

SOUTH STAFFORDSHIRE LOCAL PLAN 2023-41 PUBLICATION PLAN

LAND EAST OF BILBROOK



BLOOR HOMES[®]

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1. Introduction

- 1.1 This representation, submitted on behalf of Bloor Homes Ltd, responds to the current Regulation 19 'Publication Plan' consultation document and accompanying published evidence, having regard to the national and local planning policy context. It relates specifically to Land East of Bilbrook SDL where Bloor Homes has secured land interests. A site location plan is attached at Appendix 1.
- 1.2 Bloor Homes also has further land interests adjoining the proposed SDL. This additional land is subject to a separate representation.
- 1.3 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.
- 1.4 These representations also give consideration to the legal and procedural requirements associated with the plan-making process.
- 1.5 Chapter 3 of these representations provides comment in respect of the proposed spatial development strategy, Chapter 4 provides support for the Strategic Development Location on land east of Bilbrook, Chapters 5 – 11 provides Bloor 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 Bloor 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 Bloor 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 and preferred allocations and policy directions in November 2021, which identified a proposed approach to delivering infrastructure-led development in line with settlement hierarchy and larger urban extensions focused to the north of the Black Country conurbation.
- 2.5 This revised Publication Plan identifies proposed site allocations to meet the identified housing requirement, including Land East of Bilbrook which is included as a proposed Strategic Development Location (Policy SA1).

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 Bloor 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 Bloor Homes supported Spatial Housing Option G identified through the previous Strategic Housing Strategy and Infrastructure Delivery consultation undertaken in 2019 and the strategy set out in the previous Publication Local Plan in 2022. It is noted the updated spatial development strategy represents a refinement of Spatial Housing Option C which is more aligned to the current approach in the adopted Core Strategy.

Policy DS1: Green Belt

3.2 In terms of the strategic approach to the Green Belt there is an acknowledgement within the Local Plan that there needs to be changes to the Green Belt boundary to accommodate growth requirements within the Plan period. It is agreed that Green Belt release is necessary to deliver a sustainable spatial strategy.

3.3 Bloor Homes agrees that exceptional circumstances exist for Green Belt release within the district to allow for sustainable development within the plan period.

3.4 The Publication Plan recognises that the character of South Staffordshire is directly influenced by the fact that around 80% of the district lies within the West Midlands Green Belt. The rural nature of the district also results in a lack of brownfield opportunities to meet any future housing needs beyond the proposed plan period.

Policy DS2: Green Belt Compensatory Improvements

3.5 Bloor Homes recognises that the Local Plan should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land as required by para 147 of the NPPF.

3.6 The proposal for land to the east of Bilbrook identifies adjacent land, to remain in the Green Belt, to provide compensatory improvements. Such improvements will include the provision of public access as part of an overall green infrastructure strategy that will also secure improvements to environmental quality of this land.

Policy DS4: Development Needs

3.7 Bloor 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

- 3.8 The Strategic Housing Market Assessment (SHMA) 2021 sets out a minimum housing requirement of 254 dpa based on the Government's standard method, utilising the 2018 Affordability Ratios. Bloor 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.
- 3.9 The PPG is clear however that the standard method identifies a minimum annual housing need figure and does not produce a housing requirement figure recognising there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.
- 3.10 Paragraph 010 of the PPG (ID: 2a-010-20201216) states:

"Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;"*

- 3.11 Other circumstances that should be considered in respect of South Staffordshire District include the balance between homes and jobs created over the plan period.
- 3.12 These circumstances are considered in further detail below.

Unmet Need from Neighbouring Authorities

- 3.13 The unmet housing need arising from within the wider Greater Birmingham and Black Country Housing Market Area is well documented.
- 3.14 The Birmingham City shortfall was tested through the BDP EiP and an unmet housing need to 2031 of 37,900 homes was confirmed. Birmingham City Council has now commenced a review of the Birmingham Development Plan, with an

Issues and Options consultation published in 2022. The Issues & Options document recognised that the BDP was unable to identify enough land to meet all of Birmingham's housing need and there is still a need to work with neighbouring authorities within the Housing Market Area (HMA) to deliver a housing shortfall. Birmingham City Council has identified a shortfall of around 78,415 dwellings following an assessment of potential capacity from all sources. While this figure will be refined through Birmingham's plan making process, the shortfall to 2042 will remain significant.

- 3.15 The Black Country LPAs, were until this Autumn, undertaking a review of the Black Country Plan which is aligned to the timescales of the South Staffordshire Local Plan review. Evidence that informed the emerging Black Country Local Plan included an urban capacity assessment. The Urban Capacity Review (2019) concluded that the amount of housing need which could not be accommodated in the Black Country urban areas remained significant, at around 26,920 homes to 2038.
- 3.16 The Draft Black Country Plan 2018-2039, subject to consultation in 2021, identified a shortfall of 28,239 homes to be exported to neighbouring LPAs through the Duty to Co-operate.
- 3.17 The shortfall figures above did not take into consideration the 35% urban uplift introduced in December 2020 which would be applicable to both Birmingham and Wolverhampton.
- 3.18 The Black Country LPAs took a decision to abort the joint plan-making approach to instead progress separate Local Plans.
- 3.19 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.
- 3.20 Bloor 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

- 3.21 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.
- 3.22 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.
- 3.23 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.
- 3.24 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

- 3.25 Bloor 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

- 3.26 Bloor 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. Codsall/Bilbrook and Penkridge appear to achieve the highest services/facilities rankings of all villages within the district.

Spatial Distribution of Housing Growth

- 3.27 Bloor Homes supports the distribution of housing growth to the most sustainable villages, including Codsall/Bilbrook to deliver a higher amount of growth.
- 3.28 Housing growth also appears to be focused to the north of the district which aligns to the location of the Tier 1 settlements and the proposed employment strategy, that seeks to deliver thousands of new jobs in the northern extent of the district, including the freestanding and expanding employment site of i54 South Staffordshire within close proximity to Bilbrook.
- 3.29 Bloor Homes considers that the proposed development strategy not only assists in providing improved infrastructure but also has due regard to where housing needs exist.
- 3.30 This strategy provides the opportunity to ensure that the necessary homes, along with supporting infrastructure, would be delivered in a timely and coordinated manner, to meet both the local needs arising from within the district, alongside an element of unmet needs arising from the wider GBBCHMA.

4. Site Allocations

4.1 Bloor Homes has a number of land interests within South Staffordshire District. This representation relates to Land East of Bilbrook.

4.2 Bloor Homes recognises the importance of the two proposed strategic housing allocations in delivering the spatial strategy for the district to 2041. Due to the scale of the two sites, Bloor Homes supports the inclusion of site-specific policies to establish a vision for each site, alongside a requirement for a detailed masterplan and design code.

Policy SA1: Strategic development location: Land East of Bilbrook

4.3 Bloor Homes has worked collaboratively with the Council, the City of Wolverhampton City Council, other stakeholders, infrastructure providers and the Council's masterplanning consultants in developing a shared Vision and set of Objectives for the new neighbourhood east of Bilbrook. This process has been informed by the preparation of a range of site-specific technical documents prepared by Bloor Homes and evidence produced by the Council.

4.4 Bloor Homes supports this site Vision, Objectives and Concept Plan for Land East of Bilbrook contained within the Publication Plan. This will form the basis of further technical work and the ongoing preparation of a comprehensive masterplan and design code to inform a future planning application.

4.5 The emerging proposal for East of Bilbrook and a summary of technical work undertaken to date is set out in a Vision Document, attached to this representation at **Appendix 2**.

4.6 In respect of Land East of Bilbrook, the proposed strategic housing allocation, provides an opportunity to deliver 750 dwellings alongside new infrastructure as identified in Policy SA1. The key infrastructure and design requirements set out in Policy SA1 are supported by Bloor Homes.

4.7 Bloor Homes' land interests extend to all land within the proposed East of Bilbrook allocation, with agreements in place between the landowners and Bloor Homes, providing confidence that a comprehensive and co-ordinated approach to development can be achieved in its delivery.

4.8 Bloor Homes can demonstrate the site is suitable, available and achievable, with further information provided within Chapter 12 of this representation and the Vision Document attached at **Appendix 2**.

Policy MA1: Masterplanning Strategic Sites

- 4.9 Bloor Homes supports the Council's masterplanning approach to ensure high quality design. Bloor Homes confirms that a comprehensive and deliverable site-wide Strategic Master Plan will be prepared in respect of the Strategic Development Location at Bilbrook. This will be prepared in conjunction with the Council and informed through pre-application discussions.
- 4.10 It is the intention of Bloor Homes to prepare this site-wide Strategic Master Plan (SMP) to inform a future planning application, recognising that this Masterplan will be agreed prior to the determination of any planning application.
- 4.11 The SMP will be prepared having regard to the requirements established through SA1 and the suite of proposed development management policies. In addition, the preparation of a masterplan and design code will provide opportunity for a collaborative approach including engagement with the local community and key stakeholders. Engagement with key infrastructure providers through the Local Plan review process and through the collaborative approach in preparing the SMP should result in refinement of the Infrastructure Delivery Plan (IDP) with the identification of infrastructure requirements, costs and phasing of delivery.
- 4.12 Bloor Homes welcomes the amendment to Policy MA1 that provides further clarity in respect of the process for submitting and approving the SMPs.
- 4.13 Policy MA1's scope is appropriate, but it should be amended to ensure that it is effective in NPPF terms. The policy should allow for the approval of SMPs through the application process where an application has been submitted for any part of a strategic allocation. The policy should also clarify that SMPs should broadly align with the scope of Concept Plans, but that technical assessments should fundamentally drive the most appropriate proposal.
- 4.14 The Vision Document attached at **Appendix 2** demonstrates the emerging masterplan for East of Bilbrook which is broadly aligned to the Concept Plan.

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 Bloor Homes considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs. The assessment of needs should be routinely updated across the 20-year Plan period. This ensures that housing mix is reflective of market-driven need.
- 5.3 Bloor 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. Bloor 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 Bloor 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.
- 5.6 Due to the size of the site at Land East of Bilbrook and the lack of identified constraints, it is realistic to expect the delivery of an efficient scheme that could achieve a minimum average net density of 35-40dph. However, this would be achieved through the provision of character areas of varying densities and would be reflective of the character of surrounding development, including higher density development close to centrally located community facilities.

HC3: Affordable Housing

- 5.7 Bloor 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

Stage 1 Viability Study which determined the current affordable housing requirement of 40% affordable provision is very unlikely to prove supportable on larger schemes with significant infrastructure costs. The Stage 1 Viability Study confirmed that affordable housing within the range of 20-30% is potentially relevant to strategic housing sites overall, assuming a maximum of £9,200/dwelling S106 costs and no additional CIL contribution.

- 5.8 It is recognised that the Stage 2 Viability Assessment builds upon the Stage 1 findings and includes updated assumptions on development costs and values, including a review of the two strategic sites. For Land East of Bilbrook the appraisal appears to assume approximately £14,000/dwelling S106 costs and no additional CIL contribution, although this is not clear within the site appraisals. Bloor Homes recognises that S106 costs will be subject to change at the planning application stage.
- 5.9 Viability is dynamic and the Council's evidence relates to a snapshot in time. Therefore, Bloor 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

- 5.10 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.
- 5.11 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."

- 5.12 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.

- 5.13 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.
- 5.14 The SHMA published in 2021 identified a need for 1,793 accessible and adaptable general homes for those over 65 and 1,235 for those under 65 to 2038. The latest SHMA (2022) increases this identified need to 2,172 accessible and adoptable general homes for those over 65 and 851 for those under 65 to 2040. The latest SHMA (2024 Update) does not appear to provide an updated figure. It is not clear why these figures have altered so significantly between 2021 and 2022, however, the need equates to less than 50% of the planned housing supply to 2041. Bloor 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

- 5.15 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.
- 5.16 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 on demand is set out within the 2024 SHMA.
- 5.17 Bloor 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 Bloor 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.
- 6.2 It should be noted that the proposal at Land East of Bilbrook has already been subject to significant discussion with stakeholders and further consultation will be undertaken in line with the provisions of Policy MA1 in the preparation of a strategic masterplan.

HC12: Space About Dwellings & Internal Space

- 6.3 Bloor Homes has limited comment in respect of the external space standards that reflect existing policy which are generally considered appropriate.
- 6.4 However, if bungalows are to be provided within a scheme, it would seem logical to relax garden sizes or allow for the provision of communal/shared gardens to ensure efficient use of land and to reflect any desire from the market for low-maintenance external amenity areas. This approach is also likely to align to any appropriate space about dwellings requirements which should reduce the necessary distance between principal facing windows for ground floor windows, where intervening boundary treatments would interrupt views.
- 6.5 Bloor Homes do however object to the internal floorspace policy requirement for all homes to meet Nationally Described Space Standards (NDSS).
- 6.6 The NDSS were published by the Department of Communities and Local Government on 27th 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.
- 6.7 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."

6.8 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 makers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy."

6.9 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."

6.10 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."

6.11 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.

6.12 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.”

- 6.13 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.
- 6.14 The SHMA 2021 and 2022 Update provide limited commentary in respect of NDSS. The SHMA 2024 provides no further evidence. 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.
- 6.15 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

- 6.16 Bloor Homes supports the proposed parking standards contained within the Publication Plan.
- 6.17 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

HC14: Health Infrastructure

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

HC15: Education

- 7.3 Bloor Homes supports Policy HC15 in respect of education infrastructure which appears to represent a continuation of the current approach.
- 7.4 It should be noted the Land East of Bilbrook is proposing to allow for the provision of a new first school to serve the proposed strategic allocation. This is a requirement set out in Policy SA1. The proposed location for the proposed First School is co-located with the proposed community hub and provision for the elderly.

HC17: Open Space

- 7.5 Bloor 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).
- 7.6 Concern is raised that the emerging requirements appear to provide no flexibility with regards to a site's context. For example, the assumption that all on-site open space should include equipped play provision as a default is unreasonable where good quality, accessible equipped play is already located within the immediate vicinity of a site.
- 7.7 Bloor 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.

- 7.8 The illustrative masterplan for Land East of Bilbrook, introduced at **Appendix 2**, demonstrates the delivery of public open space in excess of the 0.006ha requirement and the provision of a range of formal and informal play provision as part of a network of multi-functional green spaces.

HC18: Sports Facilities & Playing Pitches

- 7.9 Bloor Homes notes the Indoor Sports Facilities Strategy and Playing Pitch Assessment/Strategy that forms part of the evidence base for the emerging Local Plan.
- 7.10 Bloor 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 where evidence recognises there is a shortfall in capacity to meet the generated demand.
- 7.11 The policy allows for a financial contribution to improve existing facilities in lieu of new on-site provision where appropriate. This reflects Policy SA1 which seeks enhancement of and provision of additional playing pitches within an existing recreational open space to the north of Pendeford Mill Lane as part of the East of Bilbrook development.

HC19: Green Infrastructure

- 7.12 Bloor Homes supports the policy approach to protecting, maintaining and enhancing where possible a network of interconnected, multi-functional and accessible green and blue spaces
- 7.13 Bloor Homes supports the provision of multi-functional greenspace as part of strategic developments.
- 7.14 Again, the illustrative masterplan included at **Appendix 2** demonstrates the delivery of multi-functional, interconnected, accessible green and blue spaces as part of the comprehensive proposal for East of Bilbrook.

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 Bloor Homes.
- 8.2 Bloor Homes is committed to doing its part to help to resolve the well-documented national housing crisis, and in doing so recognises that addressing the construction skills shortage is of critical importance. Bloor Homes as a company has committed to the Home Building Skills Pledge, and in doing so have or are putting in place the following initiatives on a business wide basis:
- Relaunch and expansion of their unique apprenticeship scheme in 2014. They directly employ over 1002 apprentices at any one time on a 3-year programme, which represents around 15% of their workforce. The Bloor scheme is unique in that they directly employ at least two apprentice masters in each region (bricklaying and carpentry). The apprentice masters all have site and teaching experience, and are paid and incentivised solely to bring apprentices through the programme (i.e. they are not also expected to carry out work as a tradesmen alongside their mentoring roles).
 - Ongoing trainee programme. Alongside the apprenticeship scheme, the trainee programme seeks to take in at least four trainees per region each year in the technical (architecture and engineering), surveying, sales and site management departments.
- 8.3 Whilst Bloor Homes recognises the importance of providing employment and skills initiatives that will impact on directly on the local areas in which they develop, the limitations arising as a result of the business model employed by Bloor Homes and all of the other major housebuilders should also be taken into account:
- All major housebuilders typically operate each site with a handful of directly employed staff (Site Manager, Assistant Site Manager, Labourer, Forklift Truck Driver etc) with all trades being sourced through subcontract businesses.
 - Direct employees as a rule move from development to development as one site nears completion and the construction of others starts, rather than being recruited from the area local to the development.

- Management and back-office support teams are based in regional hubs – for example, the Midlands region has an office in Tamworth which at present covers an operating area stretching from Leicester to Shrewsbury on an east-west axis and from Nottingham to Stratford upon Avon on a north-south axis

8.4 As a result, it is unrealistic to expect students near a given development site looking for management and back-office work experience to travel to the regional office, which could be up to 50 miles away. In addition, due to the sub-contracting of the majority of the trades on any given site, such an ESP may not be able to provide any measurable evidence on local job creation or provide certainty in respect of inclusive growth.

9. Community Services, Facilities & Infrastructure

EC8: Retail

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

EC11: Infrastructure

- 9.4 Bloor 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.
- 9.5 Land East of Bilbrook is a larger strategic proposal that can facilitate significant infrastructure provision. The site can deliver the following emerging infrastructure opportunities identified within the Infrastructure Delivery Plan 2024 (IDP):
- **Education:** 1.5 FE First School with land to expand to 2FE
 - **Green Infrastructure:** network of green and blue infrastructure running through the site including central green space (including equipped play) and off-site open space delivered to the south of the site to meet the requirements for Green Belt compensatory measures.
 - **Retail/local centre:** Small local convenience retail to serve the day to day needs of the neighbourhood
 - **Highways:** Mitigation requirements informed by TA for the site, but likely to include junction improvements/signalisation at Pendeford Mill Lane/Barnhurst Lane and Wobaston Road/Lawn Lane.
 - **Sustainable transport/active travel:** Potential new bus service in Bilbrook to serve proposed development and walking and cycling infrastructure

improvements associated the site including consideration of routes to Bilbrook Middle School and canal towpath improvements on NCN route 81.

- **Health:** financial contributions towards improvements to primary care, subject to ICB request
- **Playing pitches:** financial contributions towards improvements (including increased capacity) to nearby existing playing pitches.

9.6 Bloor Homes is committed to engaging with the District Council, and other stakeholders to explore infrastructure requirements to inform future iterations of the Infrastructure Delivery Plan and the emerging proposal for Land East of Bilbrook. Engagement with key infrastructure providers through the Local Plan review process has taken place through the masterplanning process which has informed the Infrastructure Delivery Plan (IDP) however further engagement is ongoing to provide absolute clarity in respect of infrastructure requirements, costs and phasing of delivery. This will inform the strategic masterplan and any associated design code.

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

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

10. Protecting & Enhancing the Natural Environment

NB2: Biodiversity

- 10.1 The intention of Policy NB2 is recognised, however, the Government policy and guidance already requires a 10% biodiversity net gain. Any policy should require a net gain in line with latest Government legislation, policy or guidance.

NB3: Cannock Chase SAC

- 10.2 Bloor 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 Bloor 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 Bloor Homes considers Policies NB6A and NB6C, 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. Bloor 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 East of Bilbrook

- 12.1 This Chapter sets out a brief description of Land East of Bilbrook, followed by an assessment of the site against each of the Council's site selection criteria, as defined within the Housing Site Selection Topic Papers published in 2021, 2022 and 2024.
- 12.2 A Vision Document has been prepared and is attached at **Appendix 2** to this representation which provides further detail.

Site Description

- 12.3 Bloor Homes has current land interests to the east of Bilbrook as shown on the Site Location Plan appended to this representation (see **Appendix 1**).
- 12.4 The site comprises a number of field parcels and several agricultural buildings, located off Pendeford Mill Lane.
- 12.5 The site encompasses several smaller parcels of land that are identified through the adopted Site Allocations Document as safeguarded land (ref: 443 and 209). The remainder of the site is located within the West Midlands Green Belt.
- 12.6 This proposed strategic development location represents a logical and sustainable urban extension to the Tier 1 settlement of Bilbrook, providing an opportunity for delivering approximately 750 additional new homes with associated supporting infrastructure, including the provision of a new first school, a new mixed-use community hub and a new primary road between Lane Green Road, Pendeford Mill Lane and Barnhurst Lane.
- 12.7 An illustrative masterplan identifies the following key components:
- Provision of up 750 homes and specialist older persons accommodation of approximately 75 units;
 - Provision of a centrally located first school (capable of expansion to 2FE) and mixed-use community hub centred around a new piazza;
 - Provision of approximately 16.4 hectares of green and blue infrastructure, evenly distributed throughout the site, including provision of amenity greenspaces, green corridors, SuDS and equipped play;
 - Incorporation of existing watercourse;

- Creation of a new primary through route between Lane Green Road, Pendeford Mill Lane and Barnhurst Lane; and
- Provision of footways and cycleways to provide active travel links with existing infrastructure.

12.8 A Vision Document has been prepared by Define which provides further detail in respect of the site and progression of the proposal in line with Policy MA1 and is included at **Appendix 2** to this representation.

Sustainability Appraisal (SA) Findings

12.9 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.

12.10 It is noted that the post-mitigation site assessment for Land East of Bilbrook (Site 519) scores the site a single negative against SA Objective 11 (Education) due to the site being located outside of the target distance for education for all primary ages. This appears irrelevant on the basis the site can provide a new First School to address current capacity issues as required by Policy SA1. It should be noted that Policy SA1, which relates to Land East of Bilbrook, achieves a score of double positive in respect of this Objective.

12.11 The site also scores a negative against SA Objective 12 (Economy & Employment) which suggests the site is in a location that has an unreasonable or poor access to employment opportunities. This score is disputed on the basis the site lies adjacent to active travel links to the nearby i54 strategic employment site as recognised within the Housing Site Selection Paper. This identifies a 'linear, well-lit cycle path also runs east from the northern edge of the site along the Wodbaston Road to the strategic employment site at i54, which is less than a mile from the site.' This is correctly assessed in the Sustainability Appraisal in respect of Policy SA1.

12.12 Nevertheless, the site is located adjacent to the current built up area of Bilbrook with good access to the village centre, including being within walking distance of its many facilities and bus/train links.

12.13 The site also benefits from good access to further services and facilities located within the wider urban area, including Wolverhampton.

12.14 The site is therefore sustainably located.

Sequential Test

12.15 The Council's spatial development strategy identifies an infrastructure led approach to growth. Bloor Homes agrees that additional growth is required in the Tier 1 settlements of Codsall/Bilbrook, beyond the existing levels of safeguarded land and urban capacity to deliver this infrastructure-led approach. This will require the release of further Green Belt land.

Green Belt Harm

12.16 It should be noted that Land to the East of Bilbrook incorporates 12.5ha of land that was safeguarded to meet longer term housing needs within the Site Allocations Document. However, an element of the site lies within the West Midlands Green Belt, adjacent to the current built up area of Bilbrook and within walking distance of its many facilities and bus links.

12.17 Whilst the Council's Green Belt Assessment (2019) indicates that development of the site would result in a 'high' level of harm to the purposes of the Green Belt, the conclusion for Green Belt Sub-Parcel ref: S46Cs2 confirms the weakening of the Green Belt in respect of releasing this site for development would be limited:

"The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. Although this land contributes to the Green Belt gap between surrounding settlements, those parts of the sub-parcel that do not extend into the more vegetated River Penk corridor are more closely associated with adjoining existing development, and therefore their release would constitute a limited weakening of the Green Belt."

12.18 The conclusion that the release of this site would constitute a limited weakening of the Green Belt is supported by Bloor Homes.

12.19 The Housing Site Selection Paper identifies that the 'vast majority of the site's Green Belt area is identified as having high harm.' It should be recognised that all land within the proposed strategic housing allocation is identified as 'high harm' with the 'very high harm' relating to solely to proposed green infrastructure beyond the southern boundary of the proposed allocation. This is recognised within the Site Proforma which concludes an allocation of up to approximately 38ha could be delivered without encroaching on areas of very high harm.

Landscape Sensitivity

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

- 12.21 Whilst the findings of the Landscape Study are not necessarily disputed by Bloor Homes, the site has previously been assessed through the Site Allocations Document process as having a 'low impact' on landscape sensitivity. It is, therefore, not understood how the landscape sensitivity of the site has increased, particularly now land at Pendeford Mill Lane (Site Allocation Ref: 443) has a consent for the delivery of 164 homes.
- 12.22 Nevertheless, it is considered that the development of the site for residential purposes represents an opportunity to strengthen existing field boundaries within and to the edges of the site. Furthermore, the development of the site facilitates the opportunity to provide a strong landscape strategy, which would serve to define the western edge of Bilbrook.
- 12.23 The landscape strategy proposes the following key features:
- Retention, as far as possible, of the existing elements that make up the site's green infrastructure, such as trees and hedges and integrating these into the development, giving the scheme an immediate sense of maturity;
 - Provision of a network of inter-connected green spaces that help to provide visual relief to the built form;
 - A clear hierarchy of public open spaces including a Central Green, a linear park along Barnhurst Lane and a large multifunctional area of public open space at the south-west corner of the site providing a buffer to the adjacent railway line;
 - Ensuring the gaps in the existing hedge adjacent to Pendeford Mill Lane and Barnhurst Lane are in-filled with native trees and hedge planting. Evergreen species of holly should be included in the mix to provide effective screening through the winter months; and
 - Ornamental and native hedge planting to be planted in and around the proposed development to soften any adverse effects of the built form.
- 12.24 The long-term residual effects of the development are not considered likely to exceed minor moderate in terms of significance to the overall landscape and visual amenity. Potential adverse effects that have been identified to be present at the operational stage, especially on the site and its setting will be reduced and offset by the mitigation provided in the potential planting scheme described within the landscape strategy.

12.25 It is contended that the site is able to accommodate the proposed residential led development without causing undue harm to the landscape character and visual amenity of the site and surrounding countryside and footpath network.

Impact on the Historic Environment

12.26 Bloor Homes has commissioned Orion to prepare a heritage report, which draws together the available archaeological, historic, topographic and land-use information in order to clarify the heritage significance and archaeological potential of land proposed for development.

12.27 The assessment establishes that there are no designated heritage assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Battlefields, Registered Historic Parks or Conservation Areas) within the study site, and that development of the study site will not affect the significance of any designated heritage assets, nor their settings, in the surrounding area.

12.28 In summary, the technical work undertaken to date concludes there are no heritage constraints to the allocation of the site for residential development.

Surface Water Flooding

12.29 The site lies within Flood Zone 1 which has the lowest probability of flooding.

12.30 A Sustainable Drainage Strategy (SuDS) is proposed:

- To efficiently drain the site whilst not causing flooding downstream;
- To create suitable habitats to promote biodiversity;
- To create ecological corridors across the site;
- To create an aesthetically pleasing setting for development; and
- To promote the site as a sustainable place to live and work.

Highways (Accessibility to the Site)

12.31 The scheme proposes a new primary roundabout access located to the east of the approved access on Pendeford Mill Lane.

12.32 Additional primary access points into the site are proposed off Lane Green Road and from the east off Barnhurst Lane.

- 12.33 The proposal would create a new primary route between Lane Green Road, Pendeford Mill Lane and Barnhurst Lane which may assist in relieving congestion within the existing village. In addition, new routes are proposed to connect the proposed new homes with the existing network of streets to promote sustainable modes of travel to support existing services within Bilbrook.
- 12.34 An emphasis is placed on active travel with the provision of footways and cycleways providing a high level of permeability within the site and links beyond the site to existing services and facilities.

Impact on Current Land Use

- 12.35 The site currently comprises several parcels of land utilised for agricultural use and used mainly for grazing. There are no Public Rights of Way across the site and contains no publicly accessible open spaces or community uses that would be lost as a result on development.
- 12.36 To the contrary, the proposal would deliver new public open space and community facilities that would benefit Bilbrook, including a new first school and equipped play areas.

Impact on Natural Environment

- 12.37 There are no statutory designated sites of nature conservation value within or immediately adjacent to the site. The nearest SSSI is Big Hyde Rough SSSI which is located approximately 5.2km north of the site. This SSSI is designated as ancient woodland habitat containing a large floristic diversity. This SSSI is well separated from the site by major and minor roads and open countryside, and as such it is not considered there will be any adverse direct or indirect effects on this statutory designated site as result of the proposals. The site lies outside the Impact Risk Zone for the Big Hyde Rough SSSI.
- 12.38 The nearest Local Nature Reserve (LNR) is Smestow Valley LNR which is located over 1.5km southeast of the site. This LNR is designated for its pockets of woodland and meadow and its importance to birdlife and is separated from the site by open countryside, minor and major roads and existing residential development, and as such, it is not considered there will be any direct or indirect adverse effects on this statutory designated site.
- 12.39 There are no non-statutory designated sites within or immediately adjacent to the site.
- 12.40 There are a number of hedgerows present within the site which define boundaries including along Pendeford Mill Lane, Barnhurst Lane, Lane Green

Road and the boundary with the railway line. Internal field boundaries are also defined by hedgerows.

- 12.41 Existing trees within the site are largely confined to internal hedgerows although there is a scattering of individual trees towards the northern extent of the site.
- 12.42 The agricultural land contained within this site is believed to be predominantly Grade 3 (split of 3a and 3b is unknown at this time).
- 12.43 However, the same is true for the majority of land around Bilbrook and therefore should not reflect negatively against this site.

Impact on Environmental Quality

- 12.44 The agricultural site is unlikely to have significant issues in relation to contamination, and the surrounding context of the site is not considered to represent constraints in relation to air quality and noise.
- 12.45 Whilst it is accepted that development is unlikely to improve the environmental quality of the site, as there are no existing issues of contaminated land, development would not give rise to any further environmental quality issues.

Site-Specific Opportunities

- 12.46 As set out previously within this representation, the development of the site for residential purposes presents the opportunity to deliver a new First School, which is identified within the Council's Infrastructure Delivery Plan as a key requirement.
- 12.47 In addition, the proposal would deliver a new through route between Lane Green Road, Pendeford Mill Lane and Barnhurst Lane aligned to the aspiration of the local community.
- 12.48 Further detail in respect of the large multifunctional area of public open space at the south-west corner of the site, to remain within the Green Belt, is provided within the accompanying Vision Document, included at **Appendix 2** to this representation.
- 12.49 This represents a significant benefit of allocating Land East of Bilbrook, for residential development.

Suitability

- 12.50 The information set out above, read in conjunction with the appended Vision Document, demonstrates that Land East of Bilbrook is a suitable site.

Deliverability

- 12.51 There are agreements in place between the landowners and Bloor Homes to facilitate the development of the site.
- 12.52 Bloor Homes intends to undertake further technical work to demonstrate the deliverability of land east of Bilbrook, however information gathered to date concludes that there are no physical or other constraints likely to render the site undeliverable within the proposed Plan period to 2041. The site is available now.
- 12.53 The site is deliverable and immediately available and, subject to allocation and removal of an element of the site from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years. Bloor Homes already recently completed construction of 164 homes accessed off Pendeford Mill Lane which would represent the first phase of the wider Land East of Bilbrook proposal.

13. Conclusion

- 13.1 This representation is made by Evolve Planning on behalf of Bloor Homes to the South Staffordshire Local Plan Review, updated Publication Plan (Regulation 19) consultation. This representation relates to land at East of Bilbrook, a proposed strategic development location, which Bloor Homes is promoting for residential-led development.
- 13.2 Bloor Homes supports the Council's proposed spatial development strategy, which includes the proposed strategic allocations Bilbrook. Focusing growth to Tier 1 and Tier 2 settlements provides a sound approach to distributing housing growth.
- 13.3 Bloor Homes supports the proposed Local Plan, however specific comments are provided in respect of the housing requirement, a number of development management policies and the Council's consideration of the evidence base in relation to Land East of Bilbrook.
- 13.4 The information contained within this representation, read in conjunction with the appended Vision Document and the Council's published evidence base demonstrates that Land East of Bilbrook is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 13.5 It is therefore submitted that Land East of Bilbrook represents a sound strategic housing allocation.

APPENDIX 1

Site Location Plan

LEGEND
— Wider Application
— Site Boundary



APPENDIX 2

Vision Document

BLOOR HOMES[®]



**BILBROOK
GREEN**

A New Neighbourhood for Bilbrook

OUR VISION IS TO CREATE A BEAUTIFUL NEW NEIGHBOURHOOD FOR BILBROOK DESIGNED TO RESPOND TO THE CHALLENGES OF THE CLIMATE EMERGENCY BY EMBRACING SUSTAINABLE DESIGN AND CONNECTING PEOPLE WITH NATURE.





Bilbrook Green will provide a mix of homes for all ages, needs and means as well as a new first school, community facilities and open green spaces and corridors to promote a healthy, active and connected community.

Benefits

BILBROOK GREEN WILL BE A BEAUTIFUL, WELL-DESIGNED, SUSTAINABLE NEIGHBOURHOOD WHERE PEOPLE CAN LIVE, WORK AND PLAY IN WAYS THAT SUPPORT HEALTH AND WELLBEING, WHILE MITIGATING CLIMATE CHANGE AND CONTRIBUTING TO THE SUCCESS AND VITALITY OF A NEW INTEGRATED COMMUNITY.

- Up to 750 homes to meet local needs.
- Extra Care facility to meet needs of older persons.
- A new first school and additional land to support future expansion.
- A new community hub featuring a flexible community space and centrally located piazza.
- Extensive network of green spaces throughout the site featuring open space and play areas for children.
- Extensive network of greenways, cycleways and footways.
- Off-site highways improvements to connectivity and foster sustainable travel.
- Improvements to existing sports facilities to the north of Pendeford Mill Lane.

This is a suitable, achievable and deliverable site which can, if allocated, assist South Staffordshire District Council in realising its ambitions for sustainable, infrastructure-led, growth.

LAND BUDGET

SITE AREA

40.21
HECTARES

NET DEVELOPMENT AREA

→ 19.93 ←
HECTARES



DENSITY: c.37.5
DWELLINGS PER HECTARE



CAPACITY



c. 750 UNITS
(INCLUDING AFFORDABLE UNITS)

GREEN INFRASTRUCTURE (ON-SITE):

c. 16.4
HECTARES



The Journey to Sustainable Living

WE ARE LIVING AT A TIME OF CLIMATE EMERGENCY. BLOOR HOMES IS EMBRACING THE NEW TECHNOLOGIES AND TECHNIQUES REQUIRED TO ENSURE THE COMMUNITIES IT DELIVERS HELP TO COUNTERACT THIS AND WILL ENSURE THAT BILBROOK GREEN WILL SUPPORT THE COUNCIL'S CLIMATE CHANGE STRATEGY TO MINIMISE CARBON EMISSIONS AND MAXIMISE ENVIRONMENTAL AND ENERGY EFFICIENCY.

We will:

- Build homes that consume less energy by using the latest materials and techniques to maximise insulation, air tightness and heat recovery, with no fossil fuel heating systems being installed beyond 2025, creating an uplift in energy efficiency of 75-80%.
- Procure materials from sustainable sources and recycle construction waste as far as is possible.
- Install sanitaryware and appliances that meet the highest water efficiency standards.
- Provide electric vehicle (EV) charging points for all dwellings with on plot parking, together with access to communal EV charging points for the whole development.
- Provide extensive, multi-functional green spaces that provide social and recreational for all of the community.
- Prioritise sustainable travel modes within the development, delivering a truly walkable neighbourhood.
- Achieve a minimum 10% biodiversity net gain.



Growth Where it is Needed

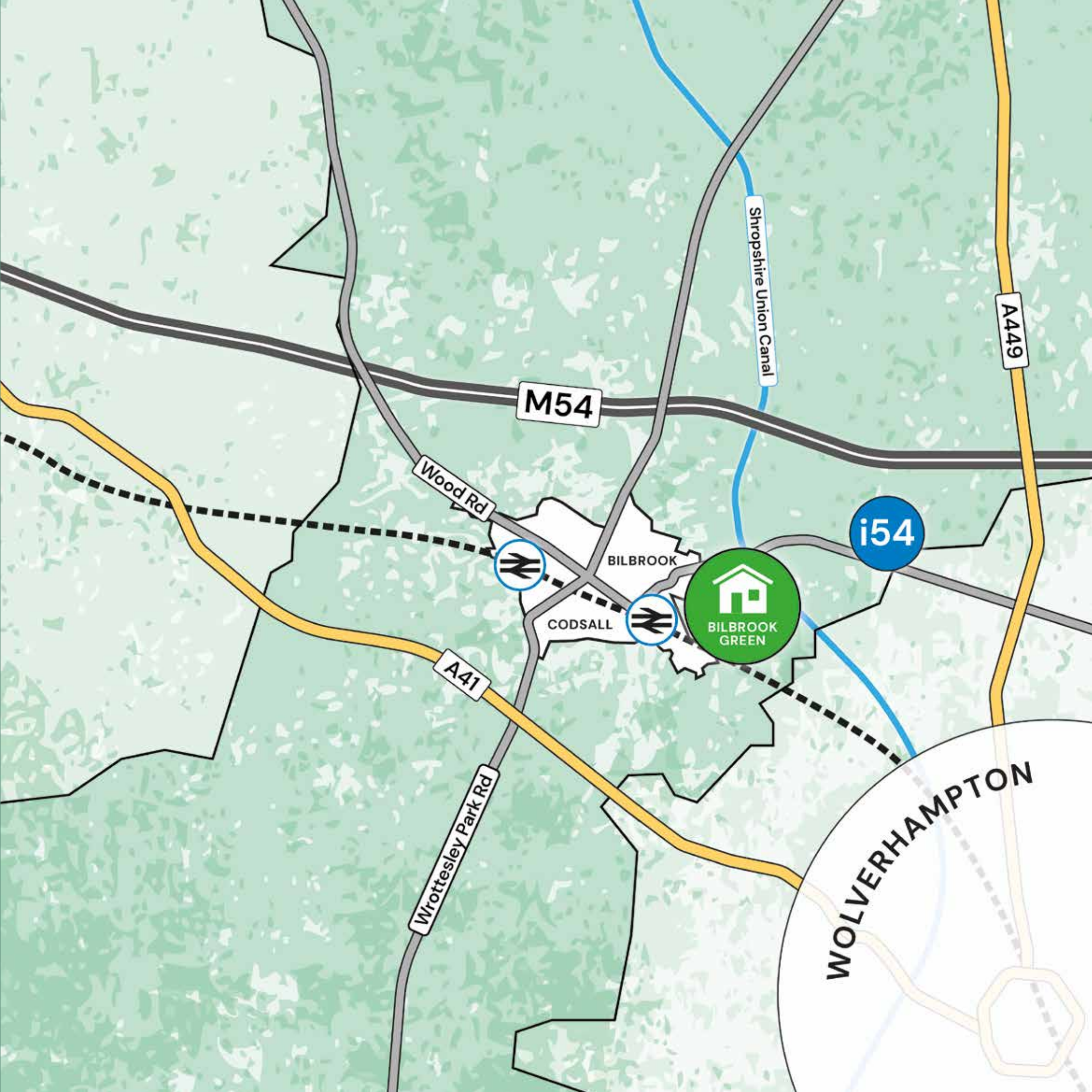
LOCATED TO THE EAST OF BILBROOK AND APPROXIMATELY 1KM TO THE WEST OF I54, BILBROOK GREEN IS IN A SUSTAINABLE AND LOGICAL LOCATION TO ACCOMMODATE SOME OF THE DISTRICT'S FUTURE GROWTH.

As one of the most sustainable villages within the District, Bilbrook plays an important and established economic, social and environmental role, and inevitably this brings significant housing need.

Sustainable development is about ensuring those needs are met as close as possible to where they arise.

A major benefit of larger scale development in a single site is that comprehensive infrastructure, facilities and services can be brought forward alongside substantial numbers of new homes.





M54

A449

Wood Rd

Shropshire Union Canal

i54

BILBROOK

BILBROOK GREEN

CODSALL

A41

Wrottesley Park Rd

WOLVERHAMPTON

A Place with a Heart

THE THRIVING LOCAL CENTRE AT THE HEART OF BILBROOK GREEN WILL FEATURE A SCHOOL, SHOPS, A NEW PIAZZA AND FLEXIBLE COMMUNITY SPACE FOR PEOPLE TO SHOP, WORK AND PLAY LOCALLY.

The focus of the local centre will be a new community piazza and flexible community building, which could include co-working space, meeting facilities, a café, a nursery, indoor play facilities and other services, to provide opportunities for people to work where they live. A new piazza provides a central social space providing opportunities for community events.

A new first school, located centrally, will resolve existing longstanding pressures placed on existing schools within Bilbrook and Codsall and provides flexibility for further longer-term expansion.

Other uses include later living accommodation and the opportunity for health facilities and places to eat and drink.





A Connected Community

THE DEVELOPMENT IS SUSTAINABLY LOCATED WITH A RANGE OF SERVICES AND FACILITIES WITHIN WALKING AND CYCLING DISTANCE, WHICH WILL BE ENHANCED THROUGH NEW PEDESTRIAN / CYCLE CONNECTIVITY AS PART OF THE DEVELOPMENT.

















A network of greenways, cycleways and footpaths within the site will take pressure off local roads and contribute to residents' health and wellbeing. Footway and cycleway upgrades beyond the site will result in improved sustainable connections with Bilbrook Station, i54 and Wolverhampton, will help minimise use of the private car.

There is a great opportunity to deliver improved connectivity and sustainable alternatives to private car use, including:

- Streets and green corridors designed for walking and cycling, not dominated by the private car.
- Upgraded active travel routes beyond the site to railway station, schools, i54 and Wolverhampton and the provision of new pedestrian crossings



Legend

	Site Boundary		National Cycle Route 81
	Primary Street with Active Travel		i54 Footpath & Cycleway
	Secondary Street with Active Travel		Monarch's Way
	Functional Active Travel Route		School
	Recreational Active Travel Route		SOPH
	Potential Connection		Local Centre
	Walking / Cycling Route to Train Station		Residential Parcel
	Public Right of Way		Open Space



Homes for All

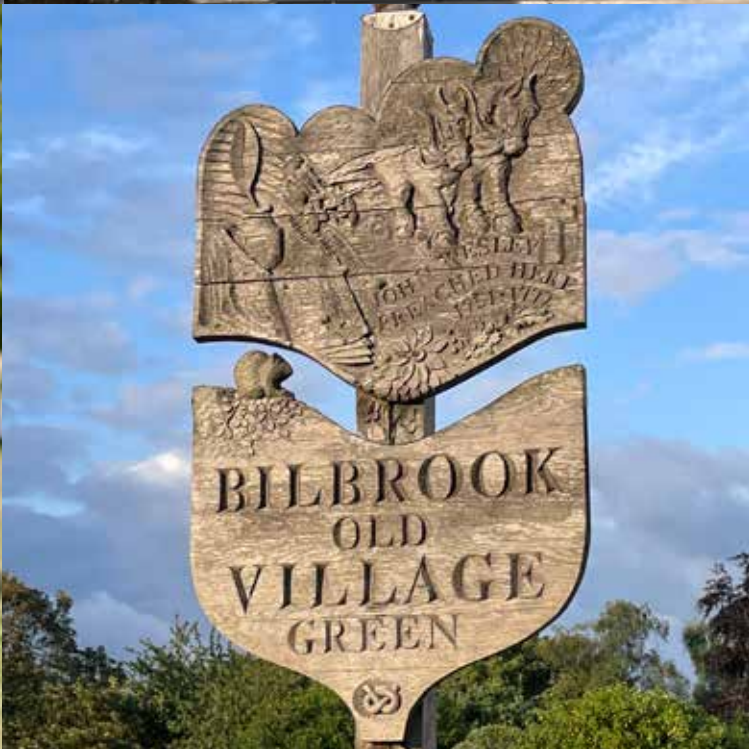
BILBROOK GREEN'S HIGH-QUALITY NEW HOUSING WILL BE POPULAR, SUSTAINABLY DESIGNED TO ACHIEVE LOW CARBON LIVING, AND BUILT TO LAST. THE VIBRANT NEIGHBOURHOOD WILL FEATURE APPROX. 750 HOMES FOR ALL AGES, FROM STARTER HOMES TO FAMILY HOMES TOGETHER WITH LATER LIVING AND EXTRA CARE ACCOMMODATION AS WELL AS AFFORDABLE PROPERTIES.

Bilbrook Green will be a beacon for beautiful and sustainable design.

Every home will be built with the space and technology to allow for comfortable home working via superfast data connections needed for modern living. Great design will provide flexibility to cater for future demands of residents.

As well as being beautiful, our homes will be cost effective to run. By making the homes energy efficient day to day running costs will be kept to a minimum to tackle fuel poverty and benefit everyone living Bilbrook Green.





The Bloor Homes Story

BLOOR HOMES WAS FOUNDED IN 1962 BY JOHN BLOOR. WE HAVE OVER 50 YEARS' CONTINUOUS EXPERIENCE IN PROMOTING AND DEVELOPING MAJOR HOUSING SCHEMES ACROSS THE UK.

Bloor Homes Limited through a combination of Bloor Homes, Triumph Motorcycles and Pickering Plant has a combined turnover of £1.3bn per annum and remains a financially independent and family owned business.

The Company has built an enviable reputation for the identification, promotion and delivery of major strategic sites across England, and these sites provide the lifeblood of our business.

The local planning authorities with whom we work to bring forward these sites can take comfort in the fact that they are dealing with a housebuilder who will design a scheme that accounts for the practical issues associated with development, ensuring reliable delivery of new homes, community facilities and associated infrastructure.

We very much look forward to working with the Council and other stakeholders to develop, refine and optimise our proposals for Bilbrook Green.





Define.

On behalf of:

BLOOR HOMES[®]





EVOLVE
PLANNING + DESIGN