

SOUTH STAFFORDSHIRE LOCAL PLAN
2018-38
PREFERRED OPTIONS

LAND AT POOL HOUSE ROAD, WOMBOURNE

ON BEHALF OF LOVELL HOMES

LOVELL
HOMES

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

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APPENDIX 1: Site Location Plan



1. Introduction

- 1.1 This representation, submitted on behalf of Lovell Homes, 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 Pool House Road, Wombourne where Lovell Homes 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 Lovell Homes 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 Lovell Homes 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 established 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 previously safeguarded land such as Land at Pool House Road, Wombourne which is included as a proposed housing allocation (Policy SA5).

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 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 Lovell Homes 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 The Infrastructure Delivery Plan (IDP) identifies the correct infrastructure projects to support the proposed spatial development strategy based upon the evidence currently published. Lovell Homes recognises that the IDP is a living document and further evidence planned for publication may influence site specific infrastructure requirements.
- 2.13 Lovell Homes would welcome further discussions with the District Council, Parish Council and service providers to explore infrastructure requirements to inform future iterations of the Infrastructure Delivery Plan and the emerging proposal for Land at Pool House Road.

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

- 2.14 The Vision is clear and succinct, however as presently drafted it doesn't appear locally relevant and contains no spatially specific elements.
- 2.15 Lovell Homes 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?

- 2.16 Lovell Homes considers the draft and emerging policies will assist in delivering these objectives.

3. Development Strategy

3.1 Lovell Homes notes the development strategy represents a refinement to Spatial Housing Option G identified through the previous Strategic Housing Strategy and Infrastructure Delivery consultation undertaken in 2019.

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

3.2 Lovell Homes supports the policy approach in Policy DS1, however consideration does need to be given to the permanence of the Green Belt beyond the current plan period.

3.3 Paragraph 140 of the NPPF states:

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond 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 proposed spatial development strategy for the period to 2038 can demonstrate exceptional circumstances for the release of Green Belt to deliver sustainable growth to 2038 and, in light of the District Green Belt constraints, further Green Belt release will be required beyond 2038 to meet future development requirements, even if such requirements only relate to meeting local housing needs. Safeguarded land should continue to be identified within the Tier 1 and 2 settlements, including Wombourne.

The Site Allocations Document identified a number of safeguarded land sites to meet longer term growth requirements and this Local Plan review should take 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 Lovell Homes 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 including 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% uplift applied to Birmingham introduced in December 2020 which would be applicable to both Birmingham and Wolverhampton.
- 3.16 Lovell Homes supports the Council's 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 considered 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 Lovell Homes 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. Wombourne achieved one of the highest services/facilities rankings of all villages within the District despite it not benefiting from a railway station and Lovell Homes supports the identification of Wombourne as a Tier 2 settlement and a sustainable location for additional housing growth.

Spatial Distribution of Housing Growth

- 3.22 Lovell Homes supports the proportionate distribution of housing growth across the villages, with the most sustainable villages to deliver a higher amount of growth.
- 3.23 Allowing growth in 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.
- 3.24 Lovell Homes considers that the proposed development strategy has due regard to where housing needs exist, including within the top tier sustainable villages and locations close to jobs growth.
- 3.25 This strategy, which focuses growth to top tier settlements provides an 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.

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

- 3.26 Lovell Homes notes Policy DS4, which recognises the Council's aspiration to explore the potential for a sustainable, independent new settlement.

3.27 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 Lovell Homes has a number of land interests within South Staffordshire District. This representation relates to Land at Pool House Road, Wombourne and should be read in conjunction with other representations submitted in respect of other site interests.

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

4.2 Lovell Homes notes the identification of four strategic housing allocations however a housing trajectory should be published as part of the review process to ensure the reliance on the strategic sites does not undermine the timely delivery of housing through a non-stepped trajectory.

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

4.3 This representation relates to Land at Pool House Road which is a proposed allocation for a minimum of 223 dwellings. This is supported as 'sound' by Lovell Homes.

4.4 The proposed allocation relates to three separate parcels of land. Lovell Homes has secured an interest in site 459 (minimum of 97 dwellings) and site 562/415 (minimum of 44 dwellings). The key infrastructure requirements set out in respect of these sites are as follows:

- To provide highway and pedestrian connectivity between site 459 and 285; and
- Any relevant policy requirements including affordable housing, open space, education, health, sports and recreation, energy efficiency, climate change mitigation, flood risk mitigation, highways, sustainable transport, housing mix and green infrastructure, delivered in line with the relevant development plan policy standards.

4.5 It should be noted that highway and pedestrian connectivity between sites 459 and 285 may be difficult to achieve due to third party land ownership between these parcels and topographical constraints. Such connectivity can be provided within the public highway along Pool House Road.

4.6 In addition, Lovell Homes would question whether site 459 would be capable of delivering a minimum of 97 dwellings due to the presence of electricity pylons and associated sway lines. A more realistic assumption would be in the region of 75 to 80 dwellings.

5. Development Management Policies

- 5.1 Lovell Homes 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?

- 5.3 Lovell Homes would wish to raise a general concern that the direction for travel for a number of policies relating to major residential schemes are overly prescriptive and have no regard to the context of a site within a wider settlement or any site-specific constraints and opportunities. For example, the policy directions seek to prescribe a specific District wide density, detailed housing mix requiring at least 75% of proposed dwellings to be three bedrooms or less, and within this mix it is expected that properties will comply with NDSS, 30% will be required to meet M4(2) standard and potentially there will be a need to deliver an additional specific percentage as bungalows. In addition, the POS requirement requires all schemes of 33 dwellings or above to incorporate centrally located public open space where equipped play is provided as default. This prescriptive approach is in danger of stifling innovation, undermining high quality design and resulting in a large number of identikit housing proposals that lack and variety in housing provision or reflect/create local identity.

HC1 – Housing Mix

- 5.4 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.
- 5.5 Lovell Homes 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.
- 5.6 Lovell Homes 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.

- 5.7 The District Council's current application of existing housing mix policies should also be avoided which seeks to condition a specific mix at the outline stage. This gives rise to circumstances on smaller site, where the conditioned mix cannot be mathematically met at the reserved matters stage requiring subsequent amendment to the outline condition. This underlines the inflexibility of the current approach taken by the Council and the need for flexibility within conditions.

HC2 – Housing Density

- 5.8 Lovell Homes 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.

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

- 5.10 Nevertheless, due to the collective size of the three land parcels at Pool House Road and the lack of identified constraints beyond the electricity pylons, it is realistic to expect the delivery of an efficient scheme that could achieve a minimum average net density of 35dph. However, this would be achieved through the provision of areas of varying density and would be reflective of the character of surrounding development.

HC3 – Affordable Housing

- 5.11 Lovell Homes notes that for all major developments 30% of all homes are to be delivered as affordable housing. This appears to be supported by the Viability Study.

- 5.12 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.

- 5.13 Lovell Homes would welcome the opportunity to engage with the Council and the appointed viability consultants prior to the publication of the Stage 2 Assessment.

HC4 – Homes for Older People

- 5.14 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.

- 5.15 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.”

- 5.16 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.

- 5.17 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.

- 5.18 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. Lovell Homes considers that whilst there may be justification for implementing optional M4(2) standards, the 30% requirement set out is not justified, especially where this could be in addition to other requirements set out for bungalow provision.

HC7 – Self & Custom Build Housing

- 5.19 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.
- 5.20 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 low level of demand.
- 5.21 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. Lovell Homes considers this to be a proportionate response to the evidence that has been published.
- 5.22 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

- 5.23 Lovell Homes 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

- 5.24 Lovell Homes has limited comment in respect of the space about dwellings standards currently utilised by the District Council
- 5.25 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.

5.26 Lovell Homes wishes to raise concerns with the internal floorspace policy direction.

5.27 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.

5.28 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."

5.29 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."

5.30 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."

- 5.31 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.”

- 5.32 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.

- 5.33 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.”

- 5.34 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.

- 5.35 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. 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.

- 5.36 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.

HC12 - Parking Standards

- 5.37 Lovell Homes supports the existing parking standards contained within the Core Strategy.
- 5.38 In addition, Lovell Homes supports the requirement to provide electric vehicle charging infrastructure for each dwelling.

HC14 - Health Infrastructure

- 5.39 Lovell Homes recognises the need for development to address any 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

- 5.40 Lovell Homes supports the proposed direction of travel in respect of education infrastructure which appears to represent a continuation of the current approach.
- 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 Lovell Homes 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. Whilst a reduction in the POS requirement compared to that contained within the adopted Site Allocations Document is supported by Lovell Homes, further flexibility should be incorporated within any policy to have regard to existing or proposed publicly accessible open space in the vicinity of the site.
- 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. For example, within the Pool House Road sites, the area constrained by electricity pylons provides an opportunity to provide significant new publicly accessible open space which could include allotment provision.

- 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 Lovell Homes 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 Lovell Homes supports the provision of multi-functional greenspace as part of proposed housing developments.

EC3 – Inclusive Growth

- 5.48 The purpose of preparing an Employment and Skills Plan for all developments of 100 or more residential units is questioned by Lovell Homes.
- 5.49 Lovell Homes does have a commitment for the employment of local sub-contractors with development sites recording whether individuals live within 25 miles of the site. Lovell also put agreements in place with larger sub-contractors to employ apprentices from the local area to support the company's commitments to training.
- 5.50 Lovell Homes supports local employment growth and assists in addressing the construction skills shortage through graduate, apprenticeship and trainee programmes.

NB2 – Biodiversity

5.51 Lovell Homes notes the proposed 10% net biodiversity gain direction of travel.

NB3 – Cannock Chase SAC

5.52 Lovell Homes 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.

5.53 Wombourne lies outside the current Zone of Impact for Cannock Chase SAC.

NB6 – Energy & Water Efficiency & Renewable Energy

5.54 Lovell Homes supports the direction of travel in respect of carbon reduction.

5.55 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.

5.56 Lovell Homes already applies a 'fabric first' approach in their house type design.

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?

5.57 Lovell Homes 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?

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

6. Land at Pool House Road

6.1 This chapter sets out a brief description of the site, 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.

Site Description

6.2 Lovell Homes has current land interests at Pool House Road, Wombourne (sites 459 and 562/415) as shown on the Site Location Plan appended to this representation (see Appendix 1).

6.3 These sites comprise single large fields in agricultural use. Electricity pylons cross the western elements of site 459.

6.4 The sites lie outside the Green Belt and were safeguarded through the 2018 SAD to meet longer-term housing needs. The Housing Site Selection Topic Paper recognises that Wombourne contains existing safeguarded land sites that need to be proactively explored for their potential to assist in meeting the District's proposed housing requirement. The assessment concludes there are no unmitigable constraints to the delivery of these sites.

Sustainability Appraisal (SA) Findings

6.5 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.

6.6 Site 459 was determined to be one of the best performing options for biodiversity and geodiversity and education. Site 562/415 was determined to be one of the best performing sites for climate change adaptation, biodiversity and geodiversity, education and health and wellbeing.

6.7 The sites are considered sustainable.

Sequential Test

6.8 The Council's spatial development strategy identifies an infrastructure led approach to growth. Lovell Homes agrees that additional growth is required in the Tier 2 settlement of Wombourne, beyond the existing levels of safeguarded land and urban capacity to deliver this infrastructure-led approach. This will require the release of further Green Belt land.

Green Belt Harm

6.9 The site assessment recognises sites 459 and 562/415 lie outside the Green Belt.

Landscape Sensitivity

6.10 The landscape impact of Sites 459 and 562/415 was fully considered through the formulation of the Site Allocations Document. The Landscape Sensitivity Study that informed the SAD determined that both sites had a 'low' landscape sensitivity rating.

6.11 It is contended that the proposed allocation at Pool House Road is able to accommodate the proposed residential led development without causing undue harm to the landscape character and visual amenity of the site and surrounding countryside.

Impact on the Historic Environment

6.12 Lovell Homes supports the findings of the HESA which confirms there are no designated assets located on Sites 459 and 562/415. It is agreed that direct and indirect potential harm to the historic environment is low in respect of both sites.

Impact on Flood Risk

6.13 It is noted the site assessment confirms the LLFA's view that both sites are low risk.

Highways (Accessibility to the Site)

6.14 It is noted that SCC Highways are satisfied that access can be satisfactorily achieved, subject to the provision of a footway connection.

Lovell Homes can confirm that a footway connection can be achieved that would connect the land parcels.

Suitability

6.15 The information set out above and contained within the Council's Housing Site Selection Topic Paper, demonstrates that Land at Pool House Road is a suitable site. The suitability of sites 459 and 562/415 was fully considered by an independent inspector through the Site Allocations Document Examination in Public.

Deliverability

6.16 Lovell Homes owns the site and can facilitate the development of the site.

- 6.17 Lovell Homes has undertaken a significant level of technical work to demonstrate the deliverability of land at Pool House Road, which 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.
- 6.18 The site is deliverable and immediately available and subject to the proposed allocation of the safeguarded land, could start to deliver homes within 5 years.

7. Conclusion

- 7.1 This representation is made by Evolve Planning on behalf of Lovell Homes to the South Staffordshire Local Plan Review, Preferred Options (Regulation 18) consultation. This representation relates to Land at Pool House Road, Wombourne, a preferred housing allocation, which Lovell Homes is promoting for residential-led development.
- 7.2 Lovell Homes supports the Council's proposed spatial development strategy, which represents a refinement of Option G identified through the Strategic Housing Strategy. Lovell Homes 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. Allowing growth in 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, including the provision of new community facilities to serve Wombourne.
- 7.3 Further evidence should be provided in respect of the housing requirement to consider whether there is a need for additional housing to support likely jobs growth. In addition, Lovell Homes considers this Local Plan should be identifying further safeguarded land to ensure the Green Belt boundary endures well beyond the end of the plan period.
- 7.4 This spatial distribution of housing growth 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.
- 7.5 The information contained within this representation and evidence prepared by the Council demonstrates that land at Pool House Road is a suitable and deliverable allocation for residential development.
- 7.6 It is therefore submitted that Land at Pool House Road, to include sites 459 and 562/415, represents a sound housing allocation.

APPENDIX 1

Site Location Plan

