.

25. Before development begins, details shall be submitted to and approved in writing by the Local Planning Authority of the coal mining conditions present on site and remedial measures required to address any mine entries and/or areas of shallow coal mine workings. The scheme shall be implemented in accordance with the approved remediation measures before commencement of the erection of the dwellings. The agreed remedial measures shall be retained for the lifetime of the development.
26. Prior to the commencement of development a plan detailing outside lighting will be submitted and approved in writing by the LPA. All works must be carried out in accordance to the approved plan and conform to these requirements for the life of the development. All outside lighting should conform to the Bat Conservation Trust and Institute for Lighting Engineers' guidance 'Bats and lighting in the UK'. It should be close to the ground and directed downwards and away from the surrounding wildlife habitat.
27. At least 10% of the energy supply of the development shall be secured from decentralised and renewable or low-carbon energy sources. Details and a timetable of how this is to be achieved, including details of physical works on site, shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the store. The approved details shall be implemented in accordance with the approved timetable and retained as operational thereafter, unless otherwise agreed in writing by the Local Planning Authority.

Key



SCALE 1:1,250



Aube Properties Ltd
Land off Saltwells Road, Dudley
Planning Application
CSI/488801 Site Boundary
October 2010

NOTES

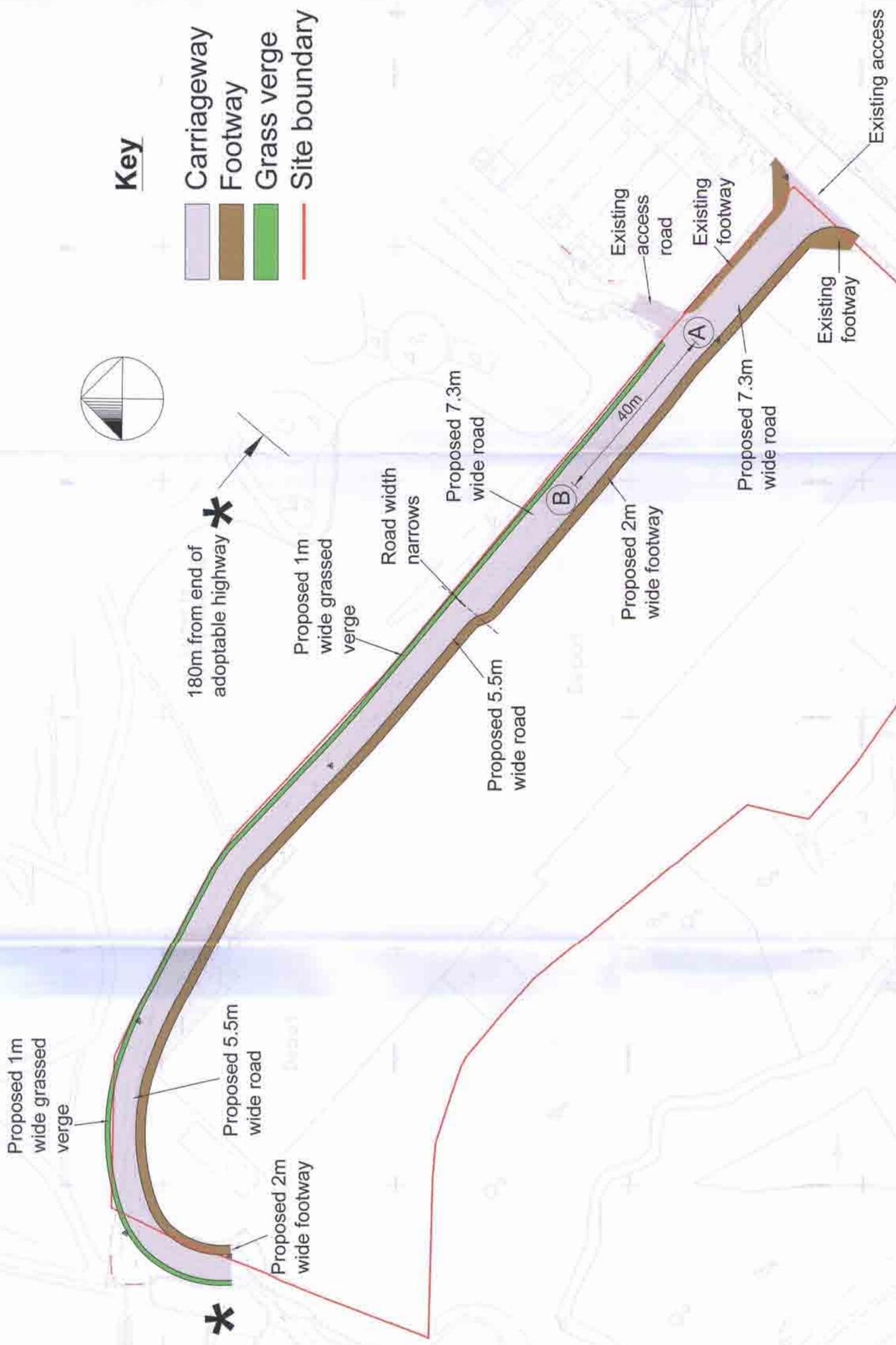
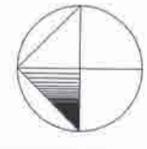
Key (Traffic Calming)

- A - Traffic calming required:
Option 1, speed tables at existing junction
Option 2, speed cushions (preferred to
emergency services)
- B - Junction spacing 40m. If first junction into
site is linked to emergency access route
upto Saltwells Inn the 7.3m width could
finish at this junction

21 OCT 2011

Key

-  Carriageway
-  Footway
-  Grass verge
-  Site boundary



PRELIMINARY FOR DISCUSSION

Rev	Date	Description	By	Checked By
A	04/03/10	Road alignment amended	GE	NSB

Project	SALTWELLS LANE, DUDELEY
Dwg Number	8021/109
Rev	A

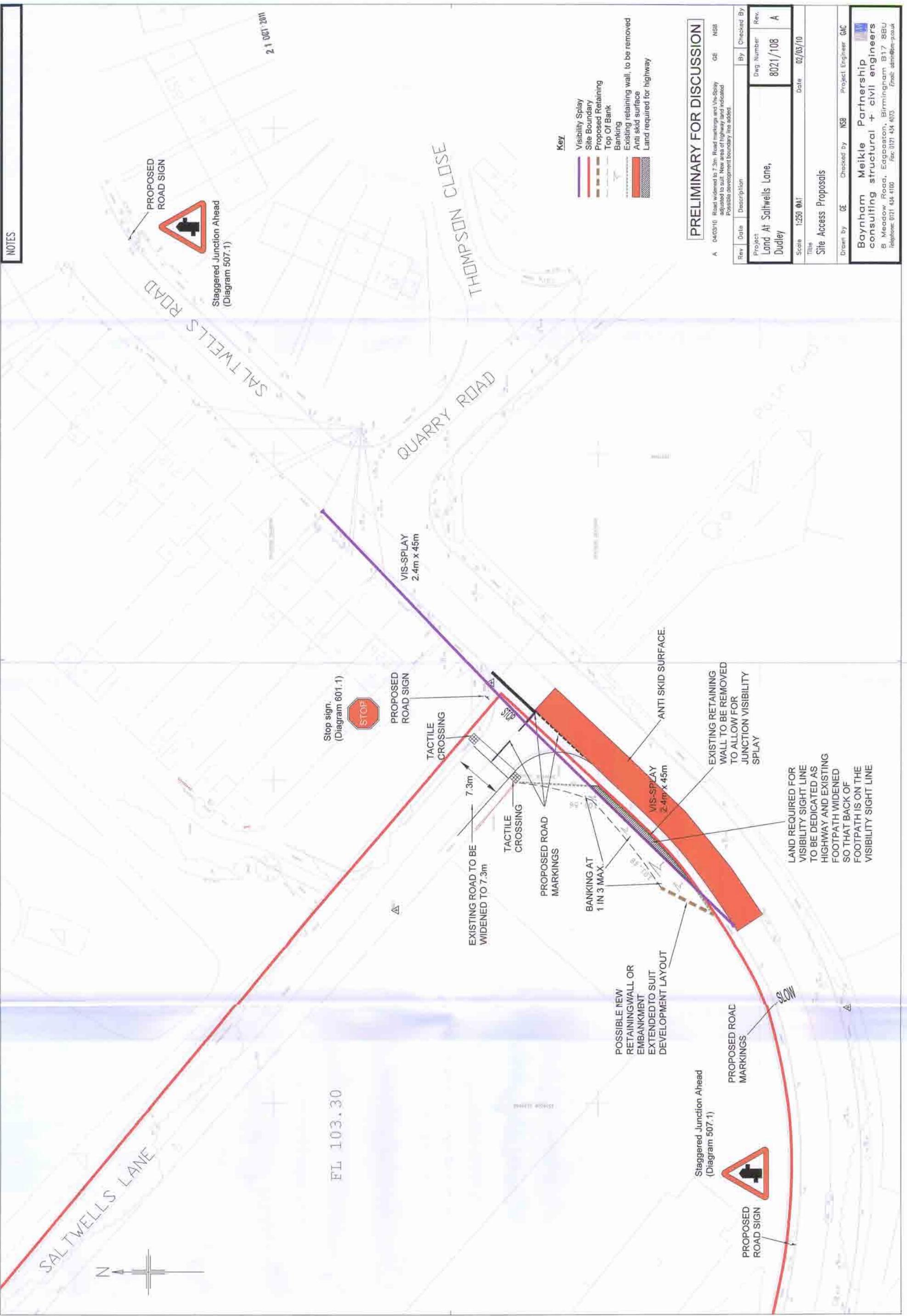
Scale	1/500 @ A1
Title	Indicative Road Alignment
Date	02/03/09

Drawn by	GE	Checked by	NSB	Project Engineer	GAC
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Baynham Meikle Partnership
consulting structural + civil engineers
8 Meadow Road, Edgbaston, Birmingham B17 8BU
Telephone: 0121 434 4100 Fax: 0121 434 4073 Email: admin@bm-p.co.uk

NOTES

21 OCT 2011



Key

- Visibility Splay
- Site Boundary
- Proposed Retaining
- Top Of Bank
- Banking
- Existing retaining wall, to be removed
- Anti skid surface
- Land required for highway

PRELIMINARY FOR DISCUSSION

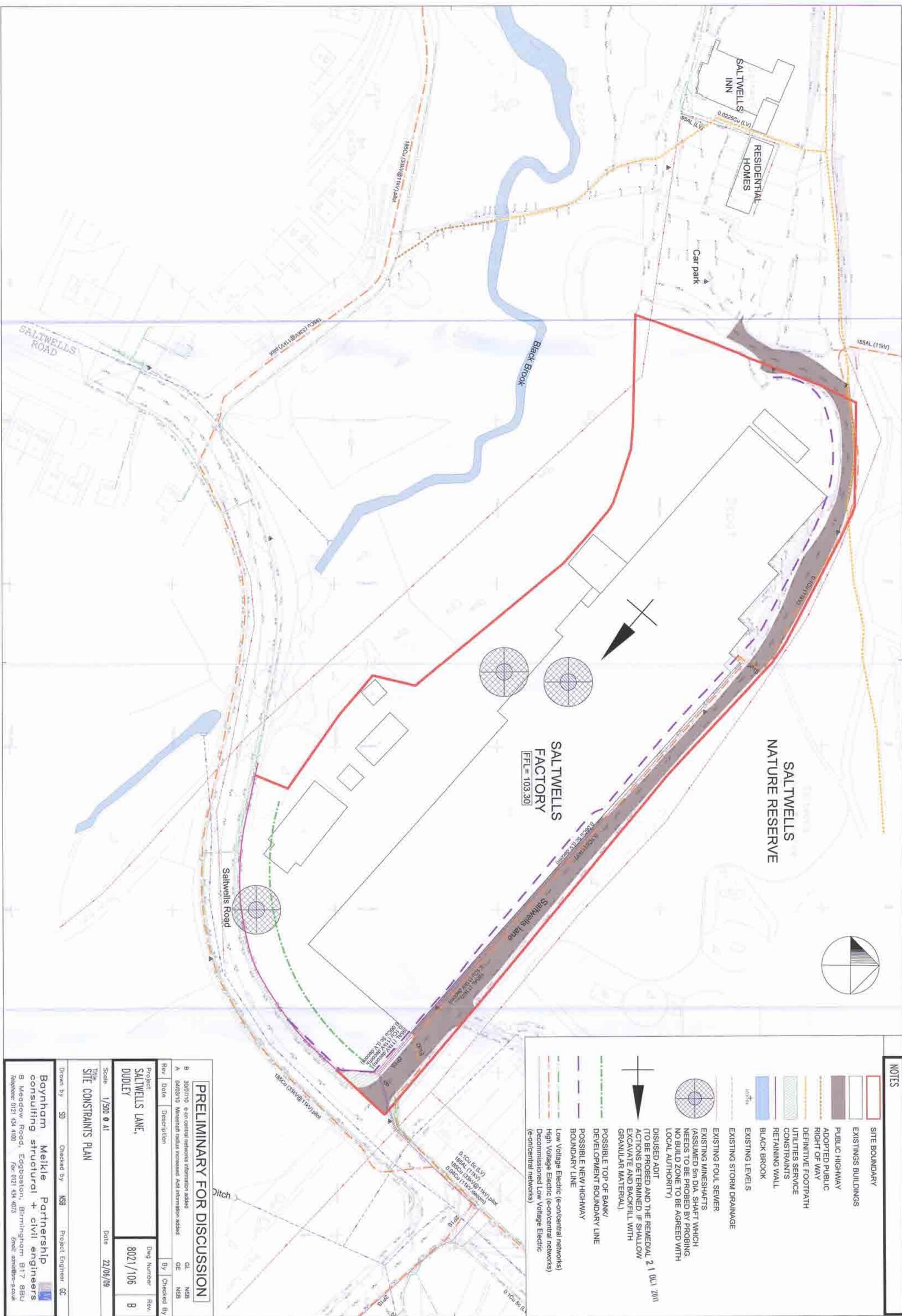
A 04/03/10 Road widened to 7.3m. Road markings and Vis-Splay adjusted to suit. New area of highway land indicated. Possible development boundary line added.

Rev	Date	Description	By	Checked By
		Project: Land At Saltwells Lane, Dudley		
		Dwg Number: 8021/108		
		Rev: A		
		Scale: 1:250 @A1		
		Title: Site Access Proposals		
		Date: 02/05/10		

Drawn by: GE
Checked by: NSB
Project Engineer: GAC

Baynham Meikle Partnership
consulting structural + civil engineers
8 Meadow Road, Edgbaston, Birmingham B17 8SU
Telephone: 0121 434 4100 Fax: 0121 434 4070 Email: admin@bm-part.co.uk

LAND REQUIRED FOR VISIBILITY SIGHT LINE TO BE DEDICATED AS HIGHWAY AND EXISTING FOOTPATH WIDENED SO THAT BACK OF FOOTPATH IS ON THE VISIBILITY SIGHT LINE.



NOTES

- SITE BOUNDARY
- EXISTING BUILDINGS
- PUBLIC HIGHWAY
- ADOPTED PUBLIC RIGHT OF WAY
- DEFINITIVE FOOTPATH
- UTILITIES SERVICE CONSTRAINTS
- RETAINING WALL
- BLACK BROOK
- EXISTING LEVELS
- EXISTING STORM DRAINAGE
- EXISTING FOUL SEWER
- EXISTING MINESHAFTS (ASSUMED 5m DIA. SHAFT WHICH NEEDS TO BE PROBED BY PROBING. NO BUILD ZONE TO BE AGREED WITH LOCAL AUTHORITY)
- DISUSED ADIT (TO BE PROBED AND THE REMEDIAL 21 Oct 2011 ACTIONS DETERMINED. IF SHALLOW EXCAVATE AND BACKFILL WITH GRANULAR MATERIAL)
- POSSIBLE TOP OF BANK/ DEVELOPMENT BOUNDARY LINE
- POSSIBLE NEW HIGHWAY BOUNDARY LINE
- Low Voltage Electric (e-on/central networks)
- High Voltage Electric (e-on/central networks)
- Decommissioned Low Voltage Electric (e-on/central networks)

PRELIMINARY FOR DISCUSSION

Rev	Date	Description	By	Checked By
B	30/07/10	e-on central networks information added	GL	NSB
A	04/03/10	Mineshaft profiles increased. Adit information added	GE	NSB

Project:	SALTWELLS LANE, DUDLEY	Dwg Number:	8021/106	Rev:	B
Scale:	1/500 @ A1	Date:	22/06/09		

THE SITE CONSTRAINTS PLAN

Drawn by: SD Checked by: NSB Project Engineer: GC
 Baynham Melkie Partnership
 consulting structural + civil engineers
 8 Meadow Road, Edgbaston, Birmingham B17 8BU
 Telephone: 0121 434 4100 Fax: 0121 434 4073 Email: admin@b-m.co.uk