

**SOUTH STAFFORDSHIRE LOCAL PLAN 2018–
2039**

PUBLICATION PLAN

**LAND BETWEEN A449 STAFFORD ROAD & SCHOOL LANE,
COVEN**

On behalf of Cameron Homes

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APPENDIX 1: INDICATIVE MASTERPLAN



1. INTRODUCTION

- 1.1. These representations are made by Pegasus Group on behalf of Cameron Homes to the South Staffordshire Council Local Plan Publication Plan. This representation relates to Land East of School Lane, Coven (**Appendix 1**).
- 1.2. This representation responds to the emerging policies and allocation having regard to the national and local planning policy context. The tests of soundness are set out in the National Planning Policy Framework (NPPF) paragraph 35. For a Plan to be sound it must be:
 - **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring authorities 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 across 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 of the Framework and other statements of national planning policy, where relevant.

2. PLANNING POLICY CONTEXT

- 2.1. Cameron Homes supports SSDC's review of the adopted South Staffordshire District Development Plan as required by Policy SAD1 of the Site Allocations Document ('SAD') 2018. This provides the opportunity for the Council to comprehensively review the Vision, Strategic Objectives, development requirements, spatial development strategy and policies shaping detailed development proposals.
- 2.2. The Plan review also provides the opportunity for the Council to not only review its own objectively assessed housing need, but also the role of the District in meeting unmet cross boundary needs from the wider Greater Birmingham and Black Country Housing Market Area ('GBBCHMA').

National Requirements for Plan-Making

- 2.3. The existing Core Strategy for South Staffordshire was adopted in 2012, and as such a holistic review of the Plan is overdue and this also committed to within the Site Allocations Document 2018. This Local Plan Review will therefore ensure that an up-to-date Local Plan for South Staffordshire will be in place to support growth and meet future development needs.
- 2.4. Further, the commitment in the emerging Plan to undertake a review at least once every five years, is in accordance with NPPF para 33, which requires local planning authorities to keep policies in their Local Plans up to date by undertaking such a review.
- 2.5. The Proposed Publication Plan consultation follows previous consultations on the Local Plan 'Preferred Options' review which identified a spatial strategy with the identification of housing and employment delivery, whilst also identifying strategic objectives and priorities through numerous policies, including affordable housing. The current consultation document represents SSDC's final version of the Plan and is in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), having considered representations previously made to the Plan, as well as further evidence.
- 2.6. NPPF para 24 also confirms that local planning authorities '...are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross



administrative boundaries.' In the context of South Staffordshire, strategic matters include housing, employment, infrastructure, and the Green Belt.

- 2.7. Cameron Homes supports SSDC'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 but would like to make some representations on the soundness of some parts of the Plan.

Vision, Strategic Objectives and Priorities

- 2.8. The Publication Plan (Regulation 19) identifies a number of 'Issues and Challenges' surrounding homes and communities, economic prosperity and the natural and built environment. The Document goes on to present a 'Vision' based upon these issues and challenges, and a number of 'Strategic Objectives' by which the Vision can be achieved.
- 2.9. It is noted that the Vision remains broadly the same as that presented in the adopted Core Strategy with regard to the aspirations to protect and enhance the districts rural character, communities, and landscape. It is considered that on this element it remains relevant and is broadly supported however it does not appear particularly locally relevant and does not contain spatially specific elements.



3. DEVELOPMENT STRATEGY

- 3.1. Cameron Homes has previously supported this development strategy, although notes this has been refined through the development of this Local Plan.

Policy DS4: Development Needs

- 3.2. Cameron Homes broadly supports the general policy approach however further comments are set out below regarding different components of the housing requirement as set out in the Plan.

Unmet Need from Neighbouring Authorities

- 3.3. In terms of unmet need from neighbouring authorities, the unmet need arising from the wider Birmingham and Black Country Housing Market Area (GBBCHMA) have been well documented. The GBBCHMA Housing Need and Housing Land Supply Position Statement (July 2020) identified the housing shortfall of the GBBCHMA as 67,160 dwellings. Further, the 'Mind the Gap' Barton Willmore Paper dated March 2021 and 'Falling Short – Taking Stock of Unmet Needs across GBBCHMA' paper by Turley in August 2021, both commissioned by HBF Members concluded that the significant unmet needs in the GBBCHMA exist now and will continue to exist in the future. Most recently, the now revoked Draft Black Country Plan 2018–2039 showed a shortfall of circa 28,000 homes in the Black Country alone. Birmingham City Council have recently identified a potential shortfall of over 78,000 dwellings in their Development Plan review Issues and Options consultation.

- 3.4. It is important to stress that the shortfall figures in the GBBCHMA July 2020 paper did not take into consideration the 35% uplift applied to Birmingham or Wolverhampton that were subsequently introduced.

- 3.5. Cameron Homes supports the Council's approach of providing 4,000 homes to assist with meeting the unmet need.

Economic Uplift

- 3.6. The Economic Development Needs Assessment 2020–2040 (June 2022) (EDNA), prepared by DLP Planning on behalf of South Staffordshire District Council, sought to identify future

employment needs across the South Staffordshire area for the period 2020–2040. The EDNA outlines that the approved WMI has the potential to employ 16,600 both on and off site.

- 3.7. The updated HMA at paragraph 5.10 identifies that the projections profiling the change in population indicate that the working age population in South Staffordshire will grow by 6,618 people between 2020 and 2040. This is notably in excess of the growth of 4,824 jobs indicated by the EDNA. The updated HMA at paragraph 5.13 suggests that the housing requirement of 9,089 homes over the Plan period is sufficient to address the projected economic growth for the District. However, further consideration should be given as to whether the minimum local housing need figure derived from the standard method is sufficient to address the projected economic growth for the District, even taking into account the additional 4,000 homes to meet the unmet need of the HMA. Further evidence should be provided to demonstrate this and an uplift in local housing needs may be required.

Policy DS5: The Spatial Strategy to 2039

- 3.8. Cameron Homes generally supports the proposed spatial strategy which builds on the District's existing infrastructure and environmental capacity whilst recognising opportunities to deliver new infrastructure.
- 3.9. The identification of Coven as a Tier 3 settlement where growth will come forward through appropriate allocation is generally supported. Land between A449 Stafford Road & School Lane (site reference: O82) is identified as an allocation and acknowledged to deliver the Council's preferred strategy. This is supported and the allocation clearly accords with the spatial strategy as set out in this policy.

Policy DS6: Longer Term Growth Aspirations for a New Settlement

- 3.10. Policy DS6 sets out an aspiration for SSDC to deliver a new settlement beyond the plan period. It is noted that such an option would not contribute to housing growth during the proposed plan period to 2039 which is agreed.

Policy SA5: Housing Allocations

- 3.11. This representation relates to Land between A449 Stafford Road & School Lane (site reference: O82) which is a proposed allocation for a minimum of 48 dwellings. This is supported as 'sound' by Cameron Homes. The site is also dealt with in the site proforma in



Appendix C. This is discussed in greater detail at Section Five of this representation. It should be noted that the site was previously designated as safeguarded land in the adopted Site Allocations Document to deliver residential development. This Plan was fully examined and found sound. There is nothing that has materially changed to affect this conclusion and the identification of previously safeguarded land as full allocation represents continuity and good planning practice.

4. DEVELOPMENT MANAGEMENT POLICIES

Policy HC1: Housing Mix

- 4.1. Housing mix should be guided by market signals as reflected in the most up to date assessment needs. Such assessments will need to be updated over the course of the plan period and as such this policy requires flexibility.
- 4.2. The requirement that 70% of properties comprise of 3 bedrooms or less is restrictive and does not afford the flexibility expected by NPPF paragraph 62 in order to meet the need to provide for a range of size, type, and tenure for different groups.
- 4.3. The use of the phrase 'disproportionate' in the penultimate paragraph, when describing the quantum of 4+ bedroom houses, lacks the precision and requires clarification.

Policy HC2: Housing Density

- 4.4. Cameron Homes supports the the addition to the policy (set out below) which recognises that a blanket approach to density is unlikely to be effective stating:

'Where it would help to support the delivery of local services and facilities, sites will be encouraged to exceed this minimum density standard where this could be done in a manner consistent with other development plan policies, particularly those relevant to the character of the surrounding area.'

The net density on a site may go below the minimum density standard set above if to do otherwise would result in significant adverse impacts to the surrounding area's historic environment, settlement pattern or landscape character.'

- 4.5. Cameron Homes supports the efficient use of land, in accordance with National Planning Policy and Guidance and supports the flexibility to allow sites to be considered on a case-by-case basis.

Policy HC3: Affordable Housing

- 4.6. Policy HC3 requires proposal for major residential development to provide 30% of all dwellings as affordable housing. The use of the term 'major residential development' in this context requires a definition to save confusion as to what size of development affordable

housing becomes a requirement, it is presumed to be the same as that within the NPPF Glossary.

- 4.7. The requirement for 30% affordable housing appears to be supported by the Viability Study Stage 2 Report 2022 (VA) which confirms at paragraph 3.2.7 that the proposed affordable housing figure can be appropriate for South Staffordshire, but it does highlight the challenges in delivering such a requirement and the need for higher site values to be achieved to deliver this across the board. Viability is dynamic and can change across the plan period therefore Cameron Homes support the inclusion of a mechanism in Policy HC3 to submit a viability assessment at application stage if it is demonstrated that circumstances have changed.
- 4.8. The frequent reference to further guidance being provided by the Affordable Housing SPD is noted. The SPD should do no more than clarify the Local Plan policy and it is suggested that if the requirements for implementing the policy are known to need explanation now then these should either be included within the Plan now or set out within the explanatory text. The SPD is not the appropriate approach for setting new policy and or burdens on delivery, and the Plan should provide clarity at the point of adoption as to what it requires.

Policy HC4: Homes for Older People

- 4.9. Policy HC4 notes major development should:
- '...clearly contributes to meeting the needs of older and disabled people.'*
- 4.10. The above policy wording does not define 'older people', so it is unclear as to exactly who this Policy is targeting or who would be eligible to occupy such dwellings. It stipulates that all major development should provide bungalows, age restricted single storey accommodation, sheltered/retirement living and extra care housing. The Council do not define what ages will be restricted for single storey development and as such, the policy requires clarification on this matter.
- 4.11. It is further noted that since the preferred options consultation, the plan has moved from expecting 30% all homes to be Building Regulation M4(2) compliant, it now requires 100% of all housing to be M4(2) compliant. This brings with it significant additional issues of affordability, in a context where the access and affordability of housing is an area of wider concern. It is also clear that if 100% M4(2) dwellings is being pursued then the requirement for bungalows is not appropriate.

- 4.12. The Council's Viability Study, Stage 2 (2022) acknowledges that at present Part M of the Building Regulations requires all dwellings to be built to a minimum of M4(1) with further enhanced requirements to M4(2) and M4(3) required through policy, subject to evidence of need as well as viability.
- 4.13. Currently, the requirement for M4(2) properties is optional within Building Regulations and are described as making "reasonable provision for most people to access the dwelling and incorporate features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users". 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 justify adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case.
- 4.14. Furthermore, the HMA identifies a need for 1,793 accessible and adaptable general homes for those over 65 years and 1,235 for those under 65 years, across the Plan Period. This equates to less than 30% of the overall housing requirement to be delivered by this Plan. The updated SHMA 2022 at paragraph 8.14 concludes that it is calculated that adapted housing M4(2) will be required for 3,978 households by 2040 in South Staffordshire. It is therefore not clear how the 100% requirement within the Policy has been arrived at or how this is justified.
- 4.15. Having noted the above, it is also noted that the Council's Viability Study 2022 simply refers to a Government consultation¹ which indicates that M4(2) standards may become mandatory for all new housing.
- 4.16. That consultation was undertaken in 2020 and in July 2022 the Government published their response. This indicates that M4(2) dwellings may indeed become mandatory. This will necessitate a change to Building Regulations and statutory guidance, on which the Government will consult further in due course.
- 4.17. At the present time, the requirement for M4(2) dwellings is not mandatory and if the Council wish to pursue a policy requirement of 100% M4(2) dwellings then this needs to be justified,

¹ www.gov.uk: Raising accessibility standards for new homes: summary of consultation responses and government responses (July 2022)

with reference to both need and cost. The policy as currently drafted is not justified and therefore not sound and should be amended to address this.

Policy HC8: Self-Build and Custom Housing

- 4.18. Policy HC8 requires sites for major residential development to "... have regard to the need on the council's self-build register and make provision of self and custom build plots to reflect this". The policy should be clear that in having regard to the Council's self-build register, it is only part 1 of the register which needs to be considered.
- 4.19. In general this policy provides a suitable approach to self-build and custom housing, requiring the consideration of the Council's self-build register (subject to above clarification) but does not require a specific percentage of provision. This element is supported.

Policy HC10: Design Requirements

- 4.20. The introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance is generally supported.

Policy HC12: Space About Dwellings and Internal Space

- 4.21. The continuity of existing external space and dwellings standards is generally supported although there should be a recognition that certain house types, for example Part M4(2) dwellings, should have smaller, more manageable gardens.
- 4.22. Cameron Homes do however object to the internal floorspace policy requirement for all homes to meet the Nationally Described Space Standards (NDSS). In order to pursue the NDSS requirement, the Council need to provide additional evidence for the Local Plan Examination to demonstrate that the policy is sound. National Planning Guidance Housing: optional technical standards (paragraph O20) clearly state that *"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*
- *Need – evidence should be provided in the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*

- *Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *Timing – there may need to be a reasonable transition period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.’*

4.23. It is clear that the introduction of the NDSS requires a Local Plan policy which has been fully evidenced, justified and viability tested. The South Staffordshire Housing Market Assessment Update 2022 (HMA) refers to the NDSS (paragraph 7.32) only in the context of assessing the need for accessible and adaptable homes. The HMA does not provide any justification or evidence for requiring NDSS in the District.

Policy HC17: Open Space

4.24. Whilst there is no in principle objection to the requirements of the policy or the provision of open space within developments, some clarifications are required in order to ensure that the Policy is sound.

4.25. The policy requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site, for example where there is already high-quality equipped play provision in the locality it would not make sense to duplicate this provision. In addition, it is not appropriate to require open space to be centrally located on all sites as this does not take into consideration differences in development sites opportunities and constraints. It is requested that the Council amend the policy to allow policy a more flexible approach to achieve the right design solution for each site.

4.26. The focus of Green Infrastructure provision should be based on quality rather than quantity or ‘useability’ and the exclusion of small incidental green infrastructure (GI) without a clear recreational purpose from on-site open space provision is not supported. The policy text cites landscape buffers as an example of incidental GI which may be excluded. This is not appropriate as landscape buffers can be of a significant size and clearly contribute towards open space provision on a site. They should therefore be included in these calculations. Planning Practice Guidance acknowledges that *‘Green infrastructure can embrace a range of*

spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals, and other water bodies' (Paragraph 004 – ref ID: 8-004-20190721).

- 4.27. The policy should therefore be revisited and clarified, with clear reference to national guidance ensure that open space and green infrastructure is properly and clearly defined and to recognise the contribution that a range of spaces and uses will bring to a development.

Policy HC18: Sports Facilities and Playing Pitches

- 4.28. Policy HC18 is informed by the playing pitch and sport facilities assessments produced by KKP in 2020 and is broadly supported.
- 4.29. Cameron Homes recognises that a financial contribution to sports facilities and playing pitches may be necessary from new major developments to meet needs arising from the proposed development but this should be fully evidence and compliant with the CIL tests.

Policy EC3: Inclusive Growth

- 4.30. The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential dwellings is not supported. Whilst the benefits of such plans are acknowledged, it is considered more appropriate to implement them on a site-by-site basis, dependent on local circumstances and the labour market and such a requirement can be sourced by condition.
- 4.31. Cameron Homes is a local housebuilder based in southern Staffordshire with a headquarters office within 5km of South Staffordshire District. As such, Cameron Homes already supports local employment growth, assists in addressing the construction skills shortage through graduate, apprenticeship and trainee schemes.

Policy EC11: Infrastructure

- 4.32. Policy EC11 commits SSDC to work with and support infrastructure providers and also offer support for the delivery of infrastructure. This is broadly supported, but any assessment of cumulative impact and mitigation requested must be proportionate and CIL Regulation 122 compliant. The policy should be explicit that this is the case.

Policy NB2: Biodiversity

- 4.33. Cameron Homes acknowledges the aspirations of this policy however the Government policy and guidance does not yet require 10% biodiversity net gain. The policy should reflect the latest national legislation, policy or guidance with respect to biodiversity net gain.

Policy NB6: Sustainable Construction

- 4.34. Given that the Environment Act 2021 has recently been made into law, it needs to be made clear that this policy reflects the Act and its purpose.

- 4.35. Concern is raised with some of the technical detail raised in Policy NB6. Clause 3 regarding embodied carbon, includes the statement:

‘Developers must ensure that a recognised monitoring regime is put in place to allow the assessment of energy use, indoor air quality, and overheating risk for 10% of the proposed dwellings (of the council’s choosing) for the first five years of their occupancy and ensure that the information recovered is provided to the applicable occupiers and the planning authority.’

- 4.36. Whilst Cameron Homes fully appreciate the value of Whole Life–Cycle Carbon assessments and the need for some form of post construction, pre–occupation assessment, there is concern raised about this policy. Firstly, once sold the properties will be owned by the purchasers and their mortgagees. There are issues of data protection and consent surrounding the recording and sharing of energy use, air quality and overheating risk data with a third party, in respect of properties that the developer will not own.

- 4.37. Secondly, a question arises as to the purpose of such widespread collation of such data. It will not be possible to post factum make alterations to the constructed buildings, so what is the benefit or purpose of such a significant amount of data collation? If the purpose is to inform and advise as to future construction methods, then this could be equally achieved by an informed and targeted research exercise by organisations such as the BRE in advising Governments and through amendments to Building Regulations. Extracting, what is in effect lifestyle data, from private individuals, is neither considered desirable nor practical in this regard.

- 4.38. There is no evidence to suggest that the Council have considered or addressed the GDPR implications of this requirement, its effect on 'mortgage-ability', or indeed its effect on sales values. Presumably properties which are wired to share private individual's lifestyle data, would be less attractive in the marketplace, and that would be reflected in reduced sales values. This element of the possible in not practical to be delivered in the form proposed, and is therefore considered unsound, on the grounds of being neither justified nor consistent with national policy for the reasons set out above.
- 4.39. Further, the requirement of the policy for developments to demonstrate a minimum 63% reduction in carbon emissions, with each dwellings achieving at least a 10% improvement on the Building Regulations Part L 2021 Target for Fabric Energy Efficiency, plus post development requirements to achieve as least zero regulated carbon across the scheme is unnecessary. It is repetitious of Part L of the Building Regulations, where the Government set standards for energy efficiency. The Council does not need to set local energy efficiency standards to achieve the shared net zero goal. In addition, the Stage 2 Viability Assessment assumes design/construction standards equivalent to Building Regulations so this more onerous requirement has not been properly considered through the Plan's viability assessment.
- 4.40. Similarly, the water efficient standard of 110 litres per person per day is different to the Building Regulations requirements of 125 litres per person per day and is unjustified. As set out in the NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionated and focussed tightly on support and justifying proposed policies. PPG² states that where there is '*clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day*'. The PPG goes on to state³ that to implement this LPAs must establish a clear need '*based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement*'. In order to be found sound this part of the policy needs further detailed justification.

² Para ID: 56-014-20150327

³ Para ID: 56-015-20150327

5. LAND BETWEEN A449 STAFFORD ROAD & SCHOOL LANE

5.1. This Chapter sets out a brief description of Land between A449 Stafford Road and School Lane (previously referred to as Land East of School Lane), Coven (Site Reference No. 082).

Site Description

5.2. Cameron Homes has current land interests at School Lane (see **Appendix 1**). The site comprises approximately 3ha and is currently comprised of undeveloped land. It is bounded by existing residential development to the south and west, the A4229 to the east and playing fields to the north.

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

5.4. POLICY SA5

Sustainability Appraisal

5.5. The site is assessed within the SA (Volume 2) under site reference 082. The SA produced to support this Regulation 19 Plan provides a summary of the post-mitigation site assessments for allocated sites (see Table 6.5). This assessment is reproduced below:

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

5.6. Cameron Homes broadly supports the scoring within the SA. It is noted that the scoring is particularly favourable when compared against other sites within the SA, thereby justifying the allocation of the site.

5.7. It is also noted that the scoring is broadly consistent with the SA published as part of the Preferred Options (Regulation 18) consultation. The only change is to upgrade the biodiversity and geodiversity from 'uncertain' to 'negligible'. This is supported as the Indicative Masterplan shows a significant amount of Public Open Space (POS) can be accommodated on-site. This could also present opportunities for biodiversity enhancement

Site Selection Topic Paper 2022

- 5.8. The Site Selection Topic Paper 2022 has been updated and published to accompany the consultation of the Publication Plan. In the main body of the report, the Paper confirms that there is an existing planning permission in Coven on a previously allocated site. The School Lane site is identified as safeguarded land in the currently adopted Plan. The Paper confirms that this site is non-Green Belt and has been proactively reviewed to establish its potential to meet the District's housing target. The Council's assessment process revealed no unmitigable constraints to the delivery of the safeguarded land the site was considered suitable for safeguarding through the examination of the Site Allocations Document (2018). The Council have therefore proposed this site for allocation to deliver residential development. Cameron Homes are supportive of this allocation. The assessment process confirms that the site remains suitable to deliver residential development, having previously been considered for this purpose through Examination. The Paper also notes that this allocation will assist in the delivery of the Council's spatial strategy which is agreed with and supported.
- 5.9. The individual site proformas are included at Appendix 3. This has been updated from the Preferred Options Paper to only assess the safeguarded site (2.3ha) rather than the wider area previously assessed (5.47ha).
- 5.10. The first criteria is concerned with conformity with infrastructure-led strategy and opportunities for infrastructure delivery. It confirms that the preferred strategy option does not identify Coven as a location for additional Green Belt release and instead focuses on delivering housing growth through existing commitments, allocations and safeguarded sites. The proposed allocations is consistent with this approach as it was allocated as safeguarded land in the Site Allocations Document (SAD). As part of the SAD process, the site went through examination and was deemed sound by the Inspector.
- 5.11. The Paper notes that the site does not appear to have footway access into the wider area however access may be provided through the adjacent open space. The Indicative Layout (**Appendix 1**) shows how the site could be connected to the existing footpath provision on School Lane which will provide a link to the village centre, including bus stops.
- 5.12. The sequential test refers to Green Belt release. The site is not located in the Green Belt having been removed by a previous Local Plan. Allocations of this site therefore represents a continuation of the plan-led approach to the Green Belt in the District which is consistent with the national policy approach to Green Belt. For this reason the Green Belt Harm and Landscape Sensitivity categories are listed as not applicable to the site.
- 5.13. The topic paper scores the site green for both direct and indirect potential harm to the historic environment and confirms there are no concerns identified. This is supported by Cameron Homes. The topic paper notes that archaeological mitigation measures may be required. This can be secured through the development management process by way of appropriately worded conditions.
- 5.14. The known site constraints listed are the lack of a footway on School Lane, removal of an agricultural field, minerals safeguarding and the well planted boundary along School Lane presenting a barrier to access. The Indicative Masterplan demonstrates how access could be achieved from School Lane. It also shows how the site would connect into the existing footpath provision on School Lane to the south which does connect to the village centre via Brewood Road. In terms of minerals, the site is relatively small for mineral extraction and

located in close proximity to existing residential properties therefore any extraction would likely be unacceptable due to amenity concerns for nearby residents.

- 5.15. The Lead Local Flood Authority have confirmed that the site is at low risk of flooding. The County Highways Authority have confirmed that the site is acceptable in principle. The HA also identify vehicular access off School Lane and the relation of existing play facilities. Any alternative access options will also be discussed with the HA.
- 5.16. In terms of site opportunities, the topic paper notes that the site is regularly shaped and offers good permeability providing the opportunity to achieve high quality design. The site is noted to have strong boundaries to the east, south and west and also notes the opportunity to integrate the site with the existing POS to the north. The Indicative Masterplan reflects these opportunities and illustrates how the site could be developed to achieve a high quality scheme, with on-site POS which links to existing facilities to the north.
- 5.17. The proforma concludes that the safeguarded site could deliver the Council's spatial strategy is allocation. This is supported and justifies the safeguarded site's status as a proposed allocation.

Suitability

- 5.18. As set out above, the site is entirely suitable for the proposed allocation. It should be noted that the site has already been considered for residential use and was removed from the Green Belt through the Site Allocations Document, which was subject to Examination. The safeguarding of the site was found to be sound and this representation demonstrates that the full allocation of this site follows the plan-led approach and will contribute towards delivering the spatial strategy for the District.

Deliverability

- 5.19. Cameron Homes have control of Land between A449 Stafford Road and School Lane. As set out in the preceding section, the site is not subject to any overriding constraints that would preclude development. The site is available now and, as a non-Green Belt site, could come forward immediately to deliver housing and community benefits.



6. CONCLUSION

- 6.1. This representation is made by Pegasus Group on behalf of Cameron Homes to the South Staffordshire Local Plan Review, Publication Plan (Regulation 19) consultation. The representation relates to Land between A449 Stafford Road and School Lane, included as a proposed allocation. The site was a safeguarded site in the currently adopted Site Allocations Document and its proposed allocation represents continuity of the plan-led approach to delivering housing growth in the District.
- 6.2. Cameron Homes are generally supportive of the Council's spatial strategy which apportions growth between the various tiers of settlements in the District. Comments have also been provided to assist in refining the development management policies.
- 6.3. This representation has demonstrated that Land between A449 Stafford Road and School Lane is available, suitable and deliverable. It is therefore submitted that it represents a sound housing allocation.



APPENDIX 1: INDICATIVE MASTERPLAN

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



Coven Masterplan

Sketch Layout SK004



Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE

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