

SOUTH STAFFORDSHIRE LOCAL PLAN 2018-39 PUBLICATION PLAN

LAND AT CROSS GREEN

SUBMITTED ON BEHALF OF TAYLOR WIMPEY UK LTD



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1. Introduction

- 1.1 This representation, submitted on behalf of Taylor Wimpey UK Ltd, responds to the Regulation 19 'Publication Plan' 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.
- 1.4 Chapter 3 of these representations provides comment in respect of the proposed spatial development strategy, Chapter 4 provides support for the Strategic Development Location at Cross Green, Chapters 5 – 11 provides Taylor Wimpey's views on the proposed theme based policies and Chapter 12 provides an overview of the proposal and consideration of the Council's site selection 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 2039 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 and preferred allocations and policy directions in November 2021, which identified a proposed 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 Publication Plan identifies proposed site allocations to meet the spatial development strategy, including Land at Cross Green which is included as a proposed Strategic Development Location (Policy SA2).

Evidence Base

- 2.6 The Publication Plan is supported by a broad range of evidence documents to be relied upon by the Council in formulating the Local Plan. Taylor Wimpey supports the identification of the Greater Birmingham HMA Growth Study (2018) and the SHELAA which were absent in the Preferred Options document.
- 2.7 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.
- 2.8 Taylor Wimpey has worked collaboratively with the Council, the City of Wolverhampton Council, other key stakeholders and the Council's masterplanning consultant to progress the Strategic Development Location proposal for Cross Green. This has been informed by the preparation of evidence prepared by Taylor Wimpey to supplement the Council's evidence base, including the preparation of an updated Strategic Transport Assessment attached at **Appendix 2**.

Vision & Objectives

- 2.9 The Vision is clear and succinct, however as presently drafted it doesn't appear locally relevant and contains no spatially specific elements.
- 2.10 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.

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.

Policy DS1: Green Belt

- 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 Publication Plan 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.

Policy DS2: Green Belt Compensatory Improvements

- 3.5 Taylor Wimpey recognises that the Local Plan should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land as required by para 142 of the NPPF.
- 3.6 The strategic allocation at Cross Green identifies on land adjacent to the Strategic Development Location to provide compensatory improvements. Such improvements will include the provision of public access as part of an overall green infrastructure strategy that will also secure improvements to environmental quality of this land.

Policy DS4: Development Needs

- 3.7 Taylor Wimpey generally supports the policy approach set out in Policy DS4 Development Needs however further commentary is set out below in respect of different components of the housing requirement arrived at.

Local Housing Need

3.8 The Strategic Housing Market Assessment (SHMA) 2021 sets out a minimum housing requirement of 254 dpa based on the Government's standard method, utilising the 2018 Affordability Ratios. Taylor Wimpey welcomes the publication of a SHMA update in October 2022 which reconsiders the minimum housing requirement having regard to the latest Affordability Ratios (2021) which results in a minimum net annual requirement of 241 dwellings.

3.9 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.

3.10 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;"*

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

3.12 These circumstances are considered in further detail below.

Unmet Need from Neighbouring Authorities

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

3.14 The Birmingham City shortfall was tested through the BDP EiP and an unmet housing need to 2031 of 37,900 homes was confirmed. Birmingham City Council has now commenced a review of the Birmingham Development Plan, with an Issues and Options consultation recently published. The Issues & Options document recognised that the BDP was unable to identify enough land to meet

all of Birmingham's housing need and there is still a need to work with neighbouring authorities within the Housing Market Area (HMA) to deliver a housing shortfall. Birmingham City Council has identified a shortfall of around 78,415 dwellings following an assessment of potential capacity from all sources. While this figure will be refined through Birmingham's plan making process, the shortfall to 2042 will remain significant.

- 3.15 The Black Country LPAs, were until this Autumn, undertaking a review of the Black Country Plan which is aligned to the timescales of the South Staffordshire Local Plan review. Evidence that 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.
- 3.16 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.
- 3.17 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.
- 3.18 Whilst the Black Country LPAs have now taken a decision to abort the joint plan-making approach to instead progress separate Local Plans, Taylor Wimpey considers the evidence remains valid and the Draft Black Country Plan reflects the latest published position in respect of the housing shortfall arising within the Black County.
- 3.19 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 the Greater Birmingham and Black Country HMA Growth Study which represents shared evidence produced by constituent LPAs within the HMA.

Economic Uplift

- 3.20 The SHMA sets out the broad economic consequences of the projected growth in Chapter 5. This references the Economic Development Needs Assessment 2020-2040 which forecasts an additional 4,824 jobs within the District between 2020 and 2040. This forecast is based upon methodologies of two of three forecasting houses that do not provide the basis to identify significant growth in the transport and storage sector.

- 3.21 The number of jobs likely to be created within South Staffordshire is likely to significantly exceed the 4,824 jobs forecast by virtue of committed development at the West Midlands Interchange (WMI) which will provide significant growth in the transport and storage sector. The WMI 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.
- 3.22 At present the SHMA assumes that the projected growth of the working age population in South Staffordshire will grow by 6,618 people between 2020-2040. Whilst this is in excess of the forecast jobs growth outlined in the EDNA, Taylor Wimpey is concerned that the EDNA fails to realistically consider additional jobs created at WMI. Further consideration should therefore be given to 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.
- 3.23 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.

Policy DS5: The Spatial Strategy to 2039

- 3.24 Taylor Wimpey supports the proposed spatial strategy to 2039 which recognises environmental capacity and seeks to make best use of existing infrastructure whilst recognising opportunities to delivery new infrastructure.

Settlement Hierarchy

- 3.25 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.
- 3.26 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 2,800 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

- 3.27 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.
- 3.28 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 consented at ROF Featherstone which is adjacent to Land at Cross Green and the nearby i54 South Staffordshire. This part of the District is also far more connected to major road and rail infrastructure.
- 3.29 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 significant shortfall in housing provision has been identified.
- 3.30 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.

Policy DS6: Longer Term Growth Aspirations for a New Settlement

- 3.31 Taylor Wimpey notes Policy DS6, which recognises the Council's aspiration to explore the potential for a sustainable, independent new settlement.
- 3.32 Policy DS6 recognises that such an option would not contribute to housing growth during the proposed plan period to 2039 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.
- 4.2 Taylor Wimpey recognises the importance of the four proposed strategic housing allocations in delivering the spatial strategy for the District to 2039. 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.

Policy SA2: Strategic development location: Land at Cross Green

- 4.3 Taylor Wimpey has worked collaboratively with the Council, the City of Wolverhampton City Council, other stakeholders, infrastructure providers and the Council's masterplanning consultants in developing a shared Vision and set of Objectives for the new Cross Green community. This process has been informed by the preparation of a range of site-specific technical documents prepared by Taylor Wimpey and evidence produced by the Council.
- 4.4 Taylor Wimpey supports this Vision, Objectives and the resultant indicative Concept Plan contained within the Publication Plan. This will form the basis of further technical work and the preparation of a comprehensive masterplan and design code to inform a future planning application.
- 4.5 The emerging proposal for Cross Green and a summary of technical work undertaken to date is set out in a Vision Document, attached to this representation at **Appendix 3**.
- 4.6 An updated Strategic Transport Assessment (STA) has also been provided at **Appendix 2** to address the appropriate initial comments to the original STA provided by Taylor Wimpey and included as part of the Council's evidence base.
- 4.7 Taylor Wimpey supports the proposed identification of Strategic Development Location and has a freehold land interest in the site at Cross Green and further land interests at Land North of Linthouse Lane.
- 4.8 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.

- 4.9 The key infrastructure and design requirements set out in Policy SA2 are supported by Taylor Wimpey however, it should be recognised that only land within the control of Taylor Wimpey can be safeguarded to provide opportunity for a future rail-based park and ride.
- 4.10 Taylor Wimpey's land interests relate to the 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.
- 4.11 Taylor Wimpey can demonstrate the site is available, suitable and viable, with further information provided within Chapter 12 of this representation and accompanying Development Vision document.
- 4.12 In light of the required Strategic Masterplanning process progressing it is requested that Policy SA2 refers to the delivery of approximately 1,200 homes rather than specifying this as a minimum requirement. The appropriate number of homes to be delivered and density achieved on site will be considered further through the required masterplanning process outlined within the Local Plan.

Policy MA1: Masterplanning Strategic Sites

- 4.13 Taylor Wimpey supports the Council's masterplanning approach to ensure high quality design. Taylor Wimpey confirms that a comprehensive and deliverable site-wide Strategic Master Plan will be prepared in respect of the Strategic Development Location at Cross Green. This will be prepared in conjunction with the Council and informed through pre-application discussions.
- 4.14 Taylor Wimpey welcomes the removal of the requirement for a Supplementary Planning Document for Linthouse Lane set out in the Preferred Options document. Such a document would be superfluous given the commitment in the Local Plan to develop a Strategic Master Plan and design code for the site as described below in accordance with Policy MA1.
- 4.15 It is the intention of Taylor Wimpey to prepare this site-wide Strategic Master Plan to inform a future planning application, recognising that this Masterplan will be adopted prior to the determination of any planning application.
- 4.16 The Strategic Master Plan 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 refinement of the Infrastructure Delivery Plan (IDP) with the identification of infrastructure requirements, costs and phasing of delivery.

Other Proposed Housing Allocations

- 4.17 This representation relates to Land at Cross Green. Further comments in respect of the proposed housing allocations contained in Policy SA3 and SA5 are set out in other representations submitted on behalf of Taylor Wimpey.

5. Delivering the Right Homes

HC1: Housing Mix

- 5.1 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.
- 5.2 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.
- 5.3 Taylor Wimpey would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 70% of properties to comprise three bedrooms or less.
- 5.4 The SHMA utilises a long-term balancing housing market (LTBHM) model to determine future demand for housing. Taylor Wimpey would question whether this model does actually determine demand rather than need. The demand is often for a larger open market property than a household may need to provide additional flexibility e.g. working from home. Therefore, the approach to capping the percentage of larger homes, particularly open market homes, fails to 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

- 5.5 Taylor Wimpey supports the efficient use of land, in accordance with National Planning Policy and Guidance, and supports the flexibility provided by Policy HC2 to allow sites to be considered on a site-by-site basis, having regard to the prevailing local character, context and other planning policy requirements or opportunities for supporting infrastructure.
- 5.6 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

- 5.7 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

2021 Stage 1 Viability Study which determined the current affordable housing requirement of 40% affordable provision is very unlikely to prove supportable on larger schemes with significant infrastructure costs. The Stage 1 Viability Study confirmed 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.

- 5.8 It is recognised that a Stage 2 Viability Assessment builds upon the Stage 1 findings and includes updated assumptions on development costs and values, including a review of the four strategic sites. For Cross Green the appraisal appears to assume approximately £11,000/dwelling S106 costs and no additional CIL contribution, although this is not clear within the site appraisals. Taylor Wimpey recognises that S106 costs will be subject to change at the planning application stage.
- 5.9 Viability is dynamic and the Council's evidence relates to a snapshot in time. Therefore, Taylor Wimpey supports the mechanism within Policy HC3 to submit a viability assessment at the application stage if it can be demonstrated that circumstances have changed. Such circumstances should include increasing infrastructure costs or changes to house prices or build costs.
- 5.10 The policy refers to further guidance being provided by the Affordable Housing SPD is noted. The SPD is not the appropriate approach for setting new policy and or burdens on delivery, and the Local Plan should provide clarity at the point of adoption as to what is required to be delivered.

HC4: Homes for Older People

- 5.11 The proposed policy requires a range of specialist housing to be delivered on site, both within market and affordable sectors. 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.
- 5.12 It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 100% 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.”

- 5.13 The Strategic Housing Market Assessment 2022 (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.
- 5.14 The SHMA 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. The Government has consulted on raising accessibility standards for new homes but the requirement for all homes to meet M4(2) standards is yet to be mandated. If the Council intends to pursue a policy in respect of M4(2) standards this must be evidenced.
- 5.15 The SHMA published in 2021 identified a need for 1,793 accessible and adaptable general homes for those over 65 and 1,235 for those under 65 to 2038. The latest SHMA (2022) increases this identified need to 2,172 accessible and adoptable general homes for those over 65 and 851 for those under 65 to 2040. It is not clear why these figures have altered so significantly in such a short space of time. However, the need equates to less than 30% of the planned housing supply to 2039. Taylor Wimpey considers that whilst there may be justification for implementing optional M4(2) standards, the 100% requirement is not justified. The Policy should be amended to require a maximum of 30% of all new homes to be delivered to meet the optional M4(2) standards, especially where this could be in addition to other homes for older people and others with special housing requirements required by Policy HC4.

HC8: Self & Custom Build Housing

- 5.16 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.
- 5.17 The 2022 SHMA identifies 30 applicants on the self-build register as of Spring 2022, recognising that 10 of these applicants are also on a register within another LPA. This demonstrates a very low level of demand.
- 5.18 Taylor Wimpey considers Policy HC8 provides a justified and proportionate approach to meeting this specific need, which requires the consideration of the

Council's Self Build Register on major developments but falls short of requiring a specific percentage of provision.

- 5.19 Taylor Wimpey supports the approach that should a proposed custom self-build plot not be sold after 12 months following active marketing, then the developer will be permitted to build out the plan as a standard property type, recognising from experience that many of those who are on the Council's register will not be seeking a plot on a larger housing development.

6. Design & Space Standards

HC10: Design Requirements

- 6.1 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.
- 6.2 It should be noted that the proposal at Cross Green has already been subject to significant discussion with stakeholders and further consultation will be undertaken in line with the provisions of Policy MA1 in the preparation of a strategic masterplan.

HC12: Space About Dwellings & Internal Space

- 6.3 Taylor Wimpey has limited comment in respect of the external space standards that reflect existing policy which are generally considered appropriate.
- 6.4 However, if bungalows are to be provided within a scheme, it would seem logical to relax 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.
- 6.5 Taylor Wimpey does currently adhere to the Nationally Described Space Standards (NDSS) through the design of current housetypes.

HC13: Parking Standards

- 6.6 Taylor Wimpey supports the proposed parking standards contained within the Publication Plan.
- 6.7 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 15th June 2022 new dwellings with associated parking within the boundary of the dwelling) 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.
- 6.8 The EVCP standards set out in Appendix I of the Publication Plan are broadly supported in respect of dwellings where these align to Requirement S1 and Regulation 44D.

6.9 It is 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 is not reflected in the Stage 2 Viability Study.

7. Promoting Successful & Sustainable Communities

HC14: Health Infrastructure

- 7.1 Taylor Wimpey recognises the need for development to address unacceptable impact on health infrastructure. At present the policy is restricted to seeking a proportionate financial contribution where it is demonstrated that existing facilities do not have capacity to accommodate patients.
- 7.2 Taylor Wimpey considers this policy should provide additional flexibility by recognising on-site provision of health infrastructure may represent a more appropriate solution to meeting health needs in some circumstances.

HC15: Education

- 7.3 Taylor Wimpey supports Policy HC15 in respect of education infrastructure which appears to represent a continuation of the current approach.
- 7.4 It should be noted the Land at Cross Green is proposing to deliver a new first/primary school to serve the proposed strategic allocation. This is a requirement set out in Policy SA2. The Development Framework Plan for Cross Green identifies a site of 1.6ha to cater for this new facility which is located within the centre of the site, close to other services and facilities proposed, including a local centre and green infrastructure.
- 7.5 It is recommended that engagement with SCC Education informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process. If a First School is required rather than a Primary School, the size of the site necessary to accommodate the school will be less than the 1.6ha identified in Policy SA2. A definitive trigger for requiring the transfer of the land and for the opening of any associated school is also necessary to inform any site phasing plan.

HC17: Open Space

- 7.6 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 with the existing standard of 0.01ha set out within the adopted Site Allocations Document (SAD).
- 7.7 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.

- 7.8 Taylor Wimpey wishes to raise concerns that distance/accessibility isochrones are not identified within the policy for different open space typologies such as LEAPs and LAPs to ensure open space infrastructure and are presumably left to a future Open Space, Sport and Recreation SPD. Accessibility standards should be established through the Local Plan to provide certainty and not displaced to supplementary guidance which is not intended to establish policy or create further burdens on development.
- 7.9 The Development Framework Plan for Cross Green, introduced at **Appendix 3**, demonstrates the delivery of public open space in excess of the 0.006ha requirement and the provision of a range of formal and informal play provision as part of a network of multi-functional green spaces.

HC18: Sports Facilities & Playing Pitches

- 7.10 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.
- 7.11 Taylor Wimpey recognises that a financial contribution to sports facilities and playing pitches may be necessary from new major development to meet needs arising from the development where evidence recognises there is a shortfall in capacity to meet the generated demand.
- 7.12 The policy allows for a financial contribution to improve existing facilities in lieu of new on-site provision where appropriate.

HC19: Green Infrastructure

- 7.13 Taylor Wimpey supports the policy approach to protecting, maintaining and enhancing where possible a network of interconnected, multi-functional and accessible green and blue spaces
- 7.14 Taylor Wimpey supports the provision of multi-functional greenspace as part of strategic developments.
- 7.15 Again, the Development Framework Plan included at **Appendix 3** demonstrates the delivery of multi-functional, interconnected, accessible green and blue spaces as part of the comprehensive proposal for Cross Green.

8. Building a Strong Local Economy

EC3: Inclusive Growth

- 8.1 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.
- 8.2 It is not clear how any certainty could be provided through the provision of such a Plan. It should be recognised that the business model employed by Taylor Wimpey and other major housebuilders relies upon subcontractor businesses. It is therefore not considered that this policy is not justified and any outcomes unlikely to be effective.
- 8.3 Despite this, construction stage opportunities in respect of Cross Green include:
- a comprehensive employment, training and skills strategy as part of the construction stage;
 - opportunities to engage with schools and colleges; and
 - Prioritisation of the procurement of materials and labour locally where possible.

9. Community Services, Facilities & Infrastructure

EC8: Retail

- 9.1 Taylor Wimpey notes the reference to a small quantity of retail provision being supported within Policy EC8 at Cross Green to support the existing Retail Centres Hierarchy.
- 9.2 It is intended that retail floorspace will be included within a central village hub as part of a mix of commercial and community facilities.
- 9.3 The Policy is not clear whether the net floorspace thresholds identified within Policy EC8 for the provision of impact assessments will apply to the Strategic Development Locations.

EC11: Infrastructure

- 9.4 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.
- 9.5 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 2022 (IDP):
- Delivery of a new 1.5 FE Primary School;
 - Convenience retail provision to meet local needs in addition to other commercial/local employment hub/space and flexible community space;
 - Potential contribution towards primary care or on-site provision;
 - Safeguarded land to facilitate the delivery of the long-term aspiration for a rail-based park and ride facility at Brinsford;
 - Expansion of existing or provision of new bus service and improved walking and cycling facilities;
 - Off-site highways mitigation identified informed by a future Transport Assessment;

- Enhancements to the Green Infrastructure Network including the provision of new publicly accessible open space and measures to ensure achievement of biodiversity net gain; and
- Playing pitch provision or contributions towards off-site improvements.

9.6 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. Engagement with key infrastructure providers through the Local Plan review process has taken place through the masterplanning process which has informed the Infrastructure Delivery Plan (IDP) however further engagement is necessary to provide absolute clarity in respect of infrastructure requirements, costs and phasing of delivery. This will inform the strategic masterplan and any associated design code.

9.7 In line with para 122 of The Community Infrastructure Levy Regulations 2010, any financial contributions sought in respect of infrastructure must be:

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

10. Protecting & Enhancing the Natural Environment

NB2: Biodiversity

- 10.1 Taylor Wimpey is supportive of the need to address net losses to Biodiversity, through the provision of enhancement to deliver an overall net gain. The Council's policy requirement to deliver 10% Biodiversity Net Gain, reflects that of the Environment Act and is not objected to.

NB3: Cannock Chase SAC

- 10.2 Taylor Wimpey notes further evidence in respect of Cannock Chase SAC, including a review of mitigation measures and visitor survey. This evidence has informed the current mitigation measures as Policy NB3 to address any impact arising from development within a 15km radius of Cannock Chase SAC.

11. Climate Change & Sustainable Development

NB6: Sustainable Construction

- 11.1 Taylor Wimpey fully supports a response to the Council's declared Climate Emergency with proactive sustainable measures.
- 11.2 Point 1 of Policy NB6 relates to residential carbon reduction and water efficiency standards. Whilst Taylor Wimpey supports the Government's proposal to achieve 'Zero Carbon Ready' homes by 2025, this will be achieved through application of low carbon heating and hot water technology and highly insulated fabric building elements i.e. walls/floor/roofs which will in turn reduce the energy demand for the home. In addition, it should be recognised that decarbonisation of the electricity grid will only improve the carbon reduction of a proposed development over time.
- 11.3 The Building Regulations (Part L) has been updated in order to deliver the Government's 'Future Homes Standard' which meant from the 15th of June 2022, homes will achieve a 31% reduction in carbon emissions when compared to previous standards. This is a step towards achieving zero carbon ready homes by 2025.
- 11.4 The Council's proposed approach aims to seek carbon reduction standards above those introduced by the Government in June 2022. Taylor Wimpey does not support this approach as there is no evidence to support the departure from the latest changes to the Building Regulations (Part L).
- 11.5 The Sustainable Construction & Renewable Energy Topic Paper refers to clear evidence and recommendations contained within the Staffordshire Climate Change Study 2020 providing a clear and compelling case for the Local Plan Review to set carbon reduction standards for new buildings that go beyond building regulations and the current trajectory for implementing the Government's Future Homes Standard. Cameron Homes does not accept this view.
- 11.6 The Climate Change Study was published prior to introduction of the latest changes to Part L of the Building Regulations and the Study recognised that its recommendations would be affected by the Government's consultations on the Future Homes Standards. The Study also recognised that any standards established would need to be subject to viability assessment.

- 11.7 The 63% reduction in carbon emissions against Building Regulations Part L sought by Policy NB6 does not appear to be justified by any evidence produced by the Council to support the emerging Local Plan.
- 11.8 In addition, the Stage 2 Viability Assessment assumes sustainable design/construction standards equivalent to Building Regulations which represent a 31% CO² reduction, not a more onerous CO² reduction target. The 63% proposed reduction is therefore not justified by the evidence.
- 11.9 Whilst the Government's response to the FHS (2019 Consultation Changes to Part L and F) states that local planning authorities will retain powers to set local energy efficiency standards for new homes, it also states *"as we move to ever higher levels of energy efficiency standards for new homes with the 2021 Part L uplift and Future Homes Standard, it is less likely that local authorities will need to set local energy efficiency standards in order to achieve our shared net zero goal"*. (MHCLG Summary Response to the FHS (2019 Consultation Changes to Part L and F). The Government's proposals set out in both Part 1 of its Future Home Standards Consultation and the 10 points for a green industrial revolution have set a target for homes to be 'zero carbon ready' from 2025 rather than necessarily achieving 'zero carbon' from 2025.
- 11.10 The requirement for each dwelling to demonstrate at least a 10% improvement on the Part L 2021 Target for Fabric Energy Efficiency also lacks flexibility.
- 11.11 Until the Future Home Standard and the supporting SAP software is finalised (Government due to consult 2023) the industry will be unable to confirm its building specification and carbon reduction over Building Regulations 2013 or 2021 baselines until Future Homes Standard becomes legislation in 2025. Therefore, Taylor Wimpey would recommend this policy provides flexibility to allow developers to utilise the most appropriate technology available at the time. The Government's approach *"remains technology-neutral and designers will retain the flexibility they need to use the materials and technologies that suit the circumstances of a site and their business"*. (MHCLG Summary Response to the FHS (2019 Consultation Changes to Part L and F).
- 11.12 In respect of limb b), Taylor Wimpey, where possible, practicable and viable, supports the use of on-site renewable energy generation and/or connection to near site renewable low carbon networks. The wording should be amended to 'additional on-site renewable energy generation should be provided where possible, practicable and viable' to provide necessary flexibility.
- 11.13 In respect of limb c) this exceeds the proposed Government Future Homes Standard and is not justified.

- 11.14 Concern is also raised in respect of the technical detail raised in Policy NB6, point 3 regarding embodied carbon. Taylor Wimpey recognises the importance of reducing embodied carbon within the development process. However, embodied carbon emissions are unregulated in this Country. Current policy and regulation focus solely on operational energy use, as distinct from embodied carbon. There is no nationally approved regulator or national recognised standard, national planning policy or building regulation requirement to assess and report on embodied carbon emissions or whole life cycle carbon assessments.
- 11.15 In respect of implementing a recognised quality regime that ensures the 'as built' performance matches the calculated design performance, there is no nationally agreed and approved monitoring approach that could be utilised to determine this.
- 11.16 To conclude, whilst Taylor Wimpey supports a response to climate change and a the reduction in carbon emissions, the proposed policy is ambiguous and ineffective without the supportive national guidance, regulation, regulator and agreed monitoring approach and does not provide the flexibility to respond to an unknown future Government regulation. The District's departure from the national standards could have damaging impacts on the market without the support of evidence, and should therefore aim to achieve a nationally shared net zero goal.
- 11.17 In order to make this policy sound, Taylor Wimpey recommends that the more onerous requirements proposed are reduced to reflect the 2022 building regulations (Part L) and the Future Homes Standards.

12. Land at Cross Green

- 12.1 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 Papers 2021 and 2022.
- 12.2 A Development Vision Document has been prepared and is attached at **Appendix 3** to this representation which provides further detail.

Site Description

- 12.3 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.
- 12.4 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.
- 12.5 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.
- 12.6 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.
- 12.7 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.
- 12.8 A 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 and close to the potential strategic park and ride facility;
- Provision of approximately 23.79 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, natural play and community allotments;
- Provision of SuDS; and
- Provision of pedestrian and cycle paths to link with existing infrastructure.

12.9 The Development Vision Document prepared by Pegasus provides further detail in respect of the site and is included at **Appendix 3** to this representation.

Sustainability Appraisal (SA) Findings

12.10 The Council's Regulation 19 Sustainability Appraisal (2022) provides an assessment of sites both pre and post mitigation and provides assessment of reasonable alternatives against the SA Objectives.

12.11 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.

12.12 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.

12.13 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.

- 12.14 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.
- 12.15 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 ICB.
- 12.16 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.
- 12.17 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.
- 12.18 It is noted that the assessment of Policy SA2 seeks to address some of the points raised above.

Sequential Test

12.19 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

12.20 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'.

12.21 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 4**.

12.22 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.

12.23 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.

12.24 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.

12.25 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

12.26 South Staffordshire District Council's Landscape Study (2019) finds that the site has 'moderate' sensitivity in landscape terms.

12.27 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 5**.

12.28 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.

12.29 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.

12.30 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.

12.31 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.

12.32 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.

- 12.33 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.
- 12.34 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.
- 12.35 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

- 12.36 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.
- 12.37 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.
- 12.38 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.
- 12.39 In summary, the technical work undertaken to date concludes there a 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

- 12.40 The site lies within Flood Zone 1 which has the lowest probability of flooding.
- 12.41 The Green Infrastructure designation that crosses the site includes an unnamed tributary of the River Penk. The published Environment Agency flood maps shows 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.
- 12.42 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.
- 12.43 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

- 12.44 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.
- 12.45 The nearest existing bus services to the site are to the west of the proposed development, accessed from the A449 Stafford Road.
- 12.46 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.

- 12.47 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 proposal.
- 12.48 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.
- 12.49 Internally, the site would include a principal spine road in conjunction with a number of primary and secondary streets.
- 12.50 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. A Strategic Transport Assessment has been provided and is attached at **Appendix 2**.

Impact on Current Land Use

- 12.51 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.
- 12.52 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

- 12.53 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).

12.54 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

12.55 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.

12.56 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

12.57 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.

12.58 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.

12.59 Green infrastructure proposed could provide Green Belt compensatory measures and assist in providing a net gain in biodiversity.

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

12.61 Provision of approximately 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

12.62 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

12.63 Taylor Wimpey holds a freehold interest in the majority of land contained within the proposed strategic development location.

12.64 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 2039. The site is available now.

12.65 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.

13. Conclusion

- 13.1 This representation is made by Evolve Planning on behalf of Taylor Wimpey to the South Staffordshire Local Plan Review, Publication Plan (Regulation 19) consultation. This representation relates to land at Cross Green, a proposed strategic development location, which Taylor Wimpey is promoting for residential-led development.
- 13.2 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. Allowing growth to the north of the Black Country and within the Tier 1 and Tier 2 settlements provides a sound approach to distributing housing growth.
- 13.3 Taylor Wimpey supports the proposed Local Plan, however specific comments are provided in respect of the housing requirement, a number of development management policies and the Council's consideration of the evidence base in relation to Land at Cross Green.
- 13.4 The information contained within this representation, read in conjunction with the appended Development Vision Document and the updated Strategic Transport Assessment, demonstrates that Land at Cross Green is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 13.5 Taylor Wimpey is committed to progressing a Strategic Master Plan in conjunction with the Council, other stakeholders and the wider community.
- 13.6 It is therefore submitted that Land at Cross Green represents a sound strategic housing allocation.

APPENDIX 1

Site Location Plan

APPENDIX 2

Strategic Transport Assessment

APPENDIX 3

Development Vision Document

APPENDIX 4

Green Belt Position Note

APPENDIX 5

Landscape Position Note



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