

**SOUTH STAFFORDSHIRE LOCAL PLAN**

**PUBLICATION PLAN APRIL 2024**

**REGULATION 19 CONSULTATION**

**LAND AT POOL HOUSE ROAD, WOMBOURNE**

**REPRESENTATION PREPARED ON BEHALF OF**

**TAYLOR WIMPEY STRATEGIC LAND**

P23-1570

LPA Local Plan Site Ref Policy SA3, Site 285

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## Document Management.

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Appendix 1- Site Location Plan



# 1. Introduction

- 1.1. This representation responds to the South Staffordshire District Council's ('SSDC') Local Plan Review 'Publication Plan' ('the Plan') consultation held under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This is the second Regulation 19 Publication Plan published for consultation by SSDC and follows amendments made to the National Planning Policy Framework (NPPF) in 2023, resulting in a review of the Council's Spatial Strategy across the Plan Period.
- 1.2. Representations are made with regard to the Plan itself and to the accompanying published evidence, having regard to the NPPF.
- 1.3. This representation is made by Pegasus Group on behalf of **Taylor Wimpey Strategic Land (hereafter 'Taylor Wimpey')** who have a specific land interest in the proposed housing allocation in the Tier 2 settlement of Wombourne, identified at Policy SA3 as 'Site Ref No. 285 Pool House Road' with a minimum capacity of 82 homes ('the Site').
- 1.4. Taylor Wimpey has previously submitted details of the Site through the Regulation 18 Preferred Options Plan, as well as the earlier iteration of the Regulation 19 Publication Plan document consulted upon in 2022.
- 1.5. The draft site allocation extends to some 3.9ha, with Taylor Wimpey having a wider land interest extending to 5.4ha and is located in the highly sustainable settlement of Wombourne. The site lies to the north west of Wombourne adjoining residential development to the west and is safeguarded land for future residential development in the adopted 2015 Site Allocations Document (SAD).
- 1.6. The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The latest iteration of the NPPF (December 2023) at Paragraph 230 provides guidance on implementation and interim arrangements in relation to national policy. This sets out that where emerging local plans reach pre-submission consultation prior to 19th March 2024, plans will continue to be examined in the context of the previous September 2023 iteration of the Framework. Due to the publication of this round of consultation in April 2024, SSDC have prepared the Plan under the provisions of the latest NPPF December 2023, and these representations have been prepared accordingly having regard to this national policy context. To ensure the policies of the Plan are fully justified it is



important that Plan policies are consistent throughout with this new national policy framework.

- 1.7. The tests of soundness are set out at NPPF Paragraph 35. For a Plan to be sound it must be:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c) **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
  - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.8. The representations also address the legal and procedural requirements associated with the plan-making process.



## 2. Planning Policy Context

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

### **National Requirements for Plan-Making**

- 2.3. The existing Core Strategy for South Staffordshire was adopted in 2012, and as such a holistic review of the Plan is overdue. A Local Plan review is also committed to within the Site Allocations Document 2018.
- 2.4. NPPF 33 requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years. The proposed timescales, as set out in the Local Development Scheme (September 2023), will ensure that an up-to-date Local Plan for South Staffordshire will be in place to support growth and meet future development needs across the Plan period.
- 2.5. The Publication Plan consultation follows previous consultations on the Local Plan review. This included representations in 2019 to the Spatial Housing Strategy & Infrastructure Delivery document, along with consultation on the Preferred Options Regulation 18 Plan in 2021 and previous Publication Plan in 2022.
- 2.6. Amendments to the National Planning Policy Framework (NPPF) in December 2023 led to a review of the District's proposed spatial strategy across the Plan Period, resulting in the current version of the Publication Plan (2024). Taylor Wimpey have engaged at each stage of the plan making process.



- 2.7. The current consultation document represents SSDC's final version of the Plan and is being made in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), having considered representations previously made to the earlier Publication Plan in 2022, as well as further evidence.
- 2.8. NPPF Paragraph 24 also advises that local planning authorities "*...are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.*" In the context of South Staffordshire, strategic matters include housing, employment, infrastructure and the Green Belt.
- 2.9. Taylor Wimpey support SSDC's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists within the District to guide growth to 2041 and to ensure that development is genuinely plan-led. However, Taylor Wimpey do not support the quantum of proposed allocations in the Regulation 19 Publication Plan 2024 as it is considered the level of provision to be insufficient to meet the District housing needs.

### 3. Vision, Strategic Objectives and Priorities

- 3.1. The Publication Plan (Regulation 19) identifies a number of 'Issues and Challenges' surrounding homes and communities, economic prosperity and the natural and built environment. The Document goes on to present a 'Vision' based upon these issues and challenges, and a number of 'Strategic Objectives' by which the Vision can be achieved.
- 3.2. It is noted that the Vision remains broadly the same as that presented in the adopted Core Strategy with regards to the aspirations to protect and enhance the District's rural character, communities, and landscape. It is considered that it remains relevant and is broadly supported.
- 3.3. The Plan's Vision reflects the Council's declared climate emergency, with emphasis placed on providing homes which accord with the 'environmental objective' identified at NPPF Paragraph 8, that in order to achieve sustainable development, proposals should mitigate and adapt to climate change. It also seeks to '*protect and enhance*' the District as it currently exists, rather than thinking forward and considering how the growth proposed within the Plan can better the District as a whole.
- 3.4. Although the Vision is broadly supported it should be amended to reflect the need to meet both the present and future housing requirements, including those pressures arising through the Duty to Cooperate with neighbouring authorities, with specific reference to meeting the unmet housing needs of the GBBCHMA. The delivery to meet the housing requirements of the GBBCHMA is discussed further in this representation, however Taylor Wimpey considers that it should be included in the Vision to clearly demonstrate commitment to the statutory Duty to Cooperate.
- 3.5. The Vision seeks to create '*beautiful and thriving*' new places, however as stipulated in earlier representations to the previous Regulation 19 Publication Plan, there also needs to be a greater emphasis placed on a Vision which is locally relevant, and which picks up on the key issues and challenges identified for the District and how the Plan will seek to address these for the future of the District. Whilst the Vision is succinct, as currently written it is not considered to be relevant locally and contains no spatially specific elements, and this should therefore be reflected through further amendments to the Vision Statement.



- 3.6. Similarly to the earlier iteration of the Plan, it is recognised that the Strategic Objectives are refined versions of those presented in the adopted Core Strategy. This approach is broadly supported, and it is recognised that these remain relevant, particularly the recognition of the requirement to make a proportionate contribution towards the unmet needs of the GBBCHMA.
- 3.7. In relation to **Strategic Objective 2**, reference is made to meeting the housing and employment needs of the District with an overarching direction that that new housing should be focussed in sustainable locations in the District. It is considered this could be strengthened to reflect the need to meet the needs of both existing and new residents of the District.
- 3.8. To achieve balanced and sustainable growth across the District it is important that a range of sites are allocated for housing to ensure a balanced and reliable source of housing supply to meet not only the District's but also the wider HMA's unmet housing need over the Plan period. In determining what is considered to be a proportionate contribution to the HMA's unmet housing needs, SSDC must also ensure specific consideration has been given to the District's ability to make a significant larger contribution to unmet needs given it has a contiguous border with the West Midlands Conurbation. Greater recognition should be given to Tier 2 and 3 settlements as well as sites which relate well to the urban areas of adjoining authorities and can benefit from the sustainability of these locations including access to jobs, services, education and public transport provision.
- 3.9. The 'Issues and Challenges for South Staffordshire' as identified through community engagement are identified at Table 2 (page 13) of the Plan. Most notably this highlights the District's 'weaknesses' as
- demographic imbalance with a higher-than-average proportion of residents aged 65+, and a projected decline in families and working age residents, with resultant threat to some service provision;
  - reliance on neighbouring areas for higher order services and a dependency on their economic health for access to employment; and
  - poor public transport connectivity in parts of the district.



- 3.10. Alongside this, it continues that ‘threats’ to the District include the increasing pressure for development on land within the Green Belt to meet District’s housing needs and the needs of adjoining areas, which if not properly managed, could threaten the quality and character of the district, along with the lack of available brownfield land.
- 3.11. The emerging Plan provides the opportunity to support sustainable growth and positive change for the future of the District. This can be achieved through carefully planned strategic development which embraces the opportunities the District offers through high quality landscape led housing developments, delivering a range of homes to meet a mix of needs as part of balanced communities, whilst also delivering much needed infrastructure improvements across the District. Whilst the importance of brownfield sites is recognised, this balanced alongside strategic growth within open countryside and through Green Belt release is necessary to overcome those weaknesses identified by SSDC, ensuring the social and economic challenges of the District across the Plan period can be addressed in order to strengthen its future through the Plan period and beyond.

## 4. Development Strategy

### Green Belt

- 4.1. Policy DS1 (Green Belt) remains broadly consistent with the provisions of the NPPF with regards to development within the Green Belt. It sets out that the Green Belt boundary has been altered through the emerging Plan to accommodate proposed development allocations, with the boundaries of the reviewed Green Belt sites identified at Appendices B-E of the Plan and on the policies map.
- 4.2. In reviewing the Green Belt however, the previous iteration of the Plan as consulted upon in 2022 accommodated a much larger number of allocations within the Green Belt to deliver both the District and the wider HMA's housing needs across the Plan Period, amounting to over 9,000 new homes in the Period up to 2041. The current Publication document however has significantly reduced the amount of Green Belt land released for housing allocation, alongside a more contained Spatial Strategy for the District, with housing numbers to be delivered across the Plan period based on a 'bottom up' approach to housing capacity to meet the District's own need, and a limited contribution towards the unmet need of the GBBCHMA.
- 4.3. SSDC's preferred spatial strategy option, Option I, as identified in the Spatial Strategy Topic Paper 2024, focuses growth in sustainable non Green Belt locations, including safeguarded land and Open Countryside sites, alongside additional Green Belt allocations made adjacent to Tier 1 settlements (where Tier 1 settlements are the most sustainable locations in the District).
- 4.4. Having been previously removed from the Green Belt and identified as safeguarded land for future development, the proposed allocation of Pool House Road, Wombourne for housing offers an excellent opportunity to deliver much need new homes along with infrastructure improvements for the benefit of the District on land that is not within the Green Belt.
- 4.5. Policy DS2 (Green Belt Compensatory Improvements) provides additional detail on expected compensatory improvements for Green Belt released sites. Taylor Wimpey supports the inclusion of a policy setting out the need for Green Belt compensation in relation to sites being removed from the Green Belt. However, the policy contains elements of ambiguity, and its practical application is unclear. Whilst it is appreciated that SSDC have outlined that

'applicants must demonstrate proportionate compensatory improvements', this does not provide a clear requirement for Green Belt compensation.

- 4.6. The policy requires further clarification by identifying and naming which particular sites it is specifically intended to apply to, or alternatively, the individual site allocation proformas should identify when it is expected this policy would apply. For the avoidance of doubt, Taylor Wimpey's interest at Pool House Road, Wombourne, is safeguarded land, which was removed from the Green Belt in 2018 SAD, and it is not expected to be subject to this policy.

## **Housing**

### **Policies DS4 and DS5**

- 4.7. Policies DS4 (Development Needs) and DS5 (The Spatial Strategy to 2041) set out that SSDC will deliver a minimum of 4,726 dwellings across the Plan period up to 2041. This is a significant drop from the 9,089 dwellings identified in the previous 2022 Publication Plan.
- 4.8. There is a reduction in the housing delivery to meet the District's own need from 5,330 to a minimum of 4,086 dwellings based on the updated Strategic Housing Market Assessment 2024, paragraph 4.15, indicating a revised standard method of 227 dwellings per year to cover the local need across the Plan period 2018–2041.
- 4.9. There is also a very significant reduction in the 4,000 homes previously identified towards meeting the unmet needs of the HMA, with a contribution of only 640 homes now proposed towards this need. Within the revised Publication Plan however, whilst acknowledging the shortfall in housing supply across the wider Housing Market Area (paragraph 5.9), the Plan no longer goes as far as identifying a key role of the Plan as delivering homes to meet both its own housing needs and those of the wider GBBCHMA, but rather focuses on only meeting the District's own needs.
- 4.10. With regard to the District's own housing needs allocation (4,086 homes across the plan period), the Council have allocated the minimum figure of housing required by the Standard methodology. Taylor Wimpey objects to this position. This is considered to be insufficient to meet the District's housing needs.
- 4.11. The starting point for the identification of housing requirements is the 2014-based sub-national household forecasts as set out in National Planning Policy Guidance ('PPG') and the

utilisation of the standard method of calculation. PPG is also clear that the figure produced by the Standard Method represents a minimum figure, rather than a requirement. PPG continues to provide a non-exhaustive list of examples whereby additional growth beyond the minimum requirement may be appropriate, including relevant growth strategies for the area, strategic infrastructure improvements or accommodating unmet need from neighbouring authorities.

- 4.12. Having regard to the unmet housing need across the wider GBBCHMA, with no clear cross boundary redistribution agreements in place, the approach previously adopted under the 2022 Publication Plan in meeting this unmet HMA housing shortfall was more appropriate. Whilst it is acknowledged that the District continue to contribute towards the unmet housing needs of the wider HMA, the District should go further in providing additional homes to address the significant growing need across the GBBCHMA.
- 4.13. In light of the extended Plan Period, consideration must also be given to expected population growth up to 2041, along with the additional shortfall in housing across the GBBCHMA. Housing provision should therefore be considered in excess of the Standard Method, which should be treated as a minimum in order to support growth across the District and in promoting sustainable communities consistent with the spatial strategy proposed across the Plan period.
- 4.14. It is essential therefore that the Plan provides flexibility above the minimum housing requirement to allow for a buffer to ensure sufficient homes will come forward to meet need. The Plan currently provides a buffer of 10% however despite the significant reduction in housing numbers across the Plan period, this has been reduced from the 13% buffer included within the 2022 Publication Plan. In view of the 2024 Publication Plan reducing housing supply from the 2022 version, rather than reducing the buffer, it ought to be increasing it as there will be less supply overall and therefore a greater impact if sites don't come forward.
- 4.15. Although brownfield redevelopment is an important source of housing land supply, there are numerous constraints to the delivery of homes on previously developed land, such as the ability to achieve 10% biodiversity net gain, in particular given the high biodiversity value of open mosaic habitats which are commonly associated with brownfield sites which will result in a lower net developable area and less capacity to deliver housing numbers.

- 4.16. The NPPF at Paragraph 71 is clear that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.
- 4.17. Although historic windfall delivery rates have been taken into account the capacity of sites has been based on the ability of historic permissions across the District to achieve a capacity of 35dph. These developments were however based on less onerous policy provisions of the adopted Core Strategy, which did not require the delivery of 10% BNG, NDSS or M4(2)/M4(3) compliant homes for example, all of which have implications for the overall capacity of sites. In addition, it would appear that windfall sites have been double counted, with the Indicative Growth Table for Option I on which the housing delivery figures for the Plan have been based including windfall allowance for the period 2026–2041, covering the period 26/27 and 27/28 within the Council’s 5 year housing land supply (SHELAA Report 2023). Alongside this, the delivery assumptions made by the Council again have been based on historic rates of delivery, with an estimated lead in time of 2 years for sites without permission for developments of 5–15 homes and 15–49 homes: this would seem optimistic given the substantial delays experienced in the planning system as a result of under resourced LPA’s and increasingly complex planning applications including more recently the need to provide 10% Biodiversity Net Gain (BNG) on all sites.
- 4.18. The above points indicate that the Council could identify additional land for residential development with regards to their own evidence base and the national requirements for plan-making and housing delivery.
- 4.19. Notwithstanding, land at Pool House Road, Wombourne offers the opportunity to deliver much needed market and affordable homes to meet the identified need in the emerging Plan. The site will deliver infrastructure improvements through appropriate s106 contributions, policy compliant affordable housing and on site open space and biodiversity enhancements for the benefit of the wider community.

## 5. Site Allocations

### Housing Allocations

- 5.1. Following the previous iteration of the Publication Plan (2022), a number of amendments to the proposed housing allocations have been made. This includes the removal of 9 housing allocations.
- 5.2. Land off Pool House road (Site reference 285) is included within Policy SA3 as a draft housing allocation (as set out within Appendix C of the Publication Plan), for a minimum of 82 dwellings. The allocation is supported by Taylor Wimpey but some minor amendments are required to ensure the policy is sound and based on the latest available evidence.

### Housing Allocations- Policy SA3

- 5.3. Wombourne is a Tier 2 settlement with access to employment and facilities as well as a frequent bus route providing connections to Wolverhampton and Merry Hill. It is considered Wombourne is a sustainable settlement within South Staffordshire District Council, capable of supporting housing growth to meet housing need and accessible to public transport in line with the Plan's spatial strategy. The merits of Wombourne are discussed below in the context of draft allocation of Land off Pool House Road, Wombourne.
- 5.4. The recognition that Wombourne has sustainable qualities is long standing as evidenced in the previous Local Plan. Core Strategy Policy 1 of the South Staffordshire Core Strategy (December 2012) categorised Wombourne as one of nine 'Main Service Villages' within the current settlement hierarchy.
- 5.5. It is recognised that Wombourne benefits from an excellent level of essential community services and access to a wide range of public transport and supporting infrastructure. Wombourne also benefits from the following community facilities:
- Wombourne Civic Centre
  - Wombourne Village Hall
  - Dentist
  - Wombourne Library and Community Centre

- Wombourne Leisure Centre (fitness gym, toning suite, studio cycling and swimming)
- Medical Practice
- Play-tropolis (children's role-play centre)
- Public House, bars and cafes
- Several churches
- Wombourne High School
- 5 Primary Schools
- Nursery
- Numerous shops and services

5.6. Policy DS5 seeks to direct growth to the most accessible and sustainable locations within the District, and Wombourne is identified as a Tier 2 settlement, although this is a demotion from its current ranking within the adopted settlement hierarchy.

5.7. Paragraph 5.43 of the Publication Plan 2024 sets out that growth to Wombourne will be delivered through the delivery of safeguarded land, with no additional Green Belt release proposed. It continues to state that this is in recognition that Wombourne is a Tier 2 settlement. Taylor Wimpey support the development of Land off Pool House Road, Wombourne, as it is a safeguarded site and acknowledging that Wombourne is a sustainable settlement.

5.8. In addition to the above, Taylor Wimpey acknowledges that all draft allocations will be delivered in accordance with the individual site planning requirements set out by the site proformas in Appendix C of the Publication Plan. As outlined by the site proforma, it is noted that one of the specific requirements for the proposed allocation is for highway and pedestrian connectivity between site 285 and the adjacent draft allocation (site 459). It was set out in the pre-application meeting (24th November 2022) that due to intervening third party land on the public right of way, Taylor Wimpey cannot provide a link between the Site and Site 459. This position was agreed within the Statement of Common Ground (SoCG). As agreed within the SOCG, in order to provide connectivity between the Sites, a new footway



could be delivered from the site access of site 285 to the western boundary of site 459 within the land controlled by SCC Highway.

- 5.9. It is therefore necessary that the proforma be amended to state that only pedestrian access is required between site 285 and 459. This would ensure that the Site specific matters for Site 285 within draft policy SA3 is legally compliant in accordance with national planning policy and the signed Statement of Common Ground. The draft policy should also be updated, as appropriate, to take account of changes to other policies in the draft Plan as they relate to the development specifics for the Site.

### **Residential Use of the Land**

- 5.10. The Pool House Road (site reference 285) site is capable of early development in the first five years of the plan period.
- 5.11. The use of this Site for residential purposes has been enshrined within local plan policy since the adoption of SAD 2018. It has, therefore, long been established in policy terms that the Site is sustainable, suitable, available and deliverable for residential development.
- 5.12. By its very nature, 'Safeguarded Land' is land located between the urban edge and the Green Belt which is also required to be well integrated with existing development. As part of the allocation process in the SAD, the 'Safeguarded Land' was rigorously assessed in terms of the impact of future development upon environmental and landscape quality. By virtue of its earlier identification as 'Safeguarded Land', the residential use of the Site was confirmed as acceptable in principle by SSDC, and that confirmation is now endorsed by this Plan's positive allocation.
- 5.13. Previously, Core Strategy (2012) Policy GB2 retained the allocation of the Site as 'Safeguarded Land', and the Site remained outside of the Green Belt for the purposes of meeting future development needs in the District. Policy SAD3 of the Site Allocations Document continued to retain the Application Site as a 'Safeguarded Land' allocation, again strengthening the role of the Site in the future delivery of housing within the District.
- 5.14. The above historic context clearly evidences the Council's lengthy support of the Site's capabilities to meet the identified unmet housing need in a sustainable manner.

## **Sustainable Connectivity**

- 5.15. Wombourne is a sustainable and accessible settlement within South Staffordshire District, underpinned by its position as one of the nine 'Main Service Villages' at the top of the Settlement Hierarchy in the adopted Core Strategy and within the proposed 'Tier 2 Settlement' of the new settlement hierarchy proposed within the Plan.
- 5.16. The Site is well located and connected within the settlement of Wombourne itself which boasts a range of services and facilities. In terms of access to other main services and facilities in Wombourne, the Site is (all in approximate distances):
- 570m from Sainsburys Supermarket
  - 610m from the nearest bus stop (Giggetty Bridge)
  - 620m from Public House (Waggon and Horses)
  - 710m from St Bernadettes Catholic Primary School
  - 740m from Cherry Trees Community Special Primary School
  - 980m from Wombourne Leisure Centre
  - 980m from Wombourne High School
  - 990m from Dale Medical Centre
  - 1.57km from Willows Dental and Implant Centre
- 5.17. Wombourne is well served by frequent bus services running between Wolverhampton and Merry Hill.
- 5.18. When developed, the Site will encourage walking and cycling within the settlement, and also proposes to improve connectivity from the Site into the village.
- 5.19. It is considered that Wombourne is an appropriate location for the release of a previously safeguarded site and the proposed development would accord with the three dimensions of sustainable development identified within paragraphs NPPF Paragraphs 8.
- 5.20. The proposed development will introduce a raft of benefits including:



- Policy compliant 30% affordable homes on site
- Bungalow provision
- Mix of dwelling sizes and types which are compliant with policy
- Inclusion of M42 dwellings
- Public open space
- Encourage and support active modes of travel
- Retention (where possible) of existing hedgerows and trees to provide a green frontage and support wildlife foraging on site
- Planting of new trees and hedgerows

## 6. Development Management Policies

- 6.1. This section of the representations sets out specific comments on amendments required to specific development management policies, which are required in order for the Plan to be sound.

### **Policy HC1 – Housing Mix**

- 6.2. Housing mix should be guided by market signals as reflected in the most up-to-date assessment of needs. Such assessments will need to be updated over the course of the Plan period. The requirement that 70% of properties comprise of three-bedrooms or less is restrictive and does not afford the flexibility expected by NPPF Paragraph 63 in order to meet the need to provide for a range of size, type, and tenure for different groups.
- 6.3. Whilst the Plan recognises the need for 2 and 3 bedroom homes, the Strategic Housing Market Assessment 2024 (Table 8.1) also shows a clear need for 4 bedroom market and affordable family homes. Whilst the existing housing stock across the District includes a larger proportion of larger family homes, the evidence also points to a large number of underoccupied homes as a result of an ageing population and elderly residents not wishing to downsize.
- 6.4. The use of the phrase 'disproportionate' in the penultimate paragraph, when describing the quantum of 4+ bedroom houses, lacks the precision and clarity needed for a Plan policy. The policy should recognise that needs and demand will vary from area to area and site to site and identify that its requirements could be subject to a viability assessment, thus allowing for flexibility in its application.
- 6.5. Clarification should also be made in defining 'major' development. It is noted that the Publication Plan has removed footnote 11 from the Issues and Options Plan which defined major development in accordance with the NPPF definition stating major development is "development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more". Whilst a definition is contained within the NPPF, the statutory definition is actually contained within the Town and Country Planning Development Management Procedure Order (DMPO), which defines major development as where:

*(Ci) the number of dwellinghouses to be provided is 10 or more; or*

*(Cii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i)*

- 6.6. The text emphasised above is an important qualifier when considering whether or not a proposal constitutes major development. This qualifying text has not been carried through into the definition contained within the NPPF. Taylor Wimpey suggest a definition of major development should be reintroduced into the Plan, with the DMPO definition referred to for the avoidance of doubt.
- 6.7. In light of the above, the policy is considered unsound, as it is neither justified nor consistent with national policy for the reasons set out above.

### **Policy HC2 – Housing Density**

- 6.8. The flexibility afforded to housing density and the recognition that although a minimum of 35dph across the wider site should be delivered, the density of development within a scheme may vary to take account of local character impacts and the provision of services and facilities across a development, is welcomed.
- 6.9. Whilst achieving an overall net density of 35dph across larger strategic sites may be achievable, including various character areas across a more extensive development site, this could prove more difficult across other allocation sites, and conflict with other policy provisions across the Plan, particularly having regard to the District's rural character.
- 6.10. The provisions of Policy HC10 (Design Requirements) whilst setting out that developments should use land efficiently also requires existing landscape and settlement character to be respected as well as requiring a variety of green infrastructure to be incorporated among other design requirements. Policy HC17 also requires a landscape led approach to provide a hierarchy of open spaces throughout development layouts, whilst Policy NB4 on Landscape Character, requires the intrinsic rural character and local distinctiveness of South Staffordshire landscape to be maintained and where possible enhanced. This, along with other policy and technical considerations across a development including delivery of SuDs, 10% BNG, NDSS and M4(2)/M4(3) compliant homes places increased pressure on sites and the ability to achieve higher densities without compromising landscape character and the amenities of existing residential areas.

### **Policy HC3 – Affordable Housing**

- 6.11. Policy HC3 requires proposal for major residential development to provide 30% of all dwellings as affordable housing. The use of the term 'major residential development' in this context requires a definition to save confusion as to what size of development affordable housing becomes a requirement, it is presumed to be the same as that within the NPPF Glossary.
- 6.12. The requirement for 30% affordable housing appears to be supported by the Viability Study Stage 2 Report 2022 (VA) which confirms at paragraph 3.2.7 that the proposed affordable housing figure can be appropriate for South Staffordshire, but it does highlight the challenges in delivering such a requirement and the need for higher site values to be achieved to deliver this across the board.
- 6.13. The NPPF is clear that the derivation of affordable housing policies should take account not only of need but also have regard to viability and deliverability and a differentiated policy approach should be used to the provision of affordable housing, as set out in the Viability Study.
- 6.14. The Council's position to continue with the established approach of using Section 106 planning obligations to secure the necessary infrastructure to support and mitigate the effects of new development is supported.
- 6.15. The requirement to 'pepper pot' affordable housing in clusters across the development is generally supported. However, the policy should recognise that for management purposes, Registered Providers do require a degree of clustering of affordable housing within a development and this will inform site layouts.
- 6.16. The frequent reference to further guidance being provided by the Affordable Housing SPD is noted. The SPD should do no more than clarify the Local Plan policy and it is suggested that if the requirements for implementing the policy are known to need explanation now then these should either be included within the Plan now or set out within the explanatory text. The SPD is not the appropriate approach for setting new policy and or burdens on delivery, and the Plan should provide clarity at the point of adoption as to what it requires.

#### **Policy HC4 – Homes for older people and others with special housing requirements**

- 6.17. Policy HC4 notes major development should clearly contribute to meeting the needs of older and disabled people.
- 6.18. The above policy wording does not define 'older people', so it is unclear as to exactly who this Policy is targeting or who would be eligible to occupy such dwellings.
- 6.19. It stipulates that all major development should provide bungalows, age restricted single storey accommodation, sheltered/retirement living and extra care housing.
- 6.20. Such specialist housing, especially that related to extra care and retirement living, often needs a minimum critical mass to be viable (for example, extra care units typically require 60+ bedrooms to be viable). Taking the allocated site as an example, proposed for a minimum of 82 dwellings, this is simply not at a size or scale which could support all these forms of specialist housing.
- 6.21. The policy needs to provide much greater clarity on when such housing will be required as part of a major development. This was raised in representations to the previous round of consultation to the 2022 Publication Plan, however, continues to remain unchanged within the Publication Plan 2024 policy wording.
- 6.22. Despite concerns raised as part of the last round of consultation, it is also noted that the plan continues to require 100% of all housing to be M4(2) compliant following on from the 30% of all homes to be Building Regulation M4(2) compliant proposed under the Preferred Options consultation Plan. This brings with it issues of affordability, in a context where the accessibility and affordability of housing is an area of wider concern. Whilst the principle of provision of a percentage of M4(2) accessible housing is supported, it is not a requirement of the whole population to have such provision. The ability to deliver all homes to M4(2) standards will inevitably severely impact viability and on the overall capacity of sites to deliver new homes.
- 6.23. The Council's Viability Study, Stage 2 (2022) acknowledges that at present Part M of the Building Regulations requires all dwellings to be built to a minimum of M4(1) with further enhanced requirements to M4(2) and M4(3) required through policy, subject to evidence of need as well as viability.

- 6.24. Currently, the requirement for M4(2) properties is optional within Building Regulations and are described as making "*reasonable provision for most people to access the dwelling and incorporate features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users*". It is recognised that the older person population is likely to increase over the plan period, however an ageing population affects the whole country and is not an issue specific to South Staffordshire. If the Government had intended that evidence of an ageing population alone justify adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case.
- 6.25. Furthermore, the HMA identifies a need for 1,783 accessible and adaptable general homes for those over 65 years and 1,235 for those under 65 years, across the Plan Period. This equates to less than 30% of the overall housing requirement to be delivered by this Plan. The updated SHMA 2022 at paragraph 8.14 concludes that it is calculated that adapted housing M4(2) will be required for 3,978 households by 2040 in South Staffordshire. It is therefore not clear how the 100% requirement within the Policy has been arrived at or how this is justified.
- 6.26. Having highlighted the above, it is also noted that the Council's Viability Study 2022 simply refers to a Government consultation which indicates that M4(2) standards may become mandatory for all new housing.
- 6.27. That consultation was undertaken in 2020 and in July 2022 the Government published their response. This indicates that M4(2) dwellings may indeed become mandatory. This will necessitate a change to Building Regulations and statutory guidance, on which the Government will consult further in due course.
- 6.28. At the present time, the requirement for M4(2) dwellings is not mandatory and if the Council wish to pursue a policy requirement of 100% M4(2) dwellings then this needs to be justified, with reference to both need and cost. As drafted, Policy HC4 is not sound as it is not justified.

#### **Policy HC8 – Self-build and Custom Housebuilding**

- 6.29. Policy HC8 requires sites for major residential development to "*... have regard to the need on the council's self-build register and make provision of self and custom build plots to reflect this*". The policy should be clear that in having regard to the Council's self-build register, it is only part 1 of the register which needs to be considered. The policy should also recognise,



that delivery of self-build housing on new residential sites, successfully occurs when there is a distinct phasing or grouping of plots, secured for such delivery.

6.30. Whilst Taylor Wimpey generally supports the concept of self-build/custom housing, they do not consider providing them as part of a larger housing development is the most appropriate solution because self/custom builders are more likely to want a more bespoke location/setting. Smaller dedicated self/custom sites are therefore a more appropriate answer.

6.31. Taylor Wimpey supports the position that should a proposed custom self-build plot not be sold after 12 months following active marketing, then the developer will be permitted to build out the plan as a standard property type.

#### **Policy HC10 – Design Requirements**

6.32. The introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance is supported. However, specific comments are made on the policy as drafted:

- The provision of tree lined streets (item c) should be subject to highway authority agreement, and where appropriate, their adoption. In Taylor Wimpey's experience, local highway authorities do not want trees in immediate proximity of the street due to management concerns or liabilities.
- The point on house types and tenures (item l) is a repetition of policy material set out at Policy HC1 and is therefore unnecessary.

6.33. The Policy should be amended to remove the repetition and ensure that Staffordshire County Highways have been consulted on the proposed draft policy in detail.

#### **Policy HC12 – Space around dwellings and internal space**

6.34. The continuity of existing external space and dwelling standards is generally supported although there should be a recognition that certain house types, for example Part M4(2) dwellings, should have smaller, more manageable gardens.

6.35. Taylor Wimpey suggests that some flexibility must be allowed in the application of the Nationally Described Space Standards (NDSS) as occasionally non-compliance with NDSS

may be appropriate for sound urban design reasons and the Policy should therefore build in some flexibility.

- 6.36. The policy is considered unsound as drafted, as it is neither justified nor consistent with national policy for the reasons set out above.

#### **Policy HC14 – Health Infrastructure**

- 6.37. Further to the previous round of consultation on the Publication Plan 2022 version, the policy continues to refer to proposed development causing '*unacceptable impact*' on existing healthcare facilities but fails to define what level of impact is deemed unacceptable or how that is to be measured. The policy should acknowledge that not all residents of a development will be new to a catchment area and may indeed already be registered by the local health care provider, thereby not creating a net additional burden.

- 6.38. Careful analysis is required therefore with regard to the capacity of existing infrastructure to accommodate new patients, before reaching a conclusion as to what any CIL Regulation 122 compliant financial request might be. The requirement for CIL Regulation compliance of any request should be clearly specified within policy.

- 6.39. The policy as drafted is considered unsound without amendment, as it is neither justified nor consistent with national policy for the reasons set out above.

#### **Policy HC15 – Education**

- 6.40. Taylor Wimpey broadly supports the policies' objective for the improvement or construction of schools to meet the demand generated by children in new development. However, as currently written, the policy makes a blanket assumption that new education infrastructure will be required from all new development.

- 6.41. The Policy text as currently drafted requires further clarification to ensure that any such provision to be delivered via a S106 agreement has regard to the tests of CIL Regulations 122. The policy should make this explicit. In this regard, the policy should also recognise new infrastructure will be required from new development, only where it can be demonstrated that existing capacity to accommodate growth does not currently exist.

- 6.42. Policy HC15 is considered unsound, as it is neither justified nor consistent with national policy for the reasons set out above.

### **Policy HC17– Open Space**

- 6.43. Whilst there is no in principle objection to the requirements of the policy or the provision of open space within developments, some clarifications are required in order to ensure that the Policy is sound.
- 6.44. The policy requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site, for example where there is already high-quality equipped play provision in the locality it would not make sense to duplicate this provision. In addition, it is not appropriate to require open space to be centrally located on all sites as this does not take into consideration differences in development sites opportunities and constraints. It is requested that the Council amend the policy to allow policy a more flexible approach to achieve the right design solution for each site.
- 6.45. The focus of Green Infrastructure provision should be based on quality rather than quantity or 'useability' and the exclusion of small incidental green infrastructure (GI) without a clear recreational purpose from on-site open space provision is not supported. The policy text cites landscape buffers as an example of incidental GI which may be excluded. This is not appropriate as landscape buffers can be of a significant size and could clearly contribute towards open space provision on a site. They should therefore be included in these calculations where they are accessible. Planning Practice Guidance acknowledges that *"Green infrastructure can embrace a range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals, and other water bodies"* (Paragraph 004 – ref ID: 8-004-20190721).
- 6.46. The policy should therefore be revisited and clarified, with clear reference to national guidance to ensure that open space and green infrastructure is properly and clearly defined and to recognise the contribution that a range of spaces and uses will bring to a development.
- 6.47. The policy as drafted is unsound as it is inconsistent with national policy and is unjustified for the reasons set out above.

### **Policy HC18 – Sports Facilities and Playing Pitches**

- 6.48. Policy HC18 sets out that all new major developments will make a contribution towards sports facilities and playing pitches. Although the policy continues that this will be “*secured through a S106 agreement and informed by the latest Sport Facilities and Playing Pitch Strategies*”, *the emphasis* should first be on establishing deficiencies in existing sports and playing pitch provision (in accordance with the latest evidence) and a requirement for any additional provision alongside the proposed development having regard to the tests of CIL Regulation 122, rather than making a blanket assumption that all major developments will be required to make a contribution towards sports facilities and playing pitches.
- 6.49. The wording of the policy as currently drafted should therefore be revisited to ensure this is made explicit. Regard will need to be given not only to evidence of provision included within the latest Sport Facilities and Playing Pitch Strategies but also have regard to the delivery of new facilities as part of the larger strategic allocations.
- 6.50. It is noted that further guidance on the procedure for determining provision required from new development will be set out in an Open Space, Sport, and Recreation SPD. However, the policy requires all new major residential development to contribute towards sports facilities and playing pitches, but no further quantitative details are provided to set out the detail of what will be expected within the Publication Plan.
- 6.51. The requirements of delivering sports facilities and playing pitches through on-site provision or S106 contributions is only one element of the package that sites will need to provide, and the Council must ensure the delivery of all potential obligations are taken into account for both on and off-site provision to support the soundness of the Plan at examination.

### **Policy EC3– Inclusive Growth**

- 6.52. The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential dwellings is not supported. Whilst the benefits of such plans are acknowledged, it is considered more appropriate to implement them on a site-by-site basis, dependent on local circumstances and the labour market and such a requirement can be sourced by condition. This is especially important in the context of modular methods of

construction inevitably increasing in the coming years, probably sourced from outside South Staffordshire.

- 6.53. If the Policy is to be found sound it should be amended to incorporate flexibility and allow for Employment and Skills Plans to be requested on a site-by-site basis, where appropriate. In so doing the relevant criterion for requesting such policies must be clearly defined and set out within the policy in order to ensure the policy is justified.

#### **Policy EC11 – Infrastructure**

- 6.54. We note that the policy commits the Council to work with and support infrastructure providers and also offers policy support for this. Any assessment of cumulative impact and mitigation requested must be proportionate and CIL Regulation 122 compliant. The policy should be explicit that this is the case.
- 6.55. The policy is considered unsound, as it is neither justified nor consistent with national policy for the reasons set out above.

#### **Policy EC12 – Sustainable Transport**

- 6.56. The Policy sets out a number of criteria that all new developments will be required to follow. Point b) requires 'safe access and an acceptable degree of impact on the local highway network' to be demonstrated. The wording of the policy should however be revisited to ensure consistency with the NPPF Paragraph 115 which sets out that "*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*".
- 6.57. As currently written the wording of point e) is unclear and lacks clarity in the context of the policy which relates to transport and the delivery of sustainable travel and is currently open to interpretation. In particular it is unclear why a policy relating to sustainable transport is seeking to minimise the impact of noise. The policy should focus on transport related elements. A more appropriate form of wording is therefore suggested as follows:

*"Where required, appropriate mitigation to address the impacts of any increased traffic (including cumulative impacts) associated with the proposed development shall be provided, either through direct improvements or Section 106 contributions where proportionate and CIL Regulation 122 compliant"*.



6.58. As currently written the policy is therefore considered unsound as it is not consistent with national policy for the reasons set out above.

**Policy NB1 – Protecting, enhancing and expanding natural assets**

6.59. The policy sets out that *“The developer must demonstrate through submission of documents that where a protected species mitigation licence is required from Natural England, that Natural England would be reasonably likely to grant this, and that the three tests under Regulation 55 sub-paragraphs (2)(e-g), and (9)(a-b) of the Conservation of Habitats and Species Regulations 2017 (as amended) would be met”*.

6.60. Whilst important that consideration is given to the potential requirement for a species mitigation licence, this should be identified within the supporting policy text or the Natural Environment and Biodiversity SPD for information purposes only rather than under the provisions of planning policy. The requirement should therefore be deleted from Policy NB1.

6.61. The provisions of the policy, as currently written are reliant upon Natural England responding on a development in advance of a formal application being submitted which is considered to be onerous and unnecessary. It is likely that the details of the layout and associated mitigation may well evolve through the planning application process. Where appropriate, Natural England will have the opportunity to comment on a proposed development through the statutory application consultation process, whilst developers have the opportunity to seek advice in relation to the licence simultaneously alongside the planning application. To require this input ‘upfront’, has the potential to unnecessarily delay the submission of applications and in turn planning permissions.

6.62. The policy is considered unsound, as it is neither justified nor consistent with national policy for the reasons set out above.

**Policy NB2 – Biodiversity**

6.63. Taylor Wimpey are supportive of the need to address net losses to Biodiversity, through the provision of enhancement to deliver and overall net gain. The Council’s policy requirement to deliver 10% Biodiversity Net Gain, reflects that of the Environment Act and is not objected to. However, given the 10% BNG is a mandatory requirement for all developments (subject to some exemptions) the detailed provisions included in Policy NB2 in relation to BNG are

considered unnecessary and a duplication of national policy requirements (Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021)).

- 6.64. The Policy should therefore be simplified with clauses a)–c) deleted so as to avoid the potential for misinterpretation within the wording of the policy and confusion when read alongside the requirements of the Act and any associated guidance. The Natural Environment and Biodiversity SPD provides the opportunity to expand upon the requirements of BNG at a national level were considered necessary and of assistance to the reader at a local level.

#### **Policy NB4- Landscape Character**

- 6.65. Policy NB4, would benefit to an amendment in the text, which reflects the comments made on Policy NB2 above. As drafted, the second paragraph states:

*"All trees, woodland, and hedgerows should be protected and retained"*

- 6.66. Whilst it is appreciated that the following sentence identified that should a loss be required, appropriate mitigation measure must be delivered by the developer, the above sentence should be amended to the following:

*"All trees, woodland and hedgerows should be protected and retained wherever possible."*

#### **Policy NB6A: Net zero new build residential development (operational energy) Sustainable Construction**

- 6.67. NB6A requires all new residential developments to achieve net zero regulated and unregulated carbon emissions through the application of a number of requirements.

- 6.68. Although a move towards delivering greater energy efficiency is supported, it is important that the Development Plan's response to climate change is realistic and consistent with national legislation and policy provisions, setting standards within a timetable which is collectively understood and deliverable across the development industry.

- 6.69. Energy efficiency and the need to make significant improvements towards the pathway to net zero has been addressed at a national level through increasingly stringent Building Regulation requirements. In addition, from 2025 the Future Homes Standard will also require new homes to produce at least 75% lower CO2 emissions than current energy efficiency

requirements. The recent Ministerial Statement on Local Energy Efficiency Standards dated 13th December 2023 was clear that Local Plans should not be placing onerous requirements on developers which exceed the requirements of national Building Regulations setting out that *“Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures that development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework ...”*

6.70. It is noted that the Council have not undertaken an updated viability study to support the 2024 Publication Plan with both the Sustainable Construction Policy NB6 Task A Report (2023) and Sustainable Construction Policy NB6 – Addendum Report (2024) postdating the most up to date Viability Report 2022. The Addendum Report sets out that the 63% reduction on the Part L 2021 TER (regulated carbon emissions) was the most carbon effective option that remained within the 7% cost uplift that the viability had previously tested. There is the risk however of making various assumptions here without rigorously testing against the specifics of the revised policy and the potential cost implications for proposed developments and whilst the policy incorporates the ability to demonstrate a site specific viability case a thorough and up to date assessment should be undertaken to assess the implications of Policy NB6A alongside the other policy requirements set out in the 2024 Publication Plan. As there is no evidence on viability the policy conflicts with government advice and should therefore be deleted.

6.71. Concern is identified in relation to some of the technical detail included at Policy NB6A Clause A7 in relation to post occupancy evaluation with the policy stating that;

*“Large-scale development (over 50 homes) should monitor and report total energy use and renewable energy generation values on an annual basis for 5 years from first occupation. An outline plan for the implementation of this should be submitted with the application. Monitored data are to be reported to the local planning authority.”*

6.72. Once sold the properties will be owned by the purchasers and their mortgagees. There are issues of data protection and consent surrounding the recording and sharing of data by Taylor Wimpey with a third party, in respect of properties that they will not own.



- 6.73. Secondly, a question arises as to the purpose of such widespread collation of such data. It will not be possible to post factum make alterations to the constructed buildings, so what is the benefit or purpose of such a significant amount of data collation? If the purpose is to inform and advise as to future construction methods, then this could be equally achieved by an informed and targeted research exercise by organisations such as the BRE in advising Government and through amendments to building regulations. Extracting, what is in effect lifestyle data, from private individuals, is neither considered desirable nor practical in this regard.
- 6.74. There is no evidence to suggest that the Council have considered or addressed the GDPR implications of this requirement, its effect on 'mortgage-ability', or indeed its effect on sales values. Presumably properties which are wired to share private individual's lifestyle data, would be less attractive in the market place, and that would be reflected in reduced sales values. This element of the policy is not practical to be delivered in the form proposed, and is therefore considered unsound, on the grounds of being neither justified nor consistent with national policy for the reasons set out above.

**Policy NB6C: Embodied carbon and waste**

- 6.75. Taylor Wimpey fully appreciate the value of Whole Life-Cycle Carbon assessments and the need for some post construction, pre-occupation assessment. Whilst it is noted that the requirements in relation to embodied carbon have been revisited since the earlier 2022 iteration of the Publication Plan document, which now 'encourages' (at Clause C1) rather than requires all new residential development to complete a whole life carbon assessment there remains concern over the inclusion of the policy, in particular when read alongside paragraph 13.15 which sets out that the submission of information will be required at the post-completion stage via condition '*to verify that as built embodied carbon quantities remain compliant*'.
- 6.76. Similarly to representations made in relation to provisions under Policy NB6A, Policy NB6C Clause C2 is also considered unnecessary with Building Regulations instead providing the basis on which the construction of buildings should adhere to. There should be no expectation placed on housebuilders and builders to exceed national standards which have already been through vigorous viability testing and provide certainty for both housebuilders and developers.

- 6.77. Clause 3 in relation to *'easy material re-use and disassembly'* and *'end of life demolition'* is ambiguous and lacks clarity, placing reliance on further detail within an SPD. The SPD should do no more than clarify the Local Plan policy, and it is suggested that if the requirements for implementing the policy require explanation now, then these should either be included within the Plan Policy or set out within the explanatory text.
- 6.78. Similarly to Policy to NB6A, with regards to monitoring and the provision of data post completion/occupation required under Clause C4, raises a number of concerns and is not considered practical in the form proposed nor is it considered necessary given requirements under Building Regulations already provide the necessary basis in ensuring homes are constructed in accordance with specific efficiency standards. In terms of the introduction of a planning condition requiring verification of embodied carbon quantities, this would not be considered to meet with the 6 tests for planning conditions as stipulated within the NPPF Paragraph 56.
- 6.79. The requirement for an Energy Statement to accompany applications is referenced only within the supporting text at Paragraph 13.15. To ensure clarity to the reader reference to the provision of an Energy Statement if deemed necessary to deliver the requirements of Policy NB6C should be explicitly set out within the Policy itself rather than an afterthought. The purpose of an Energy Statement at the planning stages is however questioned given the requirements under Building Regulations to meet specific standards of construction in relation to energy efficiency with housebuilders housing portfolios designed to address these requirements.
- 6.80. As currently written the policy is not considered to be adequately justified or consistent with national policy for the reasons set out above.



## 7. Conclusion

- 7.1. This representation is made by Pegasus Group on behalf of Taylor Wimpey to the South Staffordshire Local Plan Publication Plan (Regulation 19) consultation. The representation relates to their promotion for residential development of the draft allocation 285 site at Pool House Road, Wombourne.
- 7.2. Taylor Wimpey is supportive of the Local Plan overall, including the decision to include land at Pool House Road as an allocation, which will deliver much needed homes to meet the needs of the District and the wider HMA.sasars
- 7.3. The proposed housing allocation at Pool House Road provides the opportunity to deliver a residential scheme for at least 82 dwellings, 30% of which are to be affordable. The site also seeks to deliver a range of dwellings sizes and provision of bungalows as discussed within the most recent pre-application, which took place in April 2024. Furthermore, on site public open space will be designed into the site which supports biodiversity and active travel.
- 7.4. The information contained within this representation, demonstrates that the Site is a suitable and deliverable site for residential development, subject to its allocation.
- 7.5. Taylor Wimpey would wish to be represented at any Hearing session covering the proposed allocation.



# APPENDIX 1

Site Location Plan



# Expertly Done.

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



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