

10 December 2021
Delivered by email

Ed Fox
South Staffordshire Council
Wolverhampton Road
Codsall
Staffordshire
WV8 1PX

Ref: DAVQ3004

Dear Ed

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW: PREFERRED OPTIONS CONSULTATION (DAVID WILSON HOMES)

These representations are made on behalf of David Wilson Homes (DWH) (part of Barratt Developments Plc), in response to the South Staffordshire Local Plan Review (LPR) Preferred Options consultation (November 2021).

DWH is promoting land to the west of Featherstone Lane, Featherstone (the site) (site ref: 396). Our representations to the LPR Spatial Housing Strategy and Infrastructure Delivery Consultation in October 2019 were supported by an updated Vision Framework document which demonstrates the site is a highly sustainable and deliverable opportunity for around 360 market and affordable homes, and public open space.

The site

The site is bound by New Road to the north, East Road to the south, the urban edge of Featherstone to the east, and Brinsford to the west. HMP Oakwood, HMP Featherstone and YOI Featherstone, and the ROF Featherstone employment site are all located beyond Brinsford to the west.

The site benefits from a wide range of local services and facilities within Featherstone. These include the Featherstone Academy Primary School, Featherstone Children's Centre and Nursery School, four convenience stores and a post office, sports facilities, doctor's surgery, community hall, a café, opticians, hair saloon, hotel and restaurant, and a take away.

A bus service runs along New Road immediately to the north of the site and bus stops in close proximity to the site provide regular services to Wolverhampton City Centre and Cannock Town Centre.

We discuss the site further in response to Q7.

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Representations to questions

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

The scope of the evidence base prepared to inform the emerging plan is generally robust and proportionate. However, it is noted that the transport modelling work has yet to be published (expected in 2022). This will be critical to informing the new plan and may require changes to the preferred options consultation plan to reflect its findings.

Notwithstanding the wider, general robustness of the evidence base, there are a number of site specific inconsistencies regarding the evidence base and the conclusions that have been drawn from it, as summarised below:

- As set out in our previous representations, the audit of services undertaken by the Rural Services and Facilities Audit 2019 makes a clear case for Featherstone being identified as a Tier 2 settlement, rather than a Tier 3 settlement, indeed the facilities indeed the settlement offers are equivalent to Tier 2 settlements. To reflect this Featherstone should accommodate a greater level of growth. We set out in response to Q2, Q5 and Q7 why a greater quantum of land for new homes should be allocated (or as a minimum safeguarded) at Featherstone.
- Site 396 to the west of Featherstone Lane, Featherstone site scores ‘major negative’ for landscape and townscape in the most recent Sustainability Appraisal (2021)¹, despite the Landscape Sensitivity Assessment scoring the site’s landscape sensitivity as ‘**Low Moderate**’. As with other sites that score similar in the Landscape Sensitivity Assessment, Site 396 should score **minor negative** for landscape and townscape. As we discuss further in response to Q7, if only the eastern extent of the site adjacent to Featherstone were to be developed this impact would reduce further.
- The site scores ‘major negative’ for education, however no justification is provided for this nor how other similar sites score ‘minor negative’ for the same issue, including land around Featherstone. Indeed the site is within an acceptable walking distance of the Featherstone Academy Primary School. Site 396 should therefore score **minor negative** for education.

In summary, the Council’s evidence base has underplayed the role of Featherstone as a settlement, and over played the constraints associated with Site 396, thereby underplaying the role Featherstone could have in delivering new homes sustainably. As set out in our responses to Q2, Q5 and Q7, Site 396 should be a proposed allocation in the plan, or safeguarded as a minimum.

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

Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?

The Infrastructure Delivery Plan (IDP) (2021) forms an update of the IDP (2019) which DWH previously submitted representations on through their response to the Strategy and Infrastructure Delivery Consultation in October 2019.

¹ Despite being assessed in the SA, site 396 at Featherstone is not listed at Table 4.1 (page 68-75) listing all sites assessed.

Concern remains about the ROF Featherstone access road having an estimated cost of £20m. The IDP indicates this will be funded via public sector funding and developer contribution. In addition there has to be concern regarding the delivery of the infrastructure identified in respect to the Cross Green proposed allocation (draft policy SA2) and the housing itself. Experience has repeatedly shown the delivery of such large allocations suffer from considerable delays.

Any evidence that a business case has been prepared to secure public sector funding for the access road has yet to be made available. The most recent publicly available information on funding for the access road appears to be Staffordshire County Council's letter dated 3 November 2017 (copy enclosed at **Appendix 1**) to South Staffordshire's Site Allocations Document examination. This refers to £1.5m of Growth Deal funding being made available via the Stoke-on-Trent and Staffordshire Local Enterprise Partnership. As such there remains a circa £18.5m gap.

It is unlikely that development of the scale proposed at Cross Green (a minimum of 1,200 new homes) would viably be able to meet this gap in funding, particularly given the other significant infrastructure requirements of that site, including safeguarded land for a potential park and ride railway station, and on site retail, education and community services. So the access road could potentially compromise the deliverability of this proposed allocation.

It may be that a funding case has been made, any evidence for this should be made available as part of the regulation 19 consultation on the submission plan to demonstrate the proposed allocation's deliverability.

Given that ROF Featherstone will provide employment benefits for the settlement of Featherstone the funding gap could be narrowed through contributions from new housing growth around Featherstone.

Furthermore the trigger point for when this access road is delivered could compromise the delivery trajectory for the proposed allocation. The submission plan should provide greater clarity on the trigger points (or even broad timescales) for infrastructure delivery at Cross Green and how this relates to housing delivery at the proposed allocation.

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

Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives?

The objectives rightly reflect the District's need for new homes, as well as the contribution to the unmet needs of the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA), and that new development should be focused in sustainable locations either in or around the District's key villages, or through urban extensions.

However, there is no explanation as to which settlements constitute 'key villages'. Notwithstanding the argument that Featherstone should be identified as a Tier 2 settlement, it has to be presumed that Tier 3 settlements are included within this definition.

In terms of strategic objective 9 it should acknowledge that new development will also maintain and enhance the vitality of South Staffordshire's rural communities, as recognised by NPPF paragraph 79.

Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside? If no, please explain how these policies should be amended?

We have no comment on these policies, which deal with non-strategic residential development on land remaining in the Green Belt and open countryside.

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? If no, please explain how this policy should be amended?

Overall spatial strategy and need

DWH support South Staffordshire’s spatial strategy to 2038 insofar as it seeks to deliver a minimum of 4,881 dwellings for the district’s own needs, plus a contribution of 4,000 dwellings towards meeting the GBBCHMA shortfall. This is appropriate and reasonable given that South Staffordshire has a clear and strong relationship with the GBHMA, with significant proportion of South Staffordshire’s residents commuting to elsewhere within the GBBCHMA (61%² in total).

DWH also endorse the key strand underpinning the spatial strategy that growth is distributed to the District’s most sustainable locations to avoid a disproportionate level of growth in the District’s less sustainable settlements. This reflects the requirements of the NPPF.

Settlement hierarchy

However there is a clear inconsistency in the proposed new settlement hierarchy, particularly with regard to Featherstone. Featherstone has a strong offering of services and facilities which are commensurate with that offered by Tier 2 settlements. Featherstone should be a Tier 2 settlement, which could make a greater contribution to delivering the new homes required within the District.

Cross Green and delivery timescales

In response to Q2 we have already identified concerns regarding the potential delivery of infrastructure required to support the Cross Green (draft policy SA2) and how this could impact any trajectory for housing delivery at the site. This is a matter that will require further evidence. This is likely to result in the site delivering less than 1,200 new homes before 2038. The Council should seriously consider additional allocations to ensure the District’s housing needs are met in full.

Given Featherstone’s range of facilities, commensurate of a Tier 2 settlement, it is well placed to accommodate additional housing allocations to make up any shortfall in the event Cross Green delivers less than 1,200 before 2038 given infrastructure triggers. As set out in response to question 1 above, Site 396 to the west of Featherstone is the most sustainable location for growth at the settlement.

Should it be determined that Cross Green will deliver 1,200 new homes before 2038, then there would still be merit in safeguarding land to the west of Featherstone to provide a ‘fail safe’ option should it become apparent the proposed Cross Green allocation does not deliver as anticipated.

The Vision Framework submitted with our previous representations (and enclosed at **Appendix 2**) shows a potential capacity for Site 396 to the west of Featherstone of circa 360 new homes across the entire site. The site comprises two parcels divided relatively equally by Rabbit Lane. Site 1 to the west, closest to Brinsford has a capacity of circa 210 dwellings, whilst site 2 immediately to the west of Featherstone has a potential capacity of circa 150 dwellings. The Vision Framework therefore presents two different options in terms of scale of potential growth at Featherstone.

Reflecting the scale of growth at other Tier 2 settlements it may be that circa 150 dwellings would be most suitable in terms of the size of Featherstone. Enclosed at **Appendix 3** is a plan demonstrating the area of Site 396 which could be proposed for allocation or safeguarded to the west of Featherstone,

² Staffordshire Rural Economy Evidence Base Final Report (July 2015)

which is controlled by a developer (DWH). The plan identifies a minimum 10m woodland buffer along the western site boundary which could remain in the Green Belt and provide a new defensible boundary.

Plan period

South Staffordshire's needs are based on a plan period of 2018-2038. NPPF paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption. To achieve this the plan would have to be adopted by 31 March 2023. The current schedule for this review is that the plan will be adopted in winter 2023, on this basis the plan would not meet the requirements of NPPF paragraph 22. The plan period should therefore be extended to reflect this.

Question 6: Do you support the policy approach in and Policy DS4 –Longer Term Growth Aspirations for a New Settlement? If no, please explain how this policy should be amended?

DWH has no comment on the approach to a new settlement given it is understood this will address needs in future plan reviews and not meet any need arising in this plan.

Question 7: Do you support the proposed strategic housing allocations in policies SA1-SA4? If no, please explain your reasons for this.

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

We have no in principle objection to the proposed allocation at Cross Green (draft policy SA2), although there remain a number of concerns regarding its delivery, as set out in our responses to Q2 and Q5. In summary:

- There is currently no evidence available as to how the access road, which is estimated to cost just £20m and is a key piece of infrastructure required as part of the proposed allocation, will be funded. This could compromise the viability of the proposed allocation given the other significant infrastructure requirements associated with the proposals, including the safeguarding of land for a new potential park and ride station on the West Coast Mainline.
- There is no evidence regarding the delivery trajectory for Cross Green and how delivery (or not) of the access road, including potential triggers, could impact this.

In order to de-risk the plan, the plan should seek to allocate additional sites nearby (such as the sustainably located Site 396 to the west of Featherstone) which could provide new housing in the area in the event that Cross Green is delayed.

Indeed, Site 396 (which has house builder (DWH) support) is located within a suitable walking distance from a range of services and facilities available within Featherstone, and benefits from existing high frequency bus services which pass the site. As identified in the Vision Framework enclosed at **Appendix 2**, the site could deliver in the order of 360 homes early in the plan period in a highly sustainable location.

It is appreciated that the Council's evidence base, including the IDP, demonstrates there is currently a lack of highway capacity at Featherstone (particularly in regard to the A460). This capacity issue will be resolved through the delivery of the M54 / M6 / M6 Toll link road, the Development Consent Order for which is due to be made in 2022. Completion is anticipated for 2024. This will be well within the current plan period, any policy proposing to allocate or safeguard land to the west of Featherstone might be subject to a policy that it should not come forward until the link road has been delivered.

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

Reflecting our responses to Q2, Q5 and Q7 draft policy SA5 should include Site 396, or that part of it immediately to the west of Featherstone as a proposed allocation, or as a minimum safeguarded land.

Question 11: Do you agree with the proposed policy approaches set out in Chapter 6? If no, then please provide details setting out what changes are needed, referencing the Policy Reference number (e.g HC1 - Housing Mix).

Given that these policies directly relate to the delivery of new homes (particularly HC1 – HC3), in the context of NPPF Paragraph 68 the policies should be able to respond directly to local and up to date evidence such as housing need, which changes over time in line with market demand.

Policies on housing mix and density should not be rigid, rather policies should be able to flexibility adapt and endure throughout the plan period. This will allow sites to come forward and ensure their attractiveness to house builders and home buyers.

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

Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies? If yes, then please provide details including the Policy Reference (e.g HC1 – Housing Mix)

Policies DS1 – DS4 and SA1 – SA7 represent policies which are limited to those necessary to address the strategic priorities of the area providing a starting point for any non-strategic policies that are needed as defined by NPPF paragraph 21.

Summary

DWH welcomes the opportunity to engage with the South Staffordshire Local Plan Review.

Overall DWH broadly support the plan's vision, objectives and spatial strategy, but have identified the following concerns which will require additional evidence to be presented and changes to the plan before it is published for regulation 19 consultation:

- Featherstone should be a Tier 2 settlement based on the facilities and services it offers, which are commensurate with other Tier 2 villages
- There are significant risks to the viability and the delivery of the proposed allocation Cross Green (draft policy SA2).
- Additional areas for housing should therefore be allocated at Featherstone, or at least safeguarded to de-risk the spatial strategy's reliance on Cross Green.
- DWH's site to the west of Featherstone (Site 396) is a sustainable location to accommodate this growth and these representations set out a vision for how this could be achieved, whilst delivering a new defensible Green Belt boundary for the north western edge of Featherstone.

We would welcome the opportunity to discuss the site and these representations with officers further.

Yours sincerely

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