

SOUTH STAFFORDSHIRE LOCAL PLAN 2023-2041 PUBLICATION PLAN

LAND AT BRIDGE FARM, WHEATON ASTON



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APPENDIX 1: Sketch Layout



1. Introduction

- 1.1 This representation, submitted on behalf of Keon Homes, responds to the revised Regulation 19 'Publication Plan' and accompanying published evidence, having regard to the national and local planning policy context. It relates specifically to Land at Bridge Farm, Wheaton Aston (Sites 426b) where Keon Homes has secured land interests. A sketch layout 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 additional land to be allocated at Bridge Farm, Chapters 5 – 11 provides Keon Homes' views on the proposed development management 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 Keon Homes supports South Staffordshire District Council in progressing with a review of the South Staffordshire District Plan as required by Policy SAD1. This provides the opportunity for the Council to comprehensively review the following matters:

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

2.2 The National Planning Policy Framework (NPPF 2023) requires local planning authorities to keep policies in their Local Plans up to date by considering a review at least once every five years.

2.3 Keon Homes supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists with the district to guide growth to 2041 and to ensure that development is genuinely plan-led.

- 2.4 The Preferred Options consultation document followed the identification of the Council's preferred spatial housing strategy in October 2019, which established a proposed settlement hierarchy and an approach to delivering infrastructure-led development in line with settlement hierarchy and larger urban extensions focused to the north of the Black Country conurbation.
- 2.5 This revised Publication Plan identifies proposed site allocations to meet the identified housing requirement, including land within the Tier 3 settlement of Wheaton Aston. The previous Publication Plan identified a proposed site allocation at Bridge Farm, Wheaton Aston (Site 426a). As this Keon Homes site is now fully constructed, it is no longer identified.

Vision & Objectives

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

3. Development Strategy

3.1 Keon Homes supports the spatial development strategy which focuses development to the most sustainable settlements, including a proportionate level of growth to Tier 3 settlements including Wheaton Aston. Wheaton Aston is the most sustainable settlement, not constrained by Green Belt.

Policy DS4: Development Needs

3.2 Keon Homes 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

3.3 The Strategic Housing Market Assessment (SHMA) 2021 set out a minimum housing requirement of 254 dpa based on the Government's standard method, utilising the 2018 Affordability Ratios. Keon Homes welcomes the publication of a SHMA update in 2024 which reconsiders the minimum housing requirement having regard to the latest Affordability Ratios (2022) which results in a minimum net annual requirement of 227 dwellings.

3.4 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.

3.5 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;"*

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

3.7 These circumstances are considered in further detail below.

Unmet Need from Neighbouring Authorities

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

3.9 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.

3.10 The Black Country LPAs, were until Autumn 2022, 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 included an urban capacity assessment. The Urban Capacity Review (2019) concluded that the amount of housing need which cannot be accommodated in the Black Country urban areas remained significant, at around 26,920 homes to 2038.

3.11 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.

3.12 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.

3.13 The Black Country LPAs took a decision to abort the joint plan-making approach to instead progress separate Local Plans.

3.14 The individual Black Country Authorities are now preparing their own Local Plans. Wolverhampton City Council consulted on a Regulation 18 Consultation

Plan (dated February 2024) which identified a potential 11,413 dwellings shortfall. Sandwell Council held a Regulation 18 consultation ending in December 2023 which estimated around a 18,000 dwellings shortfall. Dudley Council also held a Regulation 18 consultation ending in December 2023 which estimated around a shortfall of 1,078 dwellings. It is Walsall Council's intention to proceed under new arrangements of plan making.

- 3.15 Keon Homes supports the Council providing a contribution to assist in meeting these unmet needs, however, raises concerns that this is not evidence based. The capacity-led approach, resulting in a contribution of 640 home contribution to the shortfall, will need to be explored and tested through the Examination in Public with neighbouring LPAs.

Economic Uplift

- 3.16 The SHMA sets out the broad economic consequences of the projected growth in Chapter 5. This references the Economic Development Needs Assessment (EDNA). The EDNA Update 2024 forecasts an additional 5,326 net additional jobs in South Staffordshire over the period 2020-2041. This compares to the 4,824 jobs within the district between 2020 and 2040 identified in the previous EDNA. 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.
- 3.17 The number of jobs to be created within South Staffordshire is likely to significantly exceed the 5,326 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.
- 3.18 At present the SHMA assumes that the projected growth of the working age population in South Staffordshire will grow by just 1,012 people between 2023 and 2041. This is significantly lower than the forecast jobs growth outlined in the EDNA. 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 640 additional homes to meet unmet needs in the wider housing market area.
- 3.19 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 2041

- 3.20 Keon Homes supports the proposed spatial strategy to 2041 which recognises environmental capacity and seeks to make best use of existing infrastructure whilst recognising opportunities to delivery new infrastructure.

Settlement Hierarchy

- 3.21 Keon Homes supports the settlement hierarchy which considers the relative sustainability of villages within South Staffordshire District. The Tier 1 and Tier 2 settlements identified contain the widest range of services and facilities and by focusing new homes to these settlements would provide an opportunity to increase sustainability and self-containment. The settlement hierarchy also recognises that the Tier 3 settlements also provide a sustainable location to accommodate growth, including Wheaton Aston which contains a wide range of services and facilities. Proportionate growth within the Tier 3 settlements would assist in supporting existing and proposed services and facilities and deliver new and improved infrastructure in line with community aspirations.

Spatial Distribution of Housing Growth

- 3.22 Keon Homes supports the proportionate distribution of housing growth across the villages, with the most sustainable villages to deliver a higher amount of growth.
- 3.23 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, which seeks to deliver thousands of new jobs in the northern extent of the district, including the freestanding employment sites at WMI, i54, ROF Featherstone and Four Ashes. The northern extent of the district is also far more connected to major road and rail infrastructure.
- 3.24 Allowing growth in the Tier 1 and Tier 2 settlements provides an opportunity to meet locally arising housing needs and offers opportunity to deliver new services, facilities and infrastructure that would assist in addressing local issues and provide community benefit for residents.
- 3.25 Keon Homes considers that the proposed development strategy has due regard to where housing needs exist, including within the top tier sustainable villages and locations close to jobs growth.
- 3.26 This strategy, which focuses growth to top tier settlements (Tiers 1-3) provides an opportunity to ensure that the necessary homes, along with supporting

infrastructure, would be delivered in a timely and coordinated manner, to meet both the local needs arising from within the district.

3.27 This strategy, which focuses growth to sustainable villages within the district provides an opportunity to ensure that the necessary homes, along with supporting infrastructure, would be delivered in a timely and coordinated manner, to meet both the local needs arising from within the district. Smaller sites in sustainable settlements such as Wheaton Aston, that can make best use of and improve existing infrastructure, would support growth in the early years of the plan period, prior to delivery on the identified strategic housing allocations given the inevitable delays in getting to the delivery stage of those sites. The housing trajectory demonstrates a trend of falling supply to 2028.

4. Site Allocations

4.1 This representation relates to Land at Bridge Farm (Site 426b).

Policies SA1 & SA2

4.2 Keon Homes notes the identification of two strategic housing allocations and the included housing trajectory at Appendix G of the Publication Plan. Keon Homes considers a more detailed housing trajectory should be included to ensure the reliance on these strategic sites does not undermine the timely delivery of housing against a non-stepped trajectory, recognising the assumed reduction in completions to 2028.

Policy SA3: Housing Allocations

4.3 This representation relates to Land at Bridge Farm and whilst Site 426a is now complete, the land to the rear beyond the existing settlement boundary (Site 426b) is available for development.

4.4 To meet locally derived housing need arising in the village within the plan period, there is justification for identifying a further housing allocation to support growth in the non-Green Belt settlement of Wheaton Aston. Site 426b is suitable, available and achievable and should be considered if omission sites are necessary to make the Local Plan sound.

4.5 In addition, Site 426b is considered by Keon Homes to perform well and this is explored further in Chapter 12 to these representations.

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

HC3: Affordable Housing

- 5.6 Keon Homes 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.

- 5.7 Viability is dynamic and the Council's evidence relates to a snapshot in time. Therefore, Keon Homes 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.

HC4: Homes for Older People

- 5.8 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.

- 5.9 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."

- 5.10 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.

- 5.11 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.

- 5.12 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 SHMA (2022) increased 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. The latest SHMA (2024 Update) does not appear to provide an

updated figure. However, the need equates to less than 50% of the planned housing supply to 2041. Keon Homes 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 50% 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

- 5.13 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.
- 5.14 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. No update is offered in the 2024 SHMA.
- 5.15 Keon Homes 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.

6. Design & Space Standards

HC10: Design Requirements

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

HC12: Space About Dwellings & Internal Space

- 6.2 Keon Homes has limited comment in respect of the external space standards that reflect existing policy which are generally considered appropriate.
- 6.3 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.
- 6.4 Keon Homes do however object to the internal floorspace policy requirement for all homes to meet Nationally Described Space Standards (NDSS).
- 6.5 The NDSS were published by the Department of Communities and Local Government on 27 March 2015. Its publication was accompanied by a Planning Update issued as a Written Ministerial Statement to Parliament by the Rt. Hon. Sir Eric Pickles MP on 25th March 2015.
- 6.6 In introducing the standards, the Written Ministerial Statement outlines:

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

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

"From 1 October 2015: Existing Local Plan, neighbourhood plan, and supplementary planning document policies relating to water"

efficiency, access and internal space should be interpreted by reference to the nearest equivalent new national technical standard. Decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy.”

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

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

- 6.9 The reference to the National Planning Policy Framework relates to paragraph 135 which states planning policies should:

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

- 6.10 Footnote 52 makes it clear that use of the Government’s optional technical standards should be used where this would address an identified need for such properties and the need for an internal space standard can be justified.

- 6.11 National Planning Guidance states:

“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.

Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”

- 6.12 The Guidance is therefore clear that the application of the NDSS requires a Local Plan policy which has been fully evidenced, including identification of need and the consideration of any impact on viability.
- 6.13 The SHMA 2021 and 2022 Update provide limited commentary in respect of NDSS. The SHMA 2024 provides no further update. The focus of this commentary, contained within the Accessible and Adaptable Housing section on page 84 of the 2022 Update relates to M4(2) and M4(3) standards and provides no justification for the requirement of NDSS on all new dwellings. It appears to imply that the NDSS is a national standard that should automatically apply. As set out above, this is incorrect. It also highlights that any requirements should be assessed to determine whether they are viable and should not impose any further requirements beyond building regs.
- 6.14 It is clear that the evidence does not currently support the imposition of the optional NDSS within South Staffordshire. To the contrary, the evidence highlights a number of potential risks if such a policy were to be introduced. The Council must provide adequate evidence of need if it is to require the application of NDSS in the Local Plan 2023-41 in addition to the separate M4(2) requirements.

HC13: Parking Standards

- 6.15 Keon Homes supports the proposed parking standards contained within the Publication Plan.
- 6.16 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.

7. Promoting Successful & Sustainable Communities

HC17: Open Space

- 7.1 Keon Homes notes the proposed direction of travel in respect of open space which proposes a reduced open space requirement of 0.006ha per dwelling compared with the existing standard of 0.01ha set out within the adopted Site Allocations Document (SAD).
- 7.2 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. Further flexibility should be incorporated within any policy to have regard to existing or proposed publicly accessible open space in the vicinity of the site.
- 7.3 Keon Homes 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.

HC18: Sports Facilities & Playing Pitches

- 7.4 Keon Homes notes the Indoor Sports Facilities Strategy and Playing Pitch Assessment/Strategy that forms part of the evidence base for the emerging Local Plan.
- 7.5 Keon Homes 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, but this should only apply where evidence recognises there is a shortfall in capacity to meet the generated demand from the development.

HC19: Green Infrastructure

- 7.6 Keon Homes supports the policy approach to protecting, maintaining and enhancing where possible a network of interconnected, multi-functional and accessible green and blue spaces

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 Keon Homes.
- 8.2 It is not clear how any certainty could be provided through the provision of such a Plan. Keon Homes is a local housebuilder based in southern Staffordshire with a headquarters office within 5km of South Staffordshire District. As such, Keon Homes already supports local employment growth, assists in addressing the construction skills shortage through graduate, apprenticeship and trainee programmes and is committed to doing its part to help to resolve the well-documented national housing crisis.

9. Community Services, Facilities & Infrastructure

EC11: Infrastructure

- 9.1 Keon Homes supports the Council's proposed infrastructure led strategy which seeks to focus development towards larger and better-connected settlements and where appropriate deliver new infrastructure benefits alongside new development.
- 9.2 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 The intention of Policy NB2 is recognised, however, a 10% biodiversity net gain is now a statutory requirement. Any policy should require a net gain in line with latest Government legislation, policy or guidance.

B3: Cannock Chase SAC

- 10.2 Keon Homes 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

NB6A: Net Zero New Build & NB6C: Embodied Carbon & Waste

- 11.1 Changes to building regulations (Part L) to deliver the Government's 'Future Homes Standard' means that from mid-2022, new homes will have a 31% reduction in CO² when compared to previous standards. Further changes are due in 2025 that will mean a 75% reduction in CO² when compared to today, along with a new focus on rating primary energy efficiency as well as CO².
- 11.2 It is noted that proposed Policy NB6 has been amended since the Publication Local Plan in 2022. These changes are proposed to deal with the Written Ministerial Statement (WMS) made by the Minister of State for Housing and Communities in December 2023.
- 11.3 The Bioregional report published by the Council recognises the WMS places severe new limitations on the ability of LPAs to establish local energy and carbon performance targets. The WMS recognises the balance between moving towards the net zero goal and ensuring housing is built in sufficient numbers to support need.
- 11.4 Keon Homes supports a national approach to carbon reduction set out in the WMS recognising the proliferation of multiple, local standards by local authority area adds further costs to building new homes by adding complexity and undermining economies of scale.
- 11.5 The WMS states that any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they do not have a well-reasoned and robustly costed rationale.
- 11.6 Cameron Homes considers Policy NB6, as currently drafted, to be overly complex, adding a non-standard level of assessment that sits outside that required by building regulations. There appears to be no locally specific evidence to suggest a deviation from the national approach, with the only rationale being linked to precedents in other parts of the Country, where plans were introduced prior to the WMS and, in some cases, the Future Homes Standard.
- 11.7 The Council's proposed policy approach seeks carbon reduction measures over and above those being introduced by the Government. The Sustainable Construction & Renewable Energy Topic Paper 2022 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.

- 11.8 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.
- 11.9 The Council's Viability Study fails to take into the account the additional burden placed on development as a result of policies NB6A and NB6C. These costs are set out in the Bioregional report, published in 2024, after the publication of the Viability Study in 2022
- 11.10 A locally specific CO² reduction requirement is unnecessary and without justification for deviation from Government the requirement is adding unwarranted additional burdens beyond those established through current and planned building regulations. It is the Government's clear intention to set standards for energy efficiency through the building regulations. The key to success nationally is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council does not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes set out in current Building Regulations and proposals for the 2025 Future Homes Standard. The additional policy burdens have not been considered through the whole plan Viability Study.
- 11.11 These policies are fundamentally unsound and should be removed.

12. Land at Bridge Farm

- 12.1 This chapter sets out a brief description of the site, followed by an assessment of the site, including against each of the Council's site selection criteria, as defined within the Housing Site Selection Topic Papers published in 2021 and 2022.

Site Description

- 12.2 Keon Homes has current land interests on land at Bridge Farm (426b) as shown on the Sketch Layout appended to this representation (see **Appendix 1**).
- 12.3 Site 426b adjoins the recently constructed Keon Homes site to the rear and comprises a single field in agricultural use. There are no Public Rights of Way (PRoW) that cross the site and remains free of unmitigable constraints. The site can be access via Site 426a.
- 12.4 A sketch layout has been prepared Keon Homes and is included at **Appendix 1** to this representation. This demonstrates how a comprehensive proposal can be delivered to encompass the remainder of Site 426 and deliver a second phase of development beyond the proposed allocation (426a).

Sustainability Appraisal (SA) Findings

- 12.5 The Council's Sustainability Appraisal (2024) provides an assessment of sites both pre and post mitigation and provides assessment of reasonable alternatives against the SA Objectives.
- 12.6 The Sustainable Appraisal determined that development of Site 426b would result in a double negative against the landscape and townscape objective however it highlights that the site has a similar landscape sensitivity to the majority of land in this broad location. The sketch layout attached at **Appendix 1** demonstrates that built development would be well related to the existing built-up area of Wheaton Aston, including homes currently being constructed on the proposed housing allocation.
- 12.7 All site options that adjoin the Wheaton Aston development boundary to the north, east and west of the village are located within areas determined within the Landscape Study as being of 'moderate-high' landscape sensitivity.

Sequential Test

- 12.8 The Council's spatial development strategy identifies an infrastructure led approach to growth. Keon Homes agrees that additional growth can be

supported in the Tier 3 settlement of Wheaton Aston, beyond the existing development boundary and within the open countryside. Development at Wheaton Aston will not require the release of further Green Belt land.

Landscape Sensitivity

- 12.9 It is noted that South Staffordshire District Council's Landscape Study (2019) concludes that Site 426b has a 'moderate-high' sensitivity in landscape terms. This is reflected within the Housing Site Selection Topic Paper assessment of the site which determines it has a similar landscape sensitivity to the majority of land around the village. All site options that adjoin the existing built-up area of Wheaton Aston to the north, east and west fall within a landscape area (SL79 & SL80) that the Landscape Study determines has a 'moderate-high' landscape sensitivity.
- 12.10 It should be noted the Landscape Assessment undertaken to inform the Site Allocations Document identified the landscape sensitivity as 'low,' with land to the south of the settlement 'medium' and land to the west 'high.' This Landscape Assessment noted the arable and pastoral farmland is of particularly high quality to the west.
- 12.11 It is contended that the further built development beyond the existing development boundary (Site 426b) could be delivered without causing undue harm to the landscape character and visual amenity of the site and surrounding countryside.

Impact on the Historic Environment

- 12.12 Keon Homes supports the findings of the HESA which confirms there would be low direct or indirect harm to the historic environment as a result of development on Site 426b.

Impact on Flood Risk

- 12.13 Keon Homes notes the comments from the LLFA which recommends a Flood Risk Assessment accompanies any potential planning application to investigate 'possible' watercourse.
- 12.14 It should be recognised that development would remain outside of the floodplain as demonstrated on the sketch layout attached at **Appendix 1**.

Highways (Access)

12.15 Keon Homes notes the comments from SCC Highways which confirms no objection to the principle of access, subject to adequate visibility splays. The previous planning application for Site 426a details the proposed access with adequate visibility splays. This constructed access would serve Site 426b to the rear.

Suitability

12.16 The information set out above, read in conjunction with the appended sketch layout demonstrates that the site, both within and outside the existing development boundary, is suitable.

Deliverability

12.17 There is an agreement in place between the landowner and Keon Homes to facilitate the development of the site.

12.18 Keon Homes has undertaken a significant level of technical work to demonstrate the deliverability of Land at Bridge Farm, which concludes that there are no physical or other constraints likely to render the site undeliverable within the proposed Plan period to 2041. The site is available now.

12.19 Site 426b is immediately available and could start to deliver homes well within 5 years as a second phase to Site 426a.

13. Conclusion

- 13.1 This representation is made by Evolve Planning on behalf of Keon Homes to the South Staffordshire revised Publication Local Plan (Regulation 19) consultation. This representation relates to Land at Bridge Farm (Site 426b); which represents a further phase to the recently constructed Keon Homes development (Site 426a).
- 13.2 Keon Homes supports the Council's proposed spatial development strategy, which focuses growth to the top tier settlements including the Tier 3 village of Wheaton Aston. This provides a sound approach to distributing housing growth.
- 13.3 Keon Homes considers that a number of development management policies are not justified by evidence. This includes Policies HC1, HC4, HC12, HC17, EC3, NB6A and NB6C.
- 13.4 Site 426b is suitable, available and achievable and should be considered if omission sites are considered necessary through the EiP process to make the Local Plan sound.
- 13.5 The information contained within this representation, read in conjunction with the appended Sketch Layout, demonstrates that Land at Bridge Farm is a suitable and deliverable site for residential development.
- 13.6 It is therefore submitted that further land at Bridge Farm, beyond the recently constructed site, would also represent a sound housing allocation.

APPENDIX 1

Sketch Layout

RN

NO DWELLINGS WITHIN 20M CANAL BUFFER ZONE

SHROPSHIRE UNION CANAL

ELECTRIC CABLES TO BE DIVERTED THROUGH SITE

FARM ACCESS

APPROXIMATE FLOOD ZONE 3 CONTOUR

PROPOSED SECTION 104 EASEMENT

ATTENUATION POND

P.O.S.

GAS MAIN EASEMENT

EXISTING GAS MAIN EASEMENT (TO BE DIVERTED THROUGH PHASE 2)

NO DEVELOPMENT WITHIN APPROXIMATE LINE OF FLOOD ZONE 3 CONTOUR

LONG STREET

THE HARTLEY ARMS

PHASE 1

SCHEDULE OF HOUSE TYPES

AFFORDABLE		
A	1 BED MAISONETTE	2 No
B	1 BED BUNGALOW	1 No
C	2 BED HOUSE	8 No
D	3 BED HOUSE	2 No
TOTAL		13 No
PRIVATE		
E	1 BED BUNGALOW	2 No
F	2 BED BUNGALOW	1 No
G	2 BED HOUSE	9 No
H	3 BED HOUSE	4 No
I	3 BED HOUSE	2 No
J	3 BED HOUSE	6 No
K	4 BED HOUSE	2 No
L	4 BED HOUSE	2 No
M	4 BED HOUSE	2 No
TOTAL		30 No
GRAND TOTAL		43 No

SKETCH LAYOUT

PHASE 2, BRIDGE FARM, WHEATON ASTON.

KH
KEON HOMES





EVOLVE
PLANNING + DESIGN