

SOUTH STAFFORDSHIRE LOCAL PLAN 2018-2038

PREFERRED OPTIONS

LAND EAST OF SCHOOL LANE, COVEN

ON BEHALF OF CAMERON HOMES

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**



Pegasus Group

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APPENDIX 1: INDICATIVE MASTERPLAN

1.0 INTRODUCTION

1.1 These representations are made by Pegasus Group on behalf of Cameron Homes to the South Staffordshire Council Local Plan Preferred Options. This representation relates to Land East of School Lane, Coven (**Appendix 1**).

1.2 This representation responds to the emerging policies and allocation having regard to the national and local planning policy context. The tests of soundness are set out in the National Planning Policy Framework (NPPF) paragraph 35. For a Plan to be sound it must be:

- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2.0 PLANNING POLICY CONTEXT

2.1 This Chapter recognises the need for the Local Plan to set a vision and address strategic priorities for the area across the Plan period. The strategic policies for an area should include policies and site allocations to address key issues. This Chapter also recognises the duty to co-operate and the need to work with neighbouring authorities to meet unmet housing need arising from the Greater Birmingham Housing Market Area (GBHMA).

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No.

2.2 Generally, the documents listed in Appendix A are considered to represent comprehensive evidence base necessary to support a local plan. It is also noted that a number of the documents have been updated in 2021, which is also supported.

2.3 However, concern is raised that the *Greater Birmingham HMA Strategic Growth Study*, *SSDC's Self Build & Custom Build Register* and the *Strategic Housing & Employment Land Availability Assessment ('SHELAA')* are not included, although it is noted that an updated SHELAA (2021) is available on SSDC's website. It is therefore assumed that its omission from Appendix A is a typographical error.

2.4 The GBHMA Strategic Growth Study remains the latest comprehensive consideration of housing needs across the Greater Birmingham and Black Country HMA and provides a range of recommended options for meeting these needs, to be tested through individual LPA Local Plan reviews. This evidence has been subject to scrutiny as supporting evidence at the North Warwickshire Local Plan examination and provides justification for SSDC's intended contribution of 4,000 homes to assist in meeting the identified housing shortfall.

2.5 Similarly, it is considered the Self Build & Custom Build Register should be

identified as part of the evidence base to inform emerging policies in respect of housing needs and mix, including the level of self-build and custom-build housing that is expected to be provided on applications for residential development.

Question 2: (a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP? Yes/No

(b) Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver? Yes/No

2.6 It is considered that the correct infrastructure to be delivered alongside proposed site allocations has generally been identified in the IDP. The Council should continue to engage with developers and other relevant stakeholders to confirm infrastructure requirements, including for health and education.

Question 3: (a) Have the correct vision and strategic objectives been identified? Yes/No

(b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No

2.7 Cameron Homes generally support the Vision however as currently drafted it is not spatially specific and would benefit from additional proactive wording to support the development proposals identified in the Plan.

2.8 Cameron Homes are generally supportive of the strategic objectives identified which are spatially specific and seek to address areas of change or protection within the District. It is suggested that the Vision should clearly reflect this approach.

2.9 Cameron Homes considers that the draft policies and policy directions will

contribute towards delivering these objectives.

3.0 DEVELOPMENT STRATEGY

Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside?

- 3.1 The Local Plan recognises there is a need to amend Green Belt boundaries to accommodate growth requirements in this Plan period. The currently adopted Site Allocations Document identified a number of safeguarded sites to meet longer term growth requirements which were removed from the Green Belt at this time, including land west of School Lane, Coven. This site, along with other safeguarded sites, is now proposed to be a full allocation. This approach is supported and reflects the requirements of the National Planning Policy Framework (NPPF) that the planning system should be genuinely plan-led (paragraph 15). The currently adopted Plan identifies safeguarded land for future development and this Plan continues the approach and, having established the extent of the need for additional housing, allocates these safeguarded sites.
- 3.2 Green Belt policy should reflect national policy, as set out in Chapter 13 of the NPPF. The draft policy sets out that the construction of new buildings within the Green Belt should be regarded as inappropriate, unless it is for one of the exceptions listed within the NPPF. As well as new buildings, the NPPF also sets out that other forms of development are also not inappropriate in the Green Belt at paragraph 150. The policy should make clear that these forms of development are also an exception which can be permitted without the need for very special circumstances.
- 3.3 The draft policy sets out that a separate Green Belt Supplementary Planning Document (SPD) will be prepared for further guidance. This should align with national and local policy, particularly as SPDs are not subject to public examination.

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy 2038?

- 3.4 Cameron Homes generally support the policy approach in Policy DS3. The comments below address the relevant elements of the spatial strategy for housing.
- 3.5 The Local Plan Review uses the Government’s standard method for calculating housing need which produces a minimum average annual figure of 243 dwellings per annum (2021-2038) for the District. This is generally supported, in particular the acknowledgement that the standard method represents a minimum figure. The Review does not yet identify a housing trajectory however, in order to maintain supply in the early years of the Plan period, smaller and medium sized sites, in particular the former safeguarded sites, will need to come forward early in the Local Plan period as the larger, strategic sites will take longer to deliver and are likely to come towards the end of the Plan period.
- 3.6 The Plan Review also acknowledges the housing shortfall arising from the Greater Birmingham Housing Market Area (GBHMA), in particular from Birmingham and the Black Country Authorities. South Staffordshire Council suggest making a contribution of 4,000 dwellings towards this shortfall. This approach is generally supported.
- 3.7 The Spatial Strategy is generally supported. The Strategy allocates the majority of housing growth to Tier 1 and Tier 2 settlements, followed by areas adjacent to neighbouring towns and cities, and then Tier 3 settlements. This strategy is supported as it allocates growth in line with access to local services and facilities whilst ensuring that smaller settlements with facilities (those in Tier 3) receive appropriate growth to maintain and enhance the vitality of local communities (NPPF, paragraph 79).
- 3.8 Coven is located in Locality 2 and is identified as a Tier 3 settlement. The Rural Services and Facilities Audit (2021) identifies Coven has a first school, eight other community services (shops, café, post office and village hall) and a food

convenience store. The Audit identifies that Coven benefits from a village centre and good bus links to services and facilities located in the wider local area. The Evidence Base clearly supports the inclusion of Coven as a Tier 3 settlement.

- 3.9 Housing growth will be delivered through existing planning permissions, allocations and delivery of previously safeguarded land. This reflects the planned nature of the planning system and seeks to deliver a safeguarded site already found 'sound' through the previous plan examination. The delivery of planning growth will support the local services and facilities in Coven and is supported.

Question 8: Do you support the proposed housing allocations in Policy SA5?

- 3.10 Cameron Homes are supportive of the proposed housing allocations in Policy SA5. Site 082 Land East of School Lane was previously a safeguarded site and is now proposed as a full allocation. This is supported and continues the planned approach to housing delivery in the District. Site 082 is proposed to be allocated for a minimum of 48 dwellings which is supported, as is the approach of identifying capacity figures as a minimum.

4.0 DEVELOPMENT MANAGEMENT POLICIES

4.1 It is noted that the Preferred Options document sets out a proposed policy approach rather than full draft policy wording. Cameron Homes reserves the right to comment further when draft policy wording is available. At this point, the below comments are intended to assist with the drafting of development management policies.

Question 11: Do you agree with the proposed policy approaches set out in Chapter 6?

Policy HC1 – Housing Mix

4.2 This wording is not sufficiently clear or flexible. It is not clear whether applications will be expected to strictly accord with the evidence presented in the SHMA, or simply have 'reference' to that evidence. It is most appropriate for housing mix to be guided by market signals as reflected in the most up-to-date assessment of needs. Such assessments will need to be updated over the course of the Plan period. The requirement that 75% of properties comprise of three-bedrooms or less is restrictive and does not afford the flexibility required for the reasons set out above.

4.3 The policy should also include those exceptions may be made in certain circumstances, such as when evidence is presented to justify a different mix or if viability considerations indicate a policy-compliant mix would not be viable.

Policy HC2 – Housing Density

4.4 The objective of achieving an efficient use of land on development sites is supported however the policy should be drafted to recognise that a blanket approach to density is unlikely to be effective as this will vary between individual sites depending on specific site constraints and opportunities.

Policy HC3 – Affordable Housing

- 4.5 The meaning of the phrase 'major residential development' in this particular policy context should be clarified. Policy HC1 includes a footnote to define the threshold for major residential development and the same approach should be carried through.
- 4.6 The requirement to 'pepperpot' affordable housing in clusters across the development is generally supported however the policy should recognise that for management purposes, Registered Providers do require a degree of clustering of affordable housing within a development and this will inform site layouts. The policy should be adjusted to reflect this and allow for clusters of 6-8 dwellings on medium-sized developments.
- 4.7 Policy HC3 also suggests it would not support grant funding for homes to be provided under the requirements of the Policy. It is submitted that the funding mechanisms for the delivery of affordable housing is not a planning matter and is therefore beyond the remits of a Policy to control. This text should accordingly be removed.

Policy HC4 – Homes for Older People

- 4.8 It is not clear if this policy intends to continue to Council's current approach of requiring 10% of all homes to be delivered as bungalows or other ground floor accommodation.
- 4.9 The policy sets out that 30% of all market and affordable homes should meet Building Regulations Standard Part M4(2) Accessible and adaptable dwellings. These requirements are optional and are described as making "reasonable provision for most people to access the dwelling and incorporate features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users."
- 4.10 The SHMA identifies a need for 1,783 accessible and adaptable general homes

for those over 65 years and 1,235 for those under 65 years, across the Plan Period. This equates to less than 30% of the overall housing requirement to be delivered by this Plan. It is therefore not clear how the 30% requirement has been arrived at or how this is justified. The requirement to provide a proportion of dwellings to meet Part M4(2) may be justified but it would not be appropriate to include both this requirement and a requirement to provide bungalows or other ground floor accommodation.

Policy HC7 – Self & Custom Build Housing

4.11 This policy should clarify how 'major residential development' is defined. It is likely that only larger, strategic sites will set aside plots for self & custom housing. The approach of agreeing provision on a site-by-site basis, having regard to the latest evidence from the register, is generally supported. This document should form part of the Local Plan evidence base.

4.12 It is nevertheless submitted that the above Policy should include a mechanism to allow for such plots to come forward for market housing if demand is subsequently found to be absent. For example, if serviced plots for self-build and custom housebuilding have been made available and marketed for 12 months and have not sold, plots can be used for delivery of general market housing.

Policy HC9 – Design Requirements

4.13 The policy aspiration to deliver high quality design is generally supported. The policy requirement for tree-lined streets should be discussed with the highway authority to seek their agreement, in particular to adoption of trees in highway verges and ongoing maintenance and management arrangements.

Policy HC11 – Space About Dwellings and Internal Space Standards

4.14 The continuity of existing external space and dwellings standards is generally supported although there should be a recognition that certain housetypes, for

example Part M4(2) dwellings, should have smaller, more manageable gardens.

4.15 The requirement that all dwellings should meet Nationally Described Space Standards is not supported. National Planning Guidance Housing: optional technical standards (paragraph 020) clearly states that "Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- *Need – evidence should be provided in the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes*
- *Viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted*
- *Timing – there may need to be a reasonable transition period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions."*

4.16 It is clear that the introduction of the NDSS requires a Local Plan policy which has been fully evidenced, justified and viability tested. The Strategic Housing Market Assessment (SHMA) makes reference to the NDSS (paragraph 7.35) only in the context of assessing the need for accessible and adaptable homes. the SHMA does not provide any justification or evidence for requiring NDSS in the District.

4.17 If NDSS is subsequently justified and pursued, the policy should be sufficiently flexible to recognise that well-designed housetypes which fall slightly below will

be acceptable, particularly on sites where the majority of the dwellings comply. The policy should also make provision for additional flexibility in relation to affordable housing as many registered providers have their own requirements.

Policy HC12 – Parking Standards

- 4.18 The continuity of existing parking standards is supported. The inclusion of EV charging standards is also supported and provides helpful clarity.

Policy HC14 – Health Infrastructure

- 4.19 The policy objective of ensuring development does not result in an unacceptable impact on health infrastructure is supported. It is suggested that the Council should engage with the CCG now regarding proposed allocations to refine the approach to infrastructure contributions and include this as part of the IDP. Any infrastructure contributions will be required to meet the CIL tests. This approach ensures that all likely costs associated with the proposed allocations are known, thus allowing for an informed view as to their viability.

Policy HC15 – Education

- 4.20 The policy approach is generally supported although it is suggested that the Council should engage with SCC Education and include relevant infrastructure requirements as part of the IDP.

Policy HC17 – Open Space

- 4.21 The policy requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site, for example where there is already high-quality equipped play provision in the locality it would not make sense to duplicate this provision. In addition, it is not appropriate to require open space to be centrally located on all sites. The policy should take a more flexible approach to achieve the right design solution for each site. For example, Land East of School Lane is adjacent to existing play facilities which

will be relocated nearby as part of the development proposals. It therefore does not make sense to duplicate play provision on-site, immediately adjacent to new play equipment. The Indicative Masterplan also demonstrates open space does not have to be centrally located to be well-designed and accessible.

- 4.22 The exclusion of small incidental green infrastructure (GI) without a clear recreational purpose from on-site open space provision is not supported. The policy text cites landscape buffers as an example of incidental GI which may be excluded. This is not appropriate as landscape buffers clearly make a contribution towards open space provision on a site and should be included in these calculations. Clarification should also be provided as to whether features such as attenuation basins are considered to be 'incidental'.

Policy HC18 – Sports Facilities and Playing Pitches

- 4.23 This policy is noted, although it is suggested that it would be more appropriate for SSDC to define standards expected from development as part of policy (as per the open space standard defined by Policy HC17, for example). This approach provides greater certainty in respect of the infrastructure delivery requirements expected from sites, which ultimately impacts upon their viability. The level of provision expected, and the associated viability implications should be considered within both the IDP and viability assessment.

Policy EC9 – Infrastructure

- 4.24 This policy is noted and commits the Council to work with and support infrastructure providers and also offer policy support for the delivery of infrastructure identified through the IDP. This is broadly supported, although this engagement with relevant providers should also be taking place as part of the Plan process.

Policy EC10 – Developer Contributions

- 4.25 Policy EC10 confirms that specific infrastructure requirements will be identified

in relevant policy areas and site proformas. Whilst this approach is supported, it is important that a detailed list of infrastructure requirements is included within the Publication (Regulation 19) version of the Plan, to allow for sufficient scrutiny and comment by the public and interested parties.

Policy NB3 – Cannock Chase SAC

- 4.26 The Local Plan Review notes that a separate suite of joint studies are being updated with adjoining authorities in relation to Cannock Chase SAC. The findings of these studies should influence the policy approach to Cannock Chase SAC and determine appropriate mitigation measures.

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

- 4.27 The aspirations of this policy to reduce carbon emissions is generally supported. The policy should set out the threshold at which developments are required to submit an energy statement.

5.0 LAND EAST OF SCHOOL LANE, COVEN

5.1 This Chapter sets out a brief description of Land East of School Lane, Coven. This is followed by an assessment of the site against each of the site selection criteria, as set out in the Housing Site Selection Topic Paper.

Site Description

5.2 Cameron Homes has current land interests at School Lane (see **Appendix 1**). The site comprises approximately 3ha and is currently comprised of undeveloped land. It is bounded by existing residential development to the south and west, the A449 road to the east and playing fields to the north.

5.3 There are existing hedgerows and trees along the eastern, southern and western site boundaries but the site itself is a continuous field and is not divided by hedgerows.

Sustainability Appraisal

5.4 Land East of School Lane is assessed within the SA as 'Land between A449 Stafford Rd & School Lane' under site reference: 082. This includes an assessment of the nature and magnitude of the impact of the development, both pre- and post-mitigation. These assessments are reproduced in Figures 6.1 and 6.2 below.

| Site Reference | 1 Climate Change Mitigation | 2 Climate Change Adaptation | 3 Biodiversity & Geodiversity | 4 Landscape & Townscape | 5 Pollution & Waste | 6 Natural Resources | 7 Housing | 8 Health & Wellbeing | 9 Cultural Heritage | 10 Transport & Accessibility | 11 Education | 12 Economy & Employment |
|----------------|--------------------------------|--------------------------------|----------------------------------|----------------------------|------------------------|------------------------|--------------|-------------------------|------------------------|---------------------------------|-----------------|----------------------------|
| 082 | +/- | + | - | - | - | - | + | - | - | - | - | - |

Figure 6.1: Significance of effects pre-mitigation, Site Ref: 082

| Site Reference | 1 Climate Change Mitigation | 2 Climate Change Adaptation | 3 Biodiversity & Geodiversity | 4 Landscape & Townscape | 5 Pollution & Waste | 6 Natural Resources | 7 Housing | 8 Health & Wellbeing | 9 Cultural Heritage | 10 Transport & Accessibility | 11 Education | 12 Economy & Employment |
|----------------|--------------------------------|--------------------------------|----------------------------------|----------------------------|------------------------|------------------------|--------------|-------------------------|------------------------|---------------------------------|-----------------|----------------------------|
| 082 | +/- | + | +/- | 0 | - | - | + | - | 0 | - | - | - |

Figure 6.2: Significance of effects post-mitigation, Site Ref: 082

5.5 Cameron Homes broadly supports the scoring within the SA, particularly that which factors in mitigation which may be delivered by development. It is noted that the scoring is particularly favourable when compared against other sites within the SA, thereby justifying the allocation of the site within the LPR.

Site Selection

5.6 The Housing Site Selection Topic Paper 2021 includes, at Appendix 3, a proforma of each site and assesses against various criteria. Land East of School Lane, Coven is assessed under site reference 082. It should be noted that the topic paper assesses a wider site (5.47ha). This representation is concerned with a portion of this site that was previously safeguarded and associated access.

5.7 The first criteria is concerned with conformity with infrastructure-led strategy and opportunities for infrastructure delivery. The LPR does not identify Coven as a location for additional Green Belt release and instead focuses on delivering housing growth through existing commitments, allocations and safeguarded sites. This proposed allocation is consistent with this approach as it was allocated as safeguarded land in the Site Allocation Document. The Paper notes that the site does not appear to have footway access into the wider area. The Indicative Layout (**Appendix 1**) shows how the site could be connected to the existing footpath provision on School Lane which will provide a link to the village centre, including bus stops.

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- 5.8 The sequential test refers to Green Belt release. The site is not located in the Green Belt having been removed by a previous Local Plan. Allocation of this site therefore represents a continuity of the plan-led approach to the Green Belt in the District.
- 5.9 In terms of Green Belt harm, the topic paper states there is moderate harm for the non-safeguarded part of the site. As set out above and shown on the Indicative Masterplan the housing development is contained within the safeguarded site. The proposed access via School Lane is outside of the boundary of the safeguarded land however is referred to in the adopted Site Allocations Document and the emerging LPR. The access road does cross land outside of the safeguarded site. This is the access arrangement identified in the SAD and LPR for the safeguarded site. This will require the relocation of the existing play area and football pitch. Cameron Homes are open to working with the Council to deliver this. Cameron Homes will also review all access options for this site and discuss with the Council if an alternate access solution can be identified.
- 5.10 The topic paper states that the landscape sensitivity of the site is moderate. It should be noted that the site is enclosed by existing residential development on two sides and a main arterial road on a third. Only the northern boundary is more open to the existing play facilities to the north and this reads as part of the settlement rather than the existing countryside. The site is well-contained and would read as a logical extension to the village, rounding off the edge.
- 5.11 The topic paper scores the site green for both direct and indirect potential harm to the historic environment and confirms there are no concerns identified. This is supported by Cameron Homes. The topic paper notes that archaeological mitigation measures may be required. This can be secured through the development management process by way of appropriately worded conditions.
- 5.12 The known site constraints listed are the lack of a footway on School Lane, removal of an agricultural field, minerals safeguarding and the well planted boundary along School Lane presenting a barrier to access. The Indicative

Masterplan demonstrates how access could be achieved from School Lane. It also shows how the site would connect into the existing footpath provision on School Lane to the south which does connect to the village centre via Brewood Road. In terms of minerals, the site is relatively small for mineral extraction and located in close proximity to existing residential properties therefore any extraction would likely be unacceptable due to amenity concerns for nearby residents.

5.13 The Lead Local Flood Authority have confirmed that the site is at low risk of flooding. The County Highways Authority have confirmed the site is acceptable in principle. The HA also identify vehicular access off School Lane and the relation of existing play facilities. Any alternative access options will also be discussed with the HA. The HA response also note the need for pedestrian connectivity to the main village and A449. The Indicative Masterplan shows the footpath connections to School Lane and pedestrian access to the A449 could be achieved via the proposed public open space.

5.14 In terms of site opportunities, the topic paper notes that the site is regularly shaped and offers good permeability providing the opportunity to achieve high quality design. The site is noted to have strong boundaries to the east, south and west and the opportunity to integrate the site with the existing POS to the north. The Indicative Masterplan reflects these opportunities and illustrates how the site could be developed to achieve a high quality scheme, with on-site POS which links to existing facilities to the north.

5.15 The proforma concludes that the safeguarded site could deliver the Council's preferred spatial strategy if allocated. This is supported and justifies the safeguarded site's status as a proposed allocation.

Suitability

5.16 As set out above, the site is entirely suitable for the proposed allocation. It should be noted that the site has already been considered for residential use and was removed from the Green Belt through the Site Allocations Document, which was subject to Examination. The safeguarding of the site was found to

be sound and this representation demonstrates that the full allocation of this site follows the plan-led approach and will contribute towards delivering the spatial strategy for the District.

Deliverability

5.17 Cameron Homes have control of Land East of School Lane. As set out in the preceding section, the site is not subject to any overriding constraints that would preclude development. The site is available now and, as a non-Green Belt site, could come forward immediately to deliver housing and community benefits.

6.0 CONCLUSION

- 6.1 This representation is made by Pegasus Group on behalf of Cameron Homes to the South Staffordshire Local Plan Review, Preferred Options (Regulation 18) consultation. This representation relates to Land East of School Lane, a preferred option allocation. This site was a safeguarded site in the currently adopted Site Allocations Document and its proposed allocation represents continuity of the plan-led approach to delivering housing growth in the District.
- 6.2 Cameron Homes are generally supportive of the Council's spatial strategy which apportions growth appropriately between the various tiers of settlements in the District. Comments have also been provided to assist in refining the development management policies and further comments will be provided when draft policy wording is published.
- 6.3 This representation has demonstrated that the Land East of School Lane, Coven is available, suitable and deliverable. It is therefore submitted that Land East of School Lane represents a sound housing allocation.

APPENDIX 1

SKETCH CONCEPT IS SUBJECT TO:
 * PLANNING APPROVAL
 * HIGHWAY DESIGN AND APPROVAL
 * CIVIL ENGINEERING DESIGN
 * ARBORICULTURAL REPORT
 * UTILITIES APPRAISAL



Coven Masterplan

Sketch Layout SK004

