

SOUTH STAFFORDSHIRE LOCAL PLAN 2018-38 PREFERRED OPTIONS

CROSS GREEN

ON BEHALF OF TAYLOR WIMPEY UK LTD

Taylor
Wimpey

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

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1. Introduction

1.1 This representation, submitted on behalf of Taylor Wimpey UK Ltd, responds to the Regulation 18 'Preferred Options' consultation document and accompanying published evidence, having regard to the national and local planning policy context. It relates specifically to Land at Cross Green where Taylor Wimpey has secured land interests. A site location plan is attached at Appendix 1.

1.2 The representations are framed in the context of the requirements of Local Plans to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Development Plan to be sound it must be:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet 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 the Framework and other statements of national planning policy, where relevant.

1.3 These representations also give consideration to the legal and procedural requirements associated with the plan-making process.

2. Planning Policy Context

2.1 Taylor Wimpey supports South Staffordshire District Council in progressing with a review of the South Staffordshire District Plan as required by Policy SAD1. This provides the opportunity for the Council to comprehensively review the following matters:

- South Staffordshire's own objectively assessed housing need and the potential for housing supply within the District (including existing safeguarded land identified through the Site Allocations Document) to meet this need.
- The potential role of housing supply options within the District to meet unmet cross boundary needs from the wider Greater Birmingham Housing Market Area (GBHMA), including from the Black Country.
- Employment land requirements for South Staffordshire
- South Staffordshire's potential role in meeting wider unmet employment needs through the Duty to Co-operate.
- The appropriateness of the existing settlement hierarchy and the strategic distribution of growth in light of new housing and employment needs.
- The need for further additional safeguarded housing and employment land for longer term development needs, and the role of safeguarded land in meeting housing shortfalls across the GBHMA, including South Staffordshire's own needs.
- Gypsy, Traveller and Travelling Showpeople provision.
- A comprehensive Green Belt Review undertaken jointly with the Black Country authorities, to inform any further Green Belt release to accommodate new development within the District.

2.2 The National Planning Policy Framework (NPPF 2021) requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years.

2.3 Taylor Wimpey supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up to date policy framework exists with the District to guide growth to 2038 and to ensure that development is genuinely plan-led.

2.4 The Preferred Options consultation document follows the identification of the Council's preferred spatial housing strategy in October 2019, which identified a proposed settlement hierarchy and an approach to delivering infrastructure-led development in line with settlement hierarchy and larger urban extensions focused to the north of the Black Country conurbation.

2.5 The Preferred Options consultation document identifies preferred site allocations to meet the preferred strategy, including Land at Cross Green which is included as a proposed Strategic Development Location (Policy SA2).

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the Local Plan?

2.6 Appendix A identifies a broad range of evidence documents to be relied upon by the Council in formulating the Local Plan.

2.7 Concern is raised that the following documents, which were referenced in the Spatial Housing Strategy consultation document are no longer listed:

- Greater Birmingham HMA Strategic Growth Study.
- Strategic Housing & Employment Land Availability Assessment

2.8 The Greater Birmingham HMA 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 EiP and provides justification for the Council's intended contribution of 4,000 homes to assist in meeting the identified housing shortfall.

2.9 The Strategic Housing & Employment Land Availability Assessment (SHELAA) establishes the broad range of site options to be tested by the Council in determining the appropriate housing and employment allocations necessary to meet identified needs.

2.10 In addition, 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.

Question 2: Do you agree that the correct infrastructure to be delivered alongside proposed site allocations has been identified in the IDP?

- 2.11 Taylor Wimpey supports the Council's proposed infrastructure led strategy which seeks to focus development towards larger and better-connected settlements and where appropriate deliver new infrastructure benefits alongside new development.
- 2.12 Land at Cross Green is a larger strategic proposal that can facilitate significant infrastructure provision. The site can deliver the following emerging infrastructure opportunities identified within the Infrastructure Delivery Plan 2021 (IDP):
- Delivery of Road Option 7 to serve ROF Featherstone Strategic Employment Site;
 - Facilitate the delivery of a new 2FE Primary School;
 - Allows for the delivery of the long-term aspiration for a rail-based Park and Ride facility at Brinsford;
 - Enhancements to the Green Infrastructure Network including the provision of new publicly accessible open space and measures to ensure achievement of biodiversity net gain.
- 2.13 In addition, the emerging proposal would also deliver the following further infrastructure benefits:
- Provision of a new village hub providing opportunities for retail and community uses;
 - Community allotments to provide benefit to new and existing residents;
 - Provision of pedestrian and cycle paths to link with neighbouring settlements and the proposed strategic employment sites.
- 2.14 The IDP, identifies the correct infrastructure projects to support the proposed spatial development strategy based upon the evidence currently published. Taylor Wimpey recognises that the IDP is a living document and further evidence planned for publication may influence site specific infrastructure requirements.
- 2.15 Taylor Wimpey is committed to engaging with the District Council, and other stakeholders to explore infrastructure requirements to inform future iterations of the Infrastructure Delivery Plan and the emerging proposal for Land at Cross Green.

Question 3a: Have the correct vision and strategic objectives been identified?

- 2.16 The Vision is clear and succinct, however as presently drafted it doesn't appear locally relevant and contains no spatially specific elements.
- 2.17 Taylor Wimpey supports the strategic objectives identified. These are considered succinct, locally relevant and relate to the most important areas of change or protection within the District.

Question 3b: Do you agree that the draft policies and policy directions will deliver these objectives?

- 2.18 Taylor Wimpey considers the draft and emerging policies will assist in delivering these objectives.

3. Development Strategy

3.1 Taylor Wimpey supported Spatial Housing Option G identified through the previous Strategic Housing Strategy and Infrastructure Delivery consultation undertaken in 2019. It is noted the proposed strategy represents a refinement of this option.

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

3.2 In terms of the strategic approach to the Green Belt there is an acceptance within the Local Plan that there needs to be changes to the Green Belt boundary to accommodate growth requirements within the Plan period. It is agreed that Green Belt release is necessary to deliver a sustainable spatial strategy.

3.3 Taylor Wimpey agrees that exceptional circumstances exist for Green Belt release within the District to allow for sustainable development within the plan period.

3.4 The consultation document recognises that the character of South Staffordshire is directly influenced by the fact that around 80% of the District lies within the West Midlands Green Belt. The rural nature of the District also results in a lack of brownfield opportunities to meet any future housing needs beyond the proposed plan period.

3.5 The Site Allocations Document identified a number of safeguarded land sites to meet longer term growth requirements and this Local Plan review should consider a similar approach to ensure Green Belt boundaries endure well beyond the plan period.

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

3.6 Taylor Wimpey generally supports the policy approach set out in Policy DS3 – The Spatial Strategy to 2038, however further commentary is set out below in respect of different elements of the spatial strategy for housing.

Local Housing Need

3.7 The Strategic Housing Market Assessment (SHMA) sets out a minimum housing requirement of 254 dpa based on the Government's standard method. The PPG is clear however that the standard method identifies a minimum annual housing need figure and does not produce a housing requirement figure

recognising there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

3.8 Paragraph 010 of the PPG (ID: 2a-010-20201216) states:

“Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;”*

3.9 Other circumstances that should be considered in respect of South Staffordshire District include the balance between homes and jobs created over the plan period.

3.10 These circumstances are considered in further detail below.

Unmet Need from Neighbouring Authorities

3.11 The unmet housing need arising from within the wider Greater Birmingham and Black Country Housing Market Area is well documented.

3.12 The Birmingham City shortfall was tested through the BDP EiP and an unmet housing need to 2031 of 37,900 homes was confirmed.

3.13 The Black Country LPAs are currently undertaking a review of the Black Country Plan which is aligned to the timescales of the South Staffordshire Local Plan review. Evidence that has informed the emerging Black Country Local Plan includes an urban capacity assessment. The Urban Capacity Review (2019) concludes that the amount of housing need which cannot be accommodated in the Black Country urban areas remains significant, at around 26,920 homes to 2038.

- 3.14 The Draft Black Country Plan 2018-2039, subject to consultation in 2021, identified a shortfall of 28,239 homes to be exported to neighbouring LPAs through the Duty to Co-operate.
- 3.15 The shortfall figures above do not take into consideration the 35% urban uplift introduced in December 2020 which would be applicable to both Birmingham and Wolverhampton.
- 3.16 Taylor Wimpey supports the Council's evidence led approach to providing an additional 4,000 homes to assist with meeting the unmet need. The figure of 4,000 appears reasonable and is justified by shared evidence produced by constituent LPAs within the HMA.

Economic Uplift

- 3.17 The SHMA sets out the broad economic consequences of the projected growth in Chapter 5, highlighting that the working age population will increase by 3,489 people between 2018 and 2038, which represents growth of 5.4%. If the current job density is maintained in 2038 it is anticipated that an extra 1,989 new jobs will be required to support the uplift in the working age population. Jobs growth would need to rise to 2,826 to support an increased job density in line with the wider West Midlands region.
- 3.18 The number of jobs likely to be created within South Staffordshire is likely to significantly exceed the 2,826 required to support the West Midlands regional job density by virtue of committed development at the West Midlands Interchange (WMI) which in itself is projected to create 8,500 jobs of which 40% will be higher skilled and this level of growth would represent 17% of the Stoke-on-Trent and Staffordshire LEP's new jobs target to 2030. In addition, significant jobs growth will be provided through committed strategic employment developments planned at i54 and ROF Featherstone.
- 3.19 At present the SHMA fails to consider whether the minimum local housing need figure derived from the standard method would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth, even taking into consideration the 4,000 additional homes to meet unmet needs in the wider housing market area.
- 3.20 Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand. This may require an uplift in local housing needs identified.

Settlement Hierarchy

- 3.21 Taylor Wimpey supports the settlement hierarchy which considers the relative sustainability of villages within South Staffordshire District. The Tier 1 and Tier 2 settlements identified contain the widest range of services and facilities and by focusing new homes to these settlements would provide an opportunity to increase sustainability and self-containment.
- 3.22 While the Rural Services and Facilities Audit does not consider locations adjacent to other adjacent towns and cities, these locations are recognised as sustainable locations for growth with over 2,500 homes focused to neighbouring towns and cities within the plan period. Land at Cross Green is sustainably located to the north of the conurbation with good links to existing services and facilities and provides an opportunity to support the delivery of a new rail halt and strategic park and ride facility at Brinsford.

Spatial Distribution of Housing Growth

- 3.23 Taylor Wimpey supports the distribution of housing growth through the identification of strategic sites close to the Black Country and proportionate growth focused to the villages, with the most sustainable villages to deliver a higher amount of growth.
- 3.24 Housing growth also appears to be focused to the north of the District which aligns to the location of the Tier 1 settlements and the proposed employment strategy, that seeks to deliver thousands of new jobs in the northern extent of the District, including the freestanding employment site at ROF Featherstone which is adjacent to Land at Cross Green. This part of the District is also far more connected to major road and rail infrastructure.
- 3.25 Taylor Wimpey considers that the proposed development strategy not only assists in providing improved infrastructure but also has due regard to where housing needs exist, including within locations close to the Black Country conurbation where a 28,239 home shortfall in provision has been identified.
- 3.26 This strategy provides the opportunity to ensure that the necessary homes, along with supporting infrastructure, would be delivered in a timely and coordinated manner, to meet both the local needs arising from within the District, alongside those arising from the wider GBBCHMA.

Question 6: Do you support the policy approach in Policy DS4 – Longer Term Growth Aspirations for a New Settlement?

- 3.27 Taylor Wimpey notes Policy DS4, which recognises the Council’s aspiration to explore the potential for a sustainable, independent new settlement.
- 3.28 Policy DS4 recognises that such an option would not contribute to housing growth during the proposed plan period to 2038 which is agreed. A new settlement proposal, even if a suitable and viable option were to be identified, would take a long time to masterplan and deliver and would need to be delivered alongside infrastructure on a scale much larger than a usual development

4. Site Allocations

4.1 Taylor Wimpey has a number of land interests within South Staffordshire District. This representation relates to Land at Cross Green and should be read in conjunction with other representations submitted in respect of the proposed allocations.

Question 7a: Do you support the proposed strategic housing allocations in policies SA1-SA4?

4.2 Taylor Wimpey supports the proposed identification of strategic housing allocations and has a freehold land interest in the strategic housing allocation at Cross Green and further land interests at Land North of Linthouse lane.

4.3 In respect of Land at Cross Green, the proposed strategic housing allocation, provides an opportunity to deliver approximately 1,200 dwellings alongside new infrastructure as identified in Policy SA2. The key infrastructure and design requirements set out in Policy SA1, as drafted, are supported by Taylor Wimpey.

4.4 Taylor Wimpey's land interests extend to the whole proposed Cross Green allocation, with the majority of the site under freehold ownership, providing confidence that a comprehensive and co-ordinated approach to development can be achieved in its delivery.

4.5 In light of the above, Taylor Wimpey does not consider it necessary to require a Land at Cross Green SPD as a vehicle for establishing site requirements and an assessment framework. Policy SA2, as currently drafted, requires the preparation of a masterplan and design code which are both supported by Taylor Wimpey. These documents will be prepared having regard to the requirements established through SA2 and the suite of proposed development management policies. In addition, the preparation of a masterplan and design code will provide opportunity for a collaborative approach including engagement with the local community and key stakeholders. Engagement with key infrastructure providers through the Local Plan review process should result in a robust Infrastructure Delivery Plan (IDP) with the identification of infrastructure requirements, costs and phasing of delivery.

4.6 The preparation of site specific SPDs, as vehicles for setting out further guidance, has the potential to delay delivery of strategic housing allocations, with no guarantees of an adoption date beyond adoption of a new Local Plan. Given the above, it is unclear what additional detail to guide the design and delivery of the allocation would be contained in an SPD.

- 4.7 Taylor Wimpey can demonstrate the site is available, suitable and viable, with further information provided within Chapter 6 of this representation and accompanying Development Vision document.

Question 7b: Do you agreed that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?

- 4.8 Taylor Wimpey recognises the importance of the four proposed strategic housing allocations in delivering the spatial strategy for the District to 2038. Due to the scale of the four sites, Taylor Wimpey supports the inclusion of site-specific policies to establish a vision for each site, alongside a requirement for a detailed masterplan and design code.

- 4.9 The key infrastructure and design requirements are helpful in informing the masterplan and design code.

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

- 4.10 This representation relates to Land at Cross Green. Further comments in respect of the proposed housing allocations contained in Policy SA5 are set out in other representations submitted on behalf of Taylor Wimpey.

5. Development Management Policies

5.1 Taylor Wimpey notes that this consultation document only outlines a general policy approach to non-strategic policies at this stage. Further considered comments can be provided once development policies are fully drafted.

5.2 Therefore, the following comments are intended to provide a helpful steer in drafting the proposed policies.

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

HC1 – Housing Mix

5.3 The policy requires a flexible approach, recognising that the size and type of housing will change over the plan period and may be different across the District.

5.4 Taylor Wimpey considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs. The assessment of needs should be routinely updated across the 20-year Plan period. This ensures that housing mix is reflective of market-driven need.

5.5 Taylor Wimpey would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 75% of properties to comprise three bedrooms or less and a further specific breakdown to be applied on a site-specific basis. This does not provide a good level of flexibility to allow for changing market signals across the plan period or to address varying needs in different locations within the District.

HC2 – Housing Density

5.6 Taylor Wimpey supports the efficient use of land, in accordance with National Planning Policy and Guidance, however, the introduction of a District-wide minimum density standard is not supported. Instead, it is necessary for sites to be considered on a site-by-site basis, having regard to the prevailing housing market conditions, local character, context and other planning policy requirements or environmental designations or constraints.

5.7 In accordance with national guidance the Council may wish to consider a variety of density standards for different locations.

5.8 Nevertheless, due to the size of the site at Land at Cross Green and the lack of identified constraints, it is realistic to expect the delivery of an efficient scheme that could achieve a minimum average net density of 35-40dph. However, this would be achieved through the provision of character areas of varying densities and would be reflective of the character of surrounding development, including higher density development close to centrally located community facilities.

HC3 – Affordable Housing

5.9 Taylor Wimpey notes that for all major developments 30% of all homes are to be delivered as affordable housing. This appears to be broadly supported by the Viability Study which determines the current affordable housing requirement of 40% affordable provision is very unlikely to prove supportable on larger schemes with significant infrastructure costs. The Viability Study confirms that affordable housing within the range of 20-30% is potentially relevant to strategic housing sites overall, assuming a maximum of £9,200/dwelling S106 costs and no additional CIL contribution.

5.10 It is recognised that a Stage 2 Viability Assessment will be undertaken once more refined and bespoke assumptions regarding infrastructure and development costs are known. It is understood that the Infrastructure Delivery Plan will continue to be evolved and refined as the Local Plan review progresses. It will be important for any affordable housing requirement to have regard to the full infrastructure and other policy requirement burdens set out in the plan.

5.11 Taylor Wimpey would welcome the opportunity to engage with the Council and the appointed viability consultants prior to the publication of the Stage 2 Assessment. It should be noted that separate representations have been submitted in respect of the Stage 1 Viability Assessment.

HC4 – Homes for Older People

5.12 The proposed direction of travel requires major residential development to make a clear contribution to meeting the needs of the District's ageing population. It is not clear whether this is a continuation of the Council's current approach of requiring 10% of all homes to be delivered as bungalows or other ground floor accommodation.

5.13 It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 30% of all homes to meet optional M4(2) requirements. M4(2) dwellings 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.”

- 5.14 The Strategic Housing Market Assessment 2021 (SHMA) includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing and technical standards.
- 5.15 The HMA concludes that, in general, South Staffordshire District has an older age structure (in terms of older people) compared with the wider region and nationally. It is recognised that the older person population is likely to increase over the plan period, however an ageing population affects the whole country and is not an issue specific to South Staffordshire. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case.
- 5.16 The SHMA identifies a need for 1,793 accessible and adaptable general homes for those over 65 and 1,235 for those under 65 to 2038. This equates to less than 30% of the planned housing supply to 2038. Taylor Wimpey considers that whilst there may be justification for implementing optional M4(2) standards, the 30% requirement set out is excessive and not justified, especially where this could be in addition to other requirements to be established for bungalow provision.

HC7 – Self & Custom Build Housing

- 5.17 National Planning Policy Guidance notes a responsibility for ‘relevant authorities’ to maintain a self-build and custom housebuilding register. In understanding the need for self and custom build the PPG recognises the role of the Strategic Housing Market Assessment in understanding the size, type and tenure of housing needed for different groups including people wishing to self-build or custom build their own homes.
- 5.18 The SHMA identifies 15 applicants on the self-build register as of December 2019, recognising that 3 of these applicants are also on a register within another LPA. This demonstrates a very low level of demand.
- 5.19 The policy direction does not suggest a specific percentage of self and custom build homes will be required on allocated sites, instead ‘encouraging’ the provision of serviced plots for self-build and custom housebuilding as part of

an appropriate mix of dwellings on all major developments. Taylor Wimpey considers this to be a proportionate response to the evidence that has been published.

- 5.20 If custom and self-build requirements are to be set out in policy, there needs to be a mechanism identified to allow for such plots to come forward for market housing if demand is not present. 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.

HC9 – Design Requirements

- 5.21 Taylor Wimpey supports the introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance.

HC11 – Space about Dwellings & Internal Space Standards

- 5.22 Taylor Wimpey has limited comment in respect of the space about dwellings standards currently utilised by the District Council which are generally considered appropriate.
- 5.23 However, if bungalows are to be provided within a scheme, it would seem logical to reduce garden sizes or allow for the provision of communal/shared gardens to ensure efficient use of land and to reflect any desire from the market for low-maintenance external amenity areas. This approach is also likely to align to any appropriate space about dwellings requirements which should reduce the necessary distance between principal facing windows for ground floor windows, where intervening boundary treatments would interrupt views. At present reduced garden requirements only relate to 1 bed specialist housing rather than single storey general housing in the adopted standards.
- 5.24 Taylor Wimpey would wish to object to the internal floorspace policy direction.
- 5.25 The Nationally Described Space Standards (NDSS) were published by the Department of Communities and Local Government on 27 March 2015. Its publication was accompanied by a Planning Update issued as a Written Ministerial Statement to Parliament by the Rt. Hon. Sir Eric Pickles MP on 25th March 2015.
- 5.26 In introducing the standards, the Written Ministerial Statement outlines:

“New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes.”

- 5.27 However, the Written Ministerial Statement is also clear that the standards are optional, and that compliance cannot be required outside of a relevant current Local Plan policy:

“From 1 October 2015: Existing Local Plan, neighbourhood plan, and supplementary planning document policies relating to water efficiency, access and internal space should be interpreted by reference to the nearest equivalent new national technical standard. Decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy.”

- 5.28 This is to ensure that the need for the application of the standards through planning policy is fully evidenced and that the impact on viability is considered alongside all of the other policies contained in the Plan:

“The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance.”

- 5.29 The reference to the National Planning Policy Framework relates to paragraph 130 which states planning policies should:

“create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.”

- 5.30 Footnote 49 makes it clear that use of the Government’s optional technical standards should be used where this would address an identified need for such properties and the need for an internal space standard can be justified.

- 5.31 National Planning Guidance states:

“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 on 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 transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions."

- 5.32 The Guidance is therefore clear that the application of the NDSS requires a Local Plan policy which has been fully evidenced, including identification of need and the consideration of any impact on viability.
- 5.33 The South Staffordshire Housing Market Assessment provides limited commentary in respect of NDSS. The focus of this commentary, contained within the Accessible and Adaptable Housing section on page 90 relates to M4(2) and M4(3) standards and provides no justification for the requirement of NDSS on all new dwellings. It appears to imply that the NDSS is a national standard that should automatically apply. As set out above, this is incorrect. It also highlights that any requirements should be assessed to determine whether they are viable and should not impose any further requirements beyond building regs.
- 5.34 It is clear evidence does not currently support the imposition of the optional NDSS within South Staffordshire. To the contrary, the evidence highlights a number of potential risks if such a policy were to be introduced. The Council must provide adequate evidence of need if it is to require the application of NDSS in the Local Plan 2018-38.

HC12 - Parking Standards

- 5.35 Taylor Wimpey supports the existing parking standards contained within the adopted Core Strategy.

5.36 In respect of EVCPs, The Department of Transport Consultation Response: Electric Vehicle Charging Points (EVCP) in Residential & Non-Residential Buildings dated November 2021 sets out that from June 2022 new dwellings with associated parking will have at least 1 EVCP per dwelling. Therefore, it is no longer necessary for the Council to have a proposed policy requirement for EVCPs.

5.37 It is also noted that the Council's Viability Assessment includes a cost of only £500 per EVCP. This cost is below the Government's cost estimate and excludes any costs for upgrading local networks. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated a cost of £974 per EVCP plus an automatic levy for upgrading networks capped at £3,600. This should inform the Stage 2 Viability Study.

HC14 – Health Infrastructure

5.38 Taylor Wimpey recognises the need for development to address unacceptable impact on health infrastructure. It is recommended that engagement with the CCG informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

HC15 – Education

5.39 Taylor Wimpey supports the proposed direction of travel in respect of education infrastructure which appears to represent a continuation of the current approach.

5.40 It should be noted the Land at Cross Green is proposing to deliver a new primary school to serve the proposed strategic allocation.

5.41 It is recommended that engagement with SCC Education informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

HC17 – Open Space

5.42 Taylor Wimpey notes the proposed direction of travel in respect of open space which proposes a reduced open space requirement of 0.006ha per dwelling compared to the existing standard of 0.01ha.

5.43 Concern is raised that the emerging requirements appear to provide no flexibility with regards to a site's context. For example, the assumption that all on-site open space should include equipped play provision as a default is

unreasonable where good quality, accessible equipped play is already located within the immediate vicinity of a site. In addition, the requirement for open space to be centrally located may not be appropriate when considering on-site constraints and the location of existing open space in the vicinity.

- 5.44 It is recommended that distance isochrones are identified within the policy for different open space typologies such as LEAPs and LAPs to ensure open space infrastructure has regard to the needs of the wider settlement.

HC18 – Sports Facilities & Playing Pitches

- 5.45 Taylor Wimpey notes the Indoor Sports Facilities Strategy and Playing Pitch Assessment/Strategy that forms part of the evidence base for the emerging Local Plan.

- 5.46 It is recommended that engagement with Sport England and sports clubs/sporting bodies informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

HC19 – Wider Green Infrastructure Design Principles

- 5.47 Taylor Wimpey supports the provision of multi-functional greenspace as part of strategic developments.

EC3 – Inclusive Growth

- 5.48 The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential units is not supported by Taylor Wimpey.

- 5.49 It is not clear how any certainty could be provided through such a Plan. It should be recognised that the business model employed by Taylor Wimpey and other major housebuilders relies upon subcontract businesses.

- 5.50 Despite this construction stage opportunities include:

- Taylor Wimpey can deliver a comprehensive employment, training and skills strategy as part of the construction stage;
- The strategy can include opportunities to engage with schools and colleges; and
- Taylor Wimpey will prioritise the procurement of materials and labour locally where possible.

NB2 – Biodiversity

- 5.51 The intention of Policy NB2 is recognised, however, the Government policy and guidance does not yet require 10% biodiversity net gain. Any policy should require a net gain in line with latest Government legislation, policy or guidance.

NB3 – Cannock Chase SAC

- 5.52 Taylor Wimpey notes further evidence in respect of Cannock Chase SAC, including a review of mitigation measures and visitor survey, is due to be published in 2022. This evidence should inform the policy approach to addressing any impact arising from development on Cannock Chase SAC and determine whether on-site mitigation will be effective in addressing such impact.

NB6 – Energy & Water Efficiency & Renewable Energy

- 5.53 Taylor Wimpey supports the direction of travel in respect of carbon reduction.
- 5.54 Changes to building regulations (Part L) to deliver the Government’s ‘Future Homes Standard’ means that from mid-2022, new homes will have a 31% reduction in CO² when compared to current standards. Further changes are due in 2025 that will mean a 75% reduction in CO² when compared to today, along with a new focus on rating primary energy efficiency as well as CO².
- 5.55 The Council’s proposed policy approach is unnecessary and repetitious of 2021 Part L Interim Uplift. It is the Government’s intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council’s specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council does not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.

Question 12a: It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree that these are strategic policies?

- 5.56 Taylor Wimpey agrees that the policies outlined above represent strategic policies.

Question 12b: Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies?

5.57 Final drafted policy wording would be required to determine whether a policy is strategic.

6. Land at Cross Green

6.1 This Chapter sets out a brief description of Land at Cross Green, followed by an assessment of the site against each of the Council's site selection criteria, as defined within the Housing Site Selection Topic Paper.

6.2 A Development Vision Document has been prepared and is attached at **Appendix 2** to this representation which provides further detail.

Site Description

6.3 Taylor Wimpey has current land interests at Cross Green as shown on the Site Location Plan appended to this representation (see **Appendix 1**). The majority of this land interest is within freehold ownership.

6.4 The site comprises 64 hectares / 159 acres of agricultural land with a number of sub-dividing hedgerows. It is bound by the M54 and to the south, the West Coast Mainline railway line to the east, Stafford Road (the A449) and the Staffordshire and Worcestershire Canal to the west, with low density residential development and farmland to the north.

6.5 Featherstone village and the strategic employment proposal at ROF Featherstone are located to the east of the site, Coven Heath to the west, and Cross Green, Slade Heath and Coven to the north.

6.6 The site is dissected by two roads, the first of these being Dark Lane, a single-track carriageway running diagonally north-west to south-east through the centre of the site. This narrow country lane is enclosed by robust hedgerows, which define pastoral fields, giving the route a sunken feeling.

6.7 Secondly, Brinsford Lane, a two-lane carriageway runs west to east across the southern portion of the site. Along this lane, there are a small number of wayside dwellings, farmsteads and agricultural infrastructure including storage barns, including Brinsford Farm.

6.8 A Development Framework Plan has been prepared by Pegasus and is included within the Development Vision Document included at **Appendix 2** to this representation.

6.9 The Development Framework Plan identifies the following key design principles:

- Provision of approximately 1,200 homes;

- Land to allow for the provision of a 500 space car park to serve the long term aspiration of a new strategic park and ride facility at Brinsford;
- Provision of Road Option 7 to facilitate access to ROF Featherstone strategic employment site;
- Provision of a primary school (capable of expansion to 2FE) and co-located local village hub, centrally located on Road Option 7 and close to the potential strategic park and ride facility;
- Provision of approximately 23.76 hectares of green infrastructure, evenly distributed throughout the site, including provision of a central green corridor, new village commons and greenways;
- Provision of a range of recreational and community facilities including a NEAP, LEAPs, natural play, trim trail and community allotments;
- Provision of SuDS; and
- Provision of pedestrian and cycle paths to link with existing infrastructure.

6.10 The Development Vision Document prepared by Pegasus provides further detail in respect of the site and is included at **Appendix 2** to this representation.

Sustainability Appraisal (SA) Findings

6.11 The Council's Preferred Options Sustainability Appraisal (2021) provides an assessment of sites both pre and post mitigation and provides assessment of reasonable alternatives against the SA Objectives.

6.12 It is noted the SA determines the centre of Site 646a/b is located within Flood Zones 2 and 3. A minor negative has therefore been identified against SA Objective 2 (Climate Change Adaption). However, this area of land is excluded from the proposed Strategic Development Allocation (SA2) and is instead identified as Green Infrastructure, to remain within the Green Belt. A further minor negative has been provided in respect of surface water flooding under this SA Objective. This can be addressed through any drainage strategy for the site.

6.13 The SA determines the release of Green Belt land at Site 646a/b would have very high levels of harm to the purpose of the Green Belt if developed. It should be noted the very high harm only relates to Site 646b. This harm rating is disputed by Taylor Wimpey. The methodology in respect of SA Objective 4 is

also questions where 'urbanisation of the countryside' and 'coalescence' are assessed and scored separately to Green Belt harm, despite these matters being a key consideration within the Green Belt study. This has the potential to disproportionately influence the assessment of sites.

- 6.14 SA Objective 5 (Pollution & Waste) notes that Site 646a/b is located adjacent to the A449 and the west coast mainline. It concludes development of the site could potentially expose some site end users to higher levels of transport associated air and noise pollution. An Air Quality Constraints Assessment has been undertaken by BWB on behalf of Taylor Wimpey which demonstrates the annual mean NO₂, PM₁₀ and PM_{2.5} concentrations across the Site were predicted to be below the relevant air quality objectives and fall into APEC category A in both the current year (2021) and the anticipated opening year (2025). Annual mean pollutant concentrations in 2025 were predicted to be lower than those predicted in 2021 and therefore, based on the current predicted improvements in pollutant concentrations, it is considered that Site 646a/b is suitable for the proposed use with regard to the current relevant air quality objectives. In addition BWB has undertaken noise and vibration surveys; the results of which have informed the preparation of the Development Framework Plan to ensure the development can offer an appropriate acoustic environment for future residential use.
- 6.15 SA Objective 5 also states that Site 646a/b coincides with a minor watercourse. It should be noted that this minor watercourse falls outside of the proposed strategic housing allocation and within a Green Infrastructure designation.
- 6.16 SA Objective 8 (Health & Wellbeing) assesses the site to be wholly/partly outside the target distance to a GP surgery. The Development Framework Plan identifies a Village Hub which provides opportunity for a range of community services and facilities which could include the provision of a GP surgery subject to further discussion with the CCG.
- 6.17 SA Objective 10 (Transport & Accessibility) assesses the site to be outside the target distance to convenience stores and has been given a minor negative impact. Again, due to the nature of the site, convenience retail can be provided as part of the proposed village hub.
- 6.18 SA Objective 12 (Economy) determines the site is located in an area with 'reasonable' sustainable access to employment opportunities. As the site is located within close proximity of the strategic employment at neighbouring ROF Featherstone and there is a cycle link to i54 and Four Ashes strategic employment sites, it is considered sustainable access to employment opportunities is excellent.

- 6.19 It is noted that the assessment of Policy SA2 seeks to address some of the points raised above and that the Sustainability Appraisal will be refined as an iterative process alongside the Local Plan review where new information or evidence is provided.

Sequential Test

- 6.20 The Council's spatial development strategy identifies an infrastructure led approach to growth. Taylor Wimpey agrees that exceptional circumstances can be demonstrated for the release of Green Belt to ensure the sustainable delivery of growth requirements across the District.

Green Belt Harm

- 6.21 The Council's Green Belt Study determines the release of Green Belt land at Site 646b would have 'very high levels of harm' to the purpose of the Green Belt if developed and Site 646a 'high levels of harm'.
- 6.22 Taylor Wimpey has commissioned EDP to undertake a preliminary site-specific Green Belt review of the site. This is contained within the Green Belt Position Paper attached at **Appendix 3**.
- 6.23 This preliminary review concludes the development of the site will impact on the openness of the Green Belt at a local level however, due to the large scale of the designation, this would not significantly undermine the openness of the wider coverage of the West Midlands Green Belt.
- 6.24 As a result of the site specific preliminary Green Belt review, it is possible to define how redevelopment could conserve and enhance the landscape, whilst utilising readily available defensible and durable boundaries around which to redefine the Green Belt. The site has the potential to provide permanent, defensible boundaries to maintain a sense of openness in the wider Green Belt area.
- 6.25 Overall EDP considers that the site could be released for development, without significant harm to the function of the Green Belt north of Wolverhampton, retaining the relative openness and performance of the wider Green Belt within this region of South Staffordshire.
- 6.26 For all of these reasons, it is considered that the site could reasonably be removed from the Green Belt and developed in accordance with an appropriately design site proposal, which is sensitive and responsive to its environment, without harm to the integrity of the Green Belt overall.

Landscape Sensitivity

- 6.27 South Staffordshire District Council's Landscape Study (2019) finds that the site has 'moderate' sensitivity in landscape terms.
- 6.28 Whilst the findings of the Landscape Study are not necessarily disputed by Taylor Wimpey, EDP has been commissioned to prepare a preliminary appraisal in respect of landscape and visual matters. The findings are contained within a Landscape Position Note contained at **Appendix 4**.
- 6.29 Overall, the site is considered to have some visual constraints but is generally relatively well enclosed by existing arterial road corridors, a main railway line, as well as residential development and mature landscape features, which substantially filter and screen views to the wider landscape. Consequently, the site is experienced as largely enclosed and the perception of the site is one which is not of such a sizeable area due to the filtering effect of field hedgerow vegetation.
- 6.30 The following key points on visual amenity were identified:
- The effect of undulating landform, robust hedgerows and mature trees within the site filter and screen the visibility of the site, from within the site. However, there is no public access land, or public access route through the site;
 - There is potential for views of the site from the Staffordshire and Worcestershire Canal to the west of the site;
 - There is scope for views of the site from travelling around the local minor routes, particularly those running through the site, albeit, these routes have a sunken feeling in places (e.g. Dark Lane); and
 - There are existing dwellings adjoining the site or overlooking it from the immediate environment; these are mostly situated to the north-west and centrally along Brinsford Lane.
- 6.31 Furthermore, the gently undulating landform within the site, and its surrounding context, further restricts views into the site's interior, by not providing landform of a sloping nature for open views or from elevated topography.
- 6.32 With regards to the planning advice for the 'Settled Plateau Farmland Slopes' Landscape Character Type, the basic concern for the retention of character is the loss of scale and structure due to the decline and fragmentation of

elements of tree cover, mostly notably hedgerow trees and the loss of hedgerows.

6.33 The Development Framework Plan demonstrates how the site provides opportunity to retain, enhance and integrate field hedgerows and tree components, and create new tree groups and woodland blocks through the which can be appropriately managed for longevity.

6.34 Local topography, off-site and on-site mature trees, hedgerows and woodland are notable features that contribute to the site's containment and can be integrated into the development where they will continue to offer these enhancements to local landscape character and context. As such, clear views towards the site are only really obtainable from a limited number of locations, which, are immediate to the site, or within close range.

6.35 With respect to landscape character, the preliminary landscape appraisal concludes the site has limited features of value, with its topography and field pattern and vegetated field boundaries being its most valuable aspect. Its existing boundary and internal vegetation remain intact, filtering and screening views from the wider area. Furthermore, development of the site provides an opportunity to improve the tree stock of the site and to bring all vegetation into long-term management, creating new green infrastructure within the site.

6.36 Residential receptors within close range of the site are perhaps the most sensitive receptors, though private views are not protected in policy terms. Residential amenity is protected, however, and, as such, the scheme design can be sensitive to these receptors, buffering neighbouring properties with open space or rear gardens and seeking to provide an attractive, high quality development in architectural terms.

Impact on the Historic Environment

6.37 Taylor Wimpey has commissioned EDP to prepare a heritage report, which draws together the available archaeological, historic, topographic and land-use information in order to clarify the heritage significance and archaeological potential of land proposed for development.

6.38 The assessment establishes that there are no designated heritage assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Battlefields, Registered Historic Parks or Conservation Areas) within the site, and heritage assets beyond the site will be unaffected by the proposals and have no bearing on the deliverability of the site.

6.39 Further assessment will be carried out in respect of the Staffordshire and Worcestershire Canal conservation area and to consider archaeological remains that have not currently been identified.

6.40 In summary, the technical work undertaken to date concludes there is no evidence to suggest that the development of this site could not accord with the legislative considerations of the Planning (Listed Buildings and Conservation Areas Act) 1990, the National Planning Policy Framework and the policies contained within the emerging local plan.

Surface Water Flooding

6.41 The site lies within Flood Zone 1 which has the lowest probability of flooding.

6.42 The Green Infrastructure designation that crosses the site includes an unnamed tributary of the River Penk. The published Environment Agency flood maps show surface water flooding (Flood Zones 2 & 3) associated with the tributary although the flood zone extents do not entirely match the geometry of the channel. Therefore, detailed site-specific hydraulic modelling will be undertaken to give a more accurate representation of the floodplain.

6.43 There are a number of minor watercourses on site associated with existing field boundaries and will be considered as part of a site wide drainage network.

6.44 To mitigate against the potential impact of increased surface water run-off, the masterplan will deliver:

- Sustainable drainage features that will include storage basins and swales across the development.
- The opening up of the culverted watercourses to reduce chance of blockages in the future.

Highways

6.45 Foot and cycle facilities within the vicinity of the site are currently limited; however, there is significant scope to improve connectivity as part of the development proposals and a package of enhancements have been identified as part of the adjacent ROF Featherstone application.

6.46 The nearest existing bus services to the site are to the west of the proposed development, accessed from the A449 Stafford Road.

- 6.47 The nearest rail station to the site is Wolverhampton Station located around 7km to the south. The station provides frequent train services to numerous destinations including Stafford, Birmingham, Manchester and London. West Midlands Metro services are also available in Wolverhampton, providing access to/ from the West Midlands conurbation. There is significant scope to improve public transport connectivity as part of the development proposals, which includes the potential for a new parkway station on the adjacent West Coast Mainline which bounds the east of the site.
- 6.48 It is proposed that primary vehicle access to the site be taken from the proposed Road Option 7 to be constructed between the A449 Stafford Road and Cat and Kittens Lane, over the WCML, to facilitate the delivery of the adjacent ROF Featherstone employment application.
- 6.49 Secondary points of vehicle access are proposed onto Brinsford Lane and New Road. Separate pedestrian/ cycle access points are also proposed, which will form part of a pedestrian and cycle priority route through the site.
- 6.50 Internally, the site would include a principal spine road in conjunction with a number of primary and secondary streets.
- 6.51 A Transport Assessment will be completed to assess impacts across the wider network, this will include speed survey work. The Transport Assessment will take account of any local committed development sites and any committed highway improvements. Suitable mitigation will be provided as part of the development proposals including any identified off site highway works and contributions.

Impact on Current Land Use

- 6.52 The site currently comprises several parcels of land utilised for agricultural, mainly pastoral, use. There are no Public Rights of Way (PRoW) that cross the site and there are no publicly accessible open spaces or community uses that would be lost as a result on development.
- 6.53 To the contrary, the proposal would deliver new public open space and community facilities that would benefit new residents and the wider community.

Impact on Natural Environment

- 6.54 There are no statutory designated sites of nature conservation value within or immediately adjacent to the site. However, a desk study and Extended Phase 1 Habitat Survey undertaken by EDP has identified the following valuable ecological features:

- Presence of Cannock Chase SAC 10 km north east of the Site;
- Locally designated areas of semi-natural habitat adjacent to the boundaries of the Site;
- Hedgerows, a water course, areas of potentially species rich grassland and mature trees within the Site; and
- Potential for great crested newts, breeding birds and foraging bats to be present (presence to be confirmed by further survey work).

6.55 However, there are no obvious 'in principle' (significant) ecological constraints that would preclude development, and which cannot be avoided by good design. Moreover, EDP considers that the Site and wider land parcel presents an opportunity to deliver a net gain to local biodiversity and contribute to the objects of the Staffordshire Biodiversity Action Plan as well as ensuring local and national policy compliance.

Impact on Environmental Quality

6.56 The agricultural site is unlikely to have significant issues in relation to contamination, and the surrounding context of the site is not considered to represent significant constraints in relation to air quality and noise.

6.57 Whilst it is accepted that development is unlikely to improve the environmental quality of the site as there are no existing issues of contaminated land, development would not give rise to any further environmental quality issues.

Site-Specific Opportunities

6.58 As set out previously within this representation, the development of the site for residential purposes presents the opportunity to deliver Road Option 7 to provide access to ROF Featherstone strategic employment site and to support the Council in the long-term aspiration to realise a new strategic park and ride facility at Brinsford.

6.59 In addition, the proposal would deliver a significant new green infrastructure and new community facilities, including a new primary school and co-located community hub.

6.60 Green infrastructure proposed could provide Green Belt compensatory measures and deliver a net gain in biodiversity.

6.61 Infrastructure delivery represents a significant benefit of allocating Land at Cross Green, for residential development.

6.62 Provision of 1,200 new homes close to the ROF Featherstone strategic employment site also provides a unique opportunity to provide new homes to support jobs growth locally. It should also be noted that a linear, well-lit path also runs from the western edge of the site along the A449 to the strategic employment sites at i54 and Four Ashes.

Suitability

6.63 The information set out above, read in conjunction with the appended Development Vision Document, demonstrates that Land at Cross Green is a suitable site.

Deliverability

6.64 Taylor Wimpey holds a freehold interest in the majority of land contained within the site. There are agreements in place between landowners and Taylor Wimpey on remaining elements of the site to ensure development of the site can be facilitated.

6.65 Taylor Wimpey intends to undertake further technical work to demonstrate the deliverability of land at Cross Green, however information gathered to date concludes that there are no physical or other constraints likely to render the site undeliverable within the proposed Plan period to 2038. The site is available now.

6.66 The site is deliverable and immediately available and, subject to allocation and removal of an element of the site from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years.

7. Conclusion

- 7.1 This representation is made by Evolve Planning on behalf of Taylor Wimpey to the South Staffordshire Local Plan Review, Preferred Options (Regulation 18) consultation. This representation relates to land at Cross Green, a preferred strategic development location, which Taylor Wimpey is promoting for residential-led development.
- 7.2 Taylor Wimpey supports the Council's proposed spatial development strategy, which includes the proposed strategic allocations at Cross Green and to the north of Linthouse Lane. This strategy represents a refinement of Option G identified through the Strategic Housing Strategy and Infrastructure Delivery consultation published in 2019. Taylor Wimpey considers that this option not only assists in providing improved infrastructure but also has due regard to where housing needs exist, including within the top tier sustainable villages and locations close to the Black Country conurbation. Allowing growth to the north of the Black Country and within the Tier 1 and Tier 2 settlements provides an opportunity to meet locally arising housing needs and offers opportunity to deliver new services, facilities and infrastructure that would assist in addressing local issues and provide community benefit for residents.
- 7.3 This strategy provides the opportunity to ensure that the necessary homes, along with supporting infrastructure, would be delivered in a timely and coordinated manner, to meet both the local needs arising from within the District, alongside evidenced unmet needs arising from the wider GBBCHMA.
- 7.4 Taylor Wimpey has raised a number of concerns in respect of the direction of travel for a number of development management policies and considers it is essential for affordable housing delivery targets to be tested alongside all other policy requirements and infrastructure burdens to ensure that the total cumulative cost of all relevant policies do not undermine the deliverability of the Local Plan.
- 7.5 The information contained within this representation, read in conjunction with the appended Development Vision Document, demonstrates that Land at Cross Green is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 7.6 There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the potential impacts of the development of the site can be mitigated through design and in many cases a positive outcome can be achieved.

7.7 It is therefore submitted that Land at Cross Green represents a sound strategic housing allocation.

APPENDIX 1

Site Location Plan

APPENDIX 2

Development Vision Document

APPENDIX 3

Green Belt Position Note

APPENDIX 4

Landscape Position Note