



South Staffordshire District Council
Local Plan Review
2018 - 2038

Preferred Options

December 2021



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1 INTRODUCTION

1.1 Context

- 1.1.1 Gladman welcome the opportunity to comment on the Preferred Options version of the South Staffordshire Local Plan Review. Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.
- 1.1.2 Gladman has been involved throughout the plan preparation process of the emerging South Staffordshire Local Plan Review, having previously submitted representations on the Issues and Options consultation in November 2018 and the Spatial Housing Strategy and Infrastructure Delivery consultation in December 2019.
- 1.1.3 Gladman are supportive of the Council in the preparation of the Local Plan Review and are keen to remain involved throughout the process through to adoption.
- 1.1.4 Gladman currently have land interests within South Staffordshire and further detail is provided in the site submission chapter of this representation.
- 1.1.5 Specifically, Gladman support the proposed housing allocation of Land at Weeping Cross, which is a draft allocation under Policy SA5 with an indicative minimum capacity of 168 homes. This site presents a sustainable opportunity for the delivery of new housing within the district at a location which is not in the Green Belt. More broadly, Gladman support the Council's proposed housing requirement which accommodates a proportionate contribution to the unmet needs of the GBHMA.
- 1.1.6 Notwithstanding the above, we suggest that some of the development management policies require fine tuning before the next round of consultation and suggest that further flexibility is incorporated within finalised policy wording.

1.2 Plan Making

1.2.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

- 2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, South Staffordshire District Council (SSDC) must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 2.1.3 The revised NPPF introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more SoCGs, throughout the plan making process¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the

¹ PPG Reference ID: 61-001-20180913

process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.

2.1.4 Paragraph 7.3 of the consultation document details that a draft Statement of Common Ground with neighbouring authorities to formally agree contribution to unmet needs and cross boundary infrastructure delivery will be drafted prior to the next round of consultation.

2.1.5 It is evident that the Council have held an active role in cross-boundary planning matters in preparing the Local Plan Review to its current form. This is illustrated through the November 2021 Duty to Cooperate Topic Paper which provides an overview of the cross-boundary, strategic issues that have been addressed to date through the preparation of the Local Plan Review.

2.1.6 It is well documented that Birmingham City and the Black Country Authorities do not have sufficient land to suitably accommodate their housing requirement against the current iteration of the Standard Method. The topic paper details the formal cooperation arrangements that have been established and followed with neighbouring local planning authorities and other relevant bodies in order to secure on-going cooperation on this matter.

2.1.7 The Duty to Cooperate will therefore play a significant part in re-distributing housing growth across the wider HMA. It is essential that the Council continues engagement with other local authorities to ensure that the unmet housing need is addressed in a strategic and sustainable manner.

2.2 Sustainability Appraisal

2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken

at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.

- 2.2.2 SSDC should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the authority's decision-making and scoring should be robust, justified and transparent.

3 NATIONAL PLANNING GUIDANCE

3.1 National Planning Policy Framework

3.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced.

3.1.2 The NPPF requires that plans set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

3.1.3 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social and environmental priorities and to help shape the development of local communities for future generations.

3.1.4 In particular, paragraph 16 of the NPPF states that Plans should:

"a) Be prepared with the objective of contributing to the achievement of sustainable development;

b) Be prepared positively, in a way that is aspirational but deliverable;

c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

- 3.1.5 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the South Staffordshire Local Plan Review (SSLPR) provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.
- 3.1.6 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 3.1.7 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 68 sets out specific guidance that local planning authorities should consider when identifying and meeting their housing needs, with Annex 2 of the Framework providing definitions for the terms "deliverable" and "developable".
- 3.1.8 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so, or the application of certain policies in the Framework would provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), local authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see paragraph 35 of the NPPF).
- 3.1.9 The July 2021 revision to the NPPF provides greater focus on the environment, design quality and place-making alongside providing additional guidance in relation to flooding setting out a Flood Risk Vulnerability Classification at Annex 3, the importance of Tree-lined streets and amendments to Article 4 directions. Additionally, Local Plans which have not yet progressed to Regulation 19 stage should ensure that where strategic developments such as new settlements or significant extensions are required, they are set within a vision that looks ahead at least 30 years (See paragraph

22). Further consideration on this matter is detailed at section 4.5 of this representation.

3.1.10 The amendments coincide with the publication of the National Design Guide and National Model Design Code, a toolkit which helps local communities to shape local design needs and provide guidance for creating environmentally responsive, sustainable and distinctive places with a consistent and high-quality standard of design.

3.2 Planning Practice Guidance

3.2.1 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the Framework should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes to the PPG related to defining housing need, housing supply and housing delivery performance.

3.3 National Planning Policy Consultations and Levelling Up Agenda

3.3.1 In August 2020, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals sought to streamline and modernise the planning process. A further consultation on immediate changes to the current planning system was also published in August 2020². Of significant note was the proposed revised standard method for calculating local housing need, which proposed to incorporate a percentage of existing stock as the baseline of the calculation.

3.3.2 In December 2020 the Government detailed that the most appropriate approach to local housing need proposals was to retain the standard method in the current form, with an additional 35% uplift to the 'post-cap number' for the 20 largest local authorities. The latest correspondence from Government regarding the revisions to

² Ministry of Housing, Communities & Local Government: Changes to the Current Planning System Consultation <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

the standard method for calculating local housing need will, therefore, not affect the minimum local housing need which SSDC should plan for.

3.3.3 New housing secretary Michael Gove has paused reform of the planning system to enable a full review of the proposed changes. However, he also indicated he would not abandon the proposed changes wholesale. A final government response to feedback on the planning white paper is expected in early 2022.

3.3.4 It is likely that any future proposals for planning change will be channelled through the prism of the government's levelling up agenda, with a forthcoming levelling-up white paper expected to be published in January 2022. SSDC should be cognizant, therefore, of the wider 'Levelling Up' agenda and consequential implications it could have on the planning system, including possible changes to the standard method which could have significant impacts on the level of growth required across the Greater Birmingham Housing Market Area.

4 LOCAL PLAN PREFERRED OPTIONS VERSION

4.1 Background

4.1.1 South Staffordshire's currently adopted local plan is twofold. The first part comprises the South Staffordshire Core Strategy (CS) which was adopted in December 2012. The Core Strategy sets out the planning framework for guiding the location and level of development in the district up until 2028.

4.1.2 The second part comprises the Site Allocations Document (SAD) which is the daughter document to the CS. The SAD was adopted in September 2018 and sets out site specific proposals and development management policies for the district.

4.1.3 The SAD commits SSDC to carrying out an early review of the Local Plan to respond to the increasing need for development, both within South Staffordshire and in neighbouring authorities. The Local Plan Review also provides the opportunity for the Council to respond to the numerous significant changes to the planning system since the CS was adopted in 2012.

4.1.4 The Preferred Options Version of the Local Plan Review marks the third stage of public consultation. It builds upon previous consultations and sets out the proposed site allocations, development strategy and development management policy direction for the District. Through this submission, Gladman have highlighted areas where the Local Plan Review requires further clarification or justification prior to consultation on the Publication Plan which is anticipated to take place in summer 2022.

4.2 Evidence Base

4.2.1 **Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan?**

4.2.2 To ensure the key aspirations and objectives of the Local Plan Review are realised, it is imperative that the Local Plan Review is underpinned by a robust evidence base. In this regard, Gladman are encouraged that Appendix A lists over 30 evidence base studies, many of which have been prepared or updated during the past 18 months.

- 4.2.3 The evidence base appears to reflect the most up-to-date evidence for the district. Nonetheless, we reserve the right to comment on evidence base documents at further stages of public consultation, should we consider it necessary.

4.3 Vision and Strategic Objectives

- 4.3.1 **Have the correct vision and strategic objectives been identified, and do you agree that the draft policies and the policy directions will deliver these objectives?**

- 4.3.2 Chapter 3 of the Local Plan Review sets out the vision and strategic objectives for South Staffordshire to 2038. The Council's vision is to protect and enhance the distinctive rural character, communities, and landscape, of South Staffordshire whilst creating beautiful and thriving new places in which people can live, work, and play. Gladman are supportive of this vision. The vision is supported by 13 strategic objectives which are centred around the four key themes of development strategy, homes and communities, economic vibrancy, and the natural and built environment.

- 4.3.3 Gladman are broadly supportive of several of the Council's strategic objectives, including the commitment to meeting the housing needs of the District whilst making a proportionate contribution towards the unmet needs of Great Birmingham Housing Market Area (GBHMA), providing housing to meet the needs of different groups of the community, and ensuring that communities are resilient and adaptable to the effects of climate change. Consideration of the draft policies and draft policy directions, and how these will deliver the vision and strategic objectives, are considered further in the subsequent sections of this representation.

4.4 Spatial Housing Strategy

- 4.4.1 **Do you support the policy approach in Policy DS3? If no, please explain how this policy should be amended.**

Housing Requirement

- 4.4.2 National planning guidance is clear that the standard methodology is merely the starting point for calculating housing need and there will be circumstances where it

is appropriate to plan for a higher level of need than the standard model suggests, including where an authority is agreeing to take on unmet need for neighbouring authorities.

- 4.4.3 Policy DS3 outlines that SSDC will deliver a minimum of 8,881 dwellings over the plan period 2018 to 2038. This comprises 4,131 dwellings predicated on the local housing need (LHN) figure for South Staffordshire and a contribution of 4,000 dwellings towards meeting the unmet housing need arising from the GBHMA over the plan period 2018 – 2038. This equates to an average of 444 new homes each year.
- 4.4.4 Gladman are supportive of the housing requirement as proposed as it represents a significant uplift above the minimum housing requirement set by the standard method in accordance with national planning guidance. This positive and proactive approach to addressing some of the housing shortfall arising from the GBHMA is welcomed.
- 4.4.5 The uplift above the minimum housing requirement set by the standard method also has additional benefits in terms of affordability pressures in the district. Gladman note that the SHMA published in May 2021 outlines that there is a total need for 128 affordable homes each year in the district. If the housing requirement were to be based exclusively on the LHN figure of 243dpa, it is considered highly unlikely that this affordable need would be delivered. However, total annual affordable housing need in South Staffordshire of 128dpa represents 28.8% of the proposed level of growth and the Council can therefore be confident that the affordable housing need identified in the SHMA will be addressed by the proposed housing requirement.
- 4.4.6 Utilising an uplifted housing requirement will also help the Council mitigate some of the economic impacts from the pandemic by securing a larger proportion of housebuilder contributions.
- 4.4.7 Table 8 of the consultation document sets out how a combination of extant planning permissions and allocations, land safeguarded in the SAD and new allocations will deliver approximately 10,000 new homes over the emerging plan period. This would

provide a flexibility of 12% above the proposed minimum overall housing requirement.

- 4.4.8 The allocation of surplus housing land through the Local Plan Review in contrast to the proposed housing requirement is welcomed. This surplus will help secure a significant boost in housing land supply, heighten the deliverability of the defined housing requirement, and ensure that the Local Plan Review has greater durability to any changes which may occur over the plan period. It will also ensure a minimum of five years' worth of housing land is maintained in accordance with paragraph 74 of the NPPF.
- 4.4.9 Whilst welcome, Gladman consider that the level of surplus land falls slightly short of what would be required to ensure the Local Plan Review remains robust over the plan period. To enhance the deliverability of the Local Plan Review, Gladman recommend that the surplus in supply is should be increased, in this instance, to at 15-20% of the proposed housing requirement.
- 4.4.10 Given the current surplus is approximately 12%, it may not be strictly necessary to allocate additional sites to achieve a 15-20% buffer. Rather, the Council should consider which of the proposed allocations could achieve a higher site density and in turn accommodate additional dwellings. This would be in line national planning policy as set out in paragraphs 124 and 125 of the NPPF in making efficient use of land and would also protect the ongoing function of the Green Belt.

Spatial Strategy

- 4.4.11 Gladman are broadly supportive of the spatial strategy detailed in policy DS3. The pattern of development is focussed on locating the bulk of new development at the District's most accessible and sustainable locations. This approach focuses most of the new growth at the most sustainable settlements in the district; the Tier 1 and Tier 2 settlements in addition to areas adjacent to neighbouring towns and cities.
- 4.4.12 Given that over 80% of South Staffordshire is designated as Green Belt, the need to alter Green Belt boundaries to accommodate the proposed housing requirement constitutes exceptional circumstances. Nonetheless, whilst national policy accepts

Green Belt boundaries should change where required to accommodate identified needs, preference should be given to meeting needs on non-greenbelt sites first.

- 4.4.13 Encouragingly, the strategy recognises that growth adjacent to the town of Stafford can facilitate sustainable growth at a non-greenbelt location. This commitment is welcome by Gladman. Nonetheless, we feel that further consideration should be given to whether this non-greenbelt location could accommodate a larger scale of growth, thereby minimising alterations to the Green Belt boundaries. We note that the recommendations of the GBHMA Strategic Growth Study discounted the wider broad location for large scale growth however we contend that this sustainable, non-greenbelt location can accommodate a larger scale of growth than currently planned for in the Local Plan Review. We would welcome discussions with the Council on this matter.
- 4.4.14 Overall, Gladman support spatial strategy and consider this to reflect the key spatial influences of the district and the sustainability and capacity of these areas to absorb new development. The proposed spatial strategy ensures that new housing will be accommodated proportionately across the district, resulting in less pressure on infrastructure in any one area, promoting housing delivery through increased choice in location, and ensuring that the development needs and sustainability requirements of the district's rural settlements are sensitively considered.
- 4.4.15 **Do you support the policy approach in Policy DS4? If no, please explain how this policy should be amended.**
- 4.4.16 Paragraph 22 of the NPPF states that Local Plans which have not yet progressed to Regulation 19 stage should ensure that where strategic developments such as new settlements or significant extensions are required, they are set within a vision that looks ahead at least 30 years.
- 4.4.17 Policy DS4 sets out the Council's long-term aspiration to explore potential options within the district for a sustainable, independent new settlement. The policy makes clear that it is not anticipated that a new settlement would contribute to housing

growth across the emerging local plan period to 2038, rather it would form a key option that the Council will consider in future plan-making.

- 4.4.18 It is noted that policy DS4 and the supporting text identify the transport corridor formed by the A449 and West Coast Mainline between Wolverhampton and Stafford as a potential area of search for such proposals. Whilst the identification of an area of search is welcomed, Gladman consider that there is merit in the next stages of the Local Plan Review taking this a step further and expanding DS4 further to consider a series of “broad locations for growth”, identified to respond to the long-term aspirations for a sustainable new settlement.
- 4.4.19 These areas could remain as a series of “broad locations for growth” identified on the Key Diagram within the Local Plan Policies Map, with the specific need for and requirements of developing these areas considered through supplementary planning documents or a focused review of the new Local Plan.
- 4.4.20 Given the Council’s clear longer term growth aspiration and the current stage of plan-making, Gladman suggest that the Council consider extending the plan period to 30 years (i.e. 2018 to 2048) in line with the new guidance contained within the NPPF. This would not necessitate significant changes to the Local Plan Review, but it would establish a pragmatic approach to the possibility that a new settlement is required in the district to accommodate long-term growth needs.

4.5 Site Allocations

4.5.1 **Do you support the proposed housing allocations in Policy SA5?**

- 4.5.2 Chapter 5 of the consultation document details the site selection process that has been undertaken to inform the Local Plan Review and then sets out the proposed allocations identified to meet the proposed minimum housing requirement of 8,881 dwellings over the plan period.
- 4.5.3 There are four strategic allocations detailed in Policies SA1 – SA4. Whilst Gladman have no site-specific comments to make on these allocations we recommend that due consideration is given to the expected delivery on these strategic allocations as

the Local Plan Review progresses. These sites are clearly a significant component of anticipated housing delivery in the district, and it is therefore crucial that forecasted delivery at these locations is based on realistic and well evidenced assumptions.

- 4.5.4 In this respect, a useful starting point is the updated Lichfields Start to Finish report, which is a useful contextual document when trying to derive a future trajectory for a site.
- 4.5.5 Policy SA5 sets out 35 non-strategic housing allocations which will be delivered to meet the district's housing target up to 2038. It is expected that all site allocations will be delivered in accordance with the individual site planning requirements set out in the appendices to the LPR, and any other mitigation which is deemed necessary through the development management process.
- 4.5.6 In broad terms, it is considered that the identified supply provides for a good range of sites which are distributed across the District. The Council's approach avoids the overconcentration of development meaning that pressure on existing services and infrastructure is likely to be limited and provides for added market choice, enhancing delivery rates. It will also ensure that housing needs and pressures in the market are met, enhancing the effectiveness of the Local Plan in addressing key issues for the plan area.
- 4.5.7 The allocation of non-strategic scale sites also means that the uplift in housing land supply required to meet the housing requirement is likely to be achievable in the short term.

Land at Weeping Cross (adjoining Stafford Borough) 036c

- 4.5.8 Land at Weeping Cross is identified as a housing allocation, with an indicative minimum capacity of 168 dwellings. The site represents a sustainable and suitable location for development, in a non-Green Belt location. The site provides a logical extension to the adjacent built form, which can be accommodated without adverse environmental harm and is the only location where this level of development could be sustainably achieved adjacent to Stafford in the District. Gladman can confirm that the site is available for housing in the short term.

- 4.5.9 Subject to the adoption of the Local Plan Review, it is estimated that construction could start on site as early as 2025. A rate of 40 dwellings per annum would see the site completed within 5 years of commencement; comfortably within the emerging plan period and enabling a significant contribution to be made to the five-year supply.
- 4.5.10 Whilst Gladman are supportive of the current Local Plan Review allocation, we consider that the allocation of the site for a minimum of 180 dwellings would best reflect the evidence-based constraints and opportunities of the site and the wider area, and its capacity to absorb growth. Full details of dwelling numbers will be explored through planning applications when detailed assessments are made with regards to matters such as highways, density and character. Achieving an appropriate level of development, considering its urban edge location, better reflects national planning policy as set out in Paragraphs 124 and 125 of the NPPF in making efficient use of land.

4.6 Development Management Policies

- 4.6.1 **Do you agree with the proposed policy approaches set out in Chapter 6?**
- 4.6.2 Chapter 6 sets out the Council's preferred approaches in respect of Development Management policies, which it intends to take forward through the next stages of the Local Plan Review. Set out below are Gladman's views on certain policy directions as drafted.
- 4.6.3 Gladman reserve the right to comment on all development management policies at the next stage of consultation when draft policy wording will be provided.

HC1 Housing Mix

- 4.6.4 Policy H1 will look to provide a mixture of property sizes, types, and tenures on new residential development. Gladman are concerned that the direction of travel for Policy H1 is overly prescriptive, in seeking to achieve 75% of market housing to have 3 bedrooms or less.

- 4.6.5 Housing mix should be considered on a site-by-site basis, taking account of the latest available evidence on housing need at the time an application is submitted. Further flexibility is required in the final wording of Policy H1.

HC3 Affordable Housing

- 4.6.6 Gladman can confirm that its allocation at Land at Weeping Cross (036c) can deliver the emerging policy requirement of 30% affordable homes, or the adopted policy at the time any future planning application is determined.

HC4 Homes for Older People

- 4.6.7 The direction of travel for Policy H4 sets out that proposals for major residential development will be required to make a clear contribution to meeting the districts ageing population, through the provision of either general needs properties for older people (e.g bungalows, ground floor accommodation) or specialist accommodation (e.g sheltered, extra care homes). 30% of all market and affordable homes will be required to meet Building Regulations Standard Part M4(2).
- 4.6.8 Gladman contend that Policy HC4 should consider the nature and scale of provision for older people on a site-by-site basis depending on demand in a particular area and site suitability. There should not be a blanket requirement across all major residential development schemes. The supporting text to Policy H4 should also contain further guidance on the types of provision that would meet this policy requirement.

HC7 – Self and Custom Build Housing

- 4.6.9 Gladman would broadly support the inclusion of a policy in respect of self-build and custom-build housing in line with current government thinking and objectives. Generally, the policy direction of travel appears suitably flexible, stating that provision will be agreed on a site-by-site basis.
- 4.6.10 Gladman recommend that the final policy wording also states that once a self-build and/or custom-build plot has been marketed for 12 months but failed to be sold, it will revert to consideration by the Council to be built out as conventional market housing.

- 4.6.11 Deliberation should also be given to providing a positive policy framework which promotes the delivery of such products through windfall development adjacent to settlements falling within Tiers 1-4 of the settlement hierarchy.

HC9 – Design Requirements

- 4.6.12 A key aspiration for the Local Plan Review is to ensure beautiful and high-quality design across the district. The direction of travel set out under policy H9 articulates the Council's aspirations to create beautiful places.
- 4.6.13 Gladman are broadly supportive of the direction of travel for policy H9. Nonetheless, the final policy wording for H9 should not be overly prescriptive and should also reflect that, whilst it is important, good design should be considered at the most appropriate stage of the planning process (the detailed application stage) to avoid unnecessary delay on matters of detail at the outline stage.

HC12 – Parking Standards

- 4.6.14 In respect of electric vehicle charging standards, new homes and buildings in England will be required by law to install electric vehicle charging points from next year. For this reason, Gladman consider that detailed design issues such as this, should be left for the Building Regulation process.

NB2 – Biodiversity

- 4.6.15 Gladman would support a development management policy which aligns with the Government's proposals within the Environment Bill 2019-2021, which imposes a mandatory requirement for development to achieve a 10% net gain in biodiversity. It is the view of Gladman that the Council should not look to set a requirement over and above the 10% biodiversity net gain that the Government is seeking to legislate.

5 SITE SUBMISSION PROFILES

5.1 Policy SA5 – Land at Weeping Cross (adjoining Stafford Borough Boundary) 036c

- 5.1.1 As identified previously in these representations, Gladman are supportive of SSDC's decision to allocate land to at Weeping Cross, to the west of Cannock Road and south of Hazelstrine Lane (site location plan shown in Figure 1 below), in accordance with draft Policy SA5. Gladman submit that the site represents a sustainable and logical location to deliver sustainable, residential development.

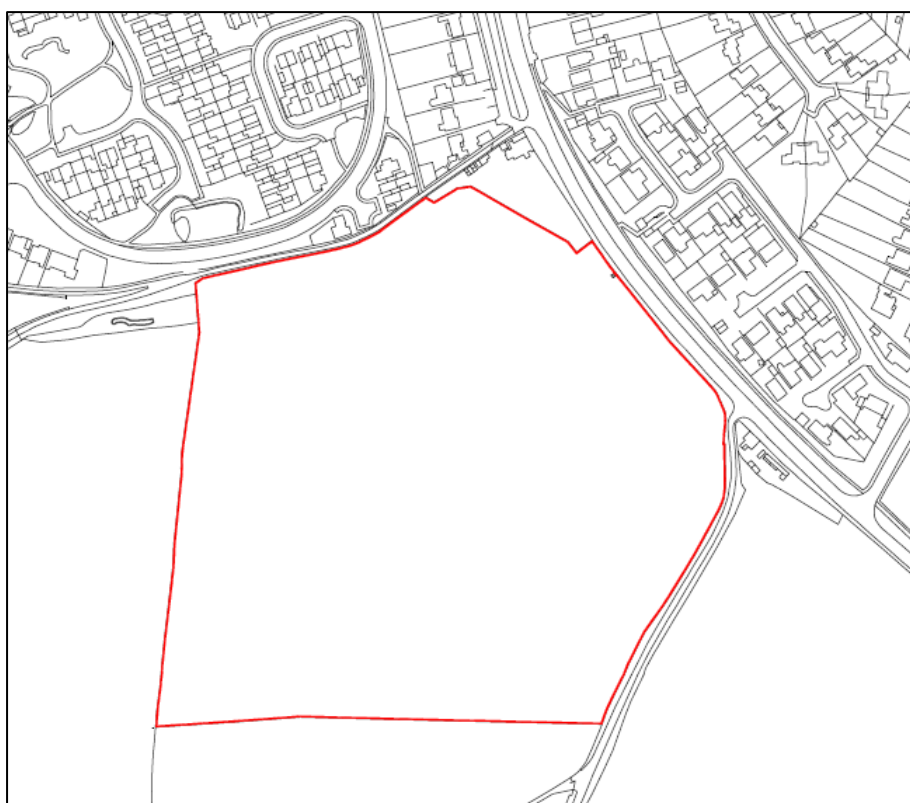


Figure 1 - Site Location – Land at Weeping Cross

- 5.1.2 Land at Weeping Cross is not subject to any technical, landownership or viability constraints which would preclude their development. The site is being actively promoted on behalf of the landowners and can be delivered in the short term. The remainder of this section describes the site's suitability for residential development in further detail, taking account of the technical studies that have been undertaken to support the delivery of the site to date, and SSDC's proposed policy approaches.

New Homes

- 5.1.3 Whilst Gladman are supportive of the current Local Plan Review allocation, we consider that the allocation of the site for a minimum of 180 dwellings would best reflect the evidence-based constraints and opportunities of the site and the wider area, and its capacity to absorb growth. Full details of dwelling numbers will be explored through planning applications when detailed assessments are made with regards to matters such as highways, density and character. Achieving an appropriate level of development, considering its urban edge location, better reflects national planning policy as set out in paragraphs 124 and 125 of the NPPF in making efficient use of land.
- 5.1.4 The site can deliver a wide range of market and affordable homes to meet the district's general and specialist housing needs. Gladman can confirm that the site can deliver the emerging policy requirement of 30% affordable homes, or the adopted policy at the time any future planning application is determined.

Community Facilities and Viability

- 5.1.5 Proportionate developer contributions towards the delivery of new community infrastructure would be provided alongside any proposals. Gladman is willing to agree to all requests for developer contributions which meet the relevant requirements of paragraph 57 of the NPPF and CIL regulations 122 and 123.

Open Space and Green Infrastructure

- 5.1.6 Generous areas of informal and formal open space will underpin the proposals for the site. This would include the provision of areas of play for children. The total area of open space provided as part of the site's development would meet SSDC's requirements.

Climate Change and Energy Efficiency

- 5.1.7 South Staffordshire have declared a climate emergency and Gladman is committed to contributing towards providing solutions to address these concerns. We take the climate crisis seriously and Land at Weeping Cross can deliver numerous

environmental commitments to assist the Council in meeting its climate related strategies. The site is in a sustainable location, minimising the need to travel further afield, and the consequent vehicle related emissions. Charging points for electric vehicles will be provided in accordance with Building Regulations to future-proof the development.

- 5.1.8 Well-designed open space will support an active lifestyle, by encouraging people to walk and cycle. New planting will assist in terms of climate change resilience, by providing shading and CO2 absorption.
- 5.1.9 Renewable energy technologies will be considered at the detailed design stage. Such proposals will follow energy performance and efficiency targets, using a fabric-first approach to construction with the aim of reducing CO2 emissions. Detailed design measures could include; orientation of new homes to take advantage of heat energy, the potential for photo-voltaic panels to be used across the scheme, maximising air-tightness and insulation, and incorporating a sustainable heating and ventilation strategy, in line the 2025 future homes standards and changes to Part 1 of the Building Regulations

Flood Risk Mitigation

- 5.1.10 Technical work undertaken to date has confirmed that the site is located within Flood Zone 1 (the area at the lowest risk of flooding). The site, therefore, can be developed safely in relation to flood risk and flooding would not pose a constrain to the development of the site.
- 5.1.11 A comprehensive Flood Risk Assessment has previously been prepared for the site which demonstrated that the development of the site would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, can reduce flood risk overall. A new FRA will be prepared to support any future planning application in accordance with the latest guidance/policy.

Highways and Sustainable Transport

- 5.1.12 Vehicular access to the site will be taken from Cannock Road, likely via a simple priority junction. Previous applications³ for the site raised no in-principle highways objections and the Highway Authority have confirmed in the *Housing Site Selection Topic Paper – Appendix 2 Highways Comments* that the site allocation is ok in principle from a highways perspective.
- 5.1.13 The site benefits from good pedestrian connectivity to Stafford Town and the suburb of Weeping Cross, and there are a wide range of local amenities and facilities which can be accessed on foot, by cycle or by public transport within nationally recognised acceptable walking and cycling distances. Facilities such as convenience shops, a pharmacy, public houses, primary schools, a high school, and business park are within the CIHT ‘preferred maximum walking distance’ guidance.
- 5.1.14 The nearest bus stop is located on Wildwood Drive with a further two bus stops on Cannock Road. All bus stops in proximity to the site are located within the CIHT recommended maximum walking distance of 400m and can be reached from the site within 5 minutes’ walk. Cannock road offers regular bus services into Stafford Town Centre and Cannock, which offers several higher-level services and employment opportunities.

Site Specific Statement of Common Ground

- 5.1.15 Paragraph 7.3 of the LPR sets out that the Council will look to draft SoCG with the promoters of preferred sites prior to regulation 19 consultation. Gladman are committed to continued engagement with the Council in respect of Land at Weeping Cross and we look forward to discussing the development, that, together, we could deliver and agreeing a SoCG to support the sites allocation through the local plan process and subsequent delivery.

³ 17/00505/OUT & 18/01031/OUT

6 CONCLUSIONS

6.1 Summary

- 6.1.1 Gladman welcomes the opportunity to comment on the Preferred Options Version of the South Staffordshire Local Plan Review. These representations have been drafted with reference to the revised National Planning Policy Framework and the associated updates that were made to Planning Practice Guidance.
- 6.1.2 Gladman are supportive of the Council in preparing the Local Plan Review and welcome the proactive and positive approach taken by the Council in accommodating a significant proportion of the unmet housing need arising from the GBHMA in a sustainable manner.
- 6.1.3 Specifically, Gladman welcome the allocation of land at Weeping Cross under Policy SA5. Gladman submit that this site represents a sustainable and logical location in which to deliver sustainable residential development. The site is not subject to any technical, landownership or viability constraints that would preclude development. The site is being actively promoted on behalf of the landowners and can be delivered in the short term to contribute towards South Staffordshire's emerging housing needs.
- 6.1.4 More broadly, Gladman are supportive of the Council's contribution to the unmet housing needs arising from the Greater Birmingham HMA. This approach is in line with national policy and practice guidance and provides a positive approach to growth in South Staffordshire to ensure the vision and objectives of the Local Plan can be delivered.
- 6.1.5 Gladman request to be kept informed of the progress with the Local Plan Review and we would welcome the opportunity to further engage with the Council as the Local Plan Review progresses.

