

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

**South Staffordshire Council
Local Plan 2023 - 2041**

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 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

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Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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2. Agent's Details (if applicable)

Title	<input type="text"/>	Mr
First Name	<input type="text"/>	Jon
Last Name	<input type="text"/>	Kirby
Job Title (where relevant)	<input type="text"/>	Senior Director
Organisation (where relevant)	Lichfields c/o Taylor Wimpey	Lichfields
Address Line 1	<input type="text"/>	Cornerblock
Line 2	<input type="text"/>	2 Cornwall Street
Line 3	<input type="text"/>	Birmingham
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	B3 2DX
Telephone Number	<input type="text"/>	0121 713 1530
E-mail Address (where relevant)	<input type="text"/>	jon.kirby@lichfields.uk



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**South Staffordshire Publication
Plan (Pre-Submission) 2024**
**Representations on behalf of
Taylor Wimpey**

Land at Clent View Road, Stourbridge

Taylor Wimpey Strategic Land (West Midlands)

29 May 2024

LICHFIELDS

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for over 60 years.

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32162134v2

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Appendices

Appendix 1 Vision Document

1.0 **Introduction**

1.1 These representations to the South Staffordshire Publication Plan 2024 (“the PP 2024”) consultation have been prepared by Lichfields on behalf of Taylor Wimpey.

1.2 We focus on the strategic matters that are contained within the PP 2024 consultation document and relate specifically to Taylor Wimpey’s land interest at Land at Clent View Road, Stourbridge (“the site”).

1.3 The site is located within the Green Belt and was assessed as a potential option for residential development within the 2019 Green Belt Study (GBS) and the subsequent addendum (2022), Site reference 683. Furthermore, the site has been assessed within the 2021, 2022 and 2023 SHELAAs as well as the 2022 and 2024 Housing Site Selection Topic Paper.

1.4 Taylor Wimpey seeks to work constructively with South Staffordshire Council (“the Council”) as it progresses towards the adoption of the Local Plan Review [LPR] and trusts that the comments contained within this document will assist Officers in this regard.

Plan-Making to Date

1.5 The Council has previously consulted on an ‘Issues and Options Consultation’ (“IOC”) between 8 October and 30 November 2018, followed by the South Staffordshire Spatial Housing Strategy & Infrastructure Delivery (“the SHSID”) and the Infrastructure Delivery Plan 2019 [IDP] between 17 October until 12 December 2019. These were followed by a Preferred Options [PO] consultation from November to December 2021 and a Publication Plan [PP 2022] consultation between 11 November and 23 December 2022.

1.6 The Council is now undertaking a consultation on the PP 2024, following changes to the National Planning Policy Framework (2023) [NPPF] in December 2023. The consultation asks for views on the legal soundness of the Council’s PP 2024 and the policies within it.

Structure

1.7 These representations are structured around the Vision and policies set out in the 2024 PP consultation, these being:

- Policy DS4: Development Needs;
- Policy DS5 – The Spatial Strategy to 2041;
- Policy SA5 – Housing Allocations
- Policy HC1 – Housing Mix;
- Policy HC4 – Homes for Older People;

2.0 Areas of Response

- 2.1 Taylor Wimpey's response to the PP 2024 is set out below, using the draft policies contained within the PP 2024 document for continuity.

Policy DS4 (Development Needs)

- 2.2 Policy DS4 (Development Needs) sets out South Staffordshire's housing requirement for the period 2023-2041. This includes a small contribution towards the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area [GBBCHMA]. Taylor Wimpey has the following comments on Policy DS4.

Housing Need

- 2.3 Policy DS4 states that South Staffordshire will deliver at least 4,726 dwellings over the period 2023-2041. This is to meet the districts local housing need [LHN] figure of 4,086 dwellings (227 dwellings per annum) and to make a contribution of 640 dwellings towards the unmet housing needs of the GBBCHMA. Paragraph 5.8 of the PP 2024 outlines that the Council have calculated the LHN figure using the NPPF's Standard Method [SM].
- 2.4 Taylor Wimpey considers that the Councils approach to calculating its minimum LHN figure is broadly correct, and notes that it is underpinned by the South Staffordshire Housing Market Assessment Partial Update (2024) ("the SHMA Update"). The SHMA Update has correctly utilised the 2014-based household projections and 2022 median work-place-based affordability ratios to calculate the LHN figure. This accords with the guidance set out within the Planning Practice Guidance [PPG].¹ Taylor Wimpey also welcomes that the Council has updated the LHN figure since the PP 2022 (c.241 dpa), reflecting the PPG's guidance to keep this figure under review.²
- 2.5 Notwithstanding the above, Taylor Wimpey would like to highlight to the Council that the LHN figure produced by the SM is a minimum starting point.³ The PPG is clear that the actual housing need for an area can be higher where there is justification relating to issues such as infrastructure, employment or unmet housing needs.⁴ The PPG is also clear that:
- "...An increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes."* (PPG ID: 67-008)
- 2.6 Taylor Wimpey believes that the SHMA Update, and the PP 2024 have not sufficiently considered whether an uplift to the minimum LHN figure is required. This is contrary to the guidance set out within the PPG.
- 2.7 In this context, the Council should consider whether an uplift to the LHN figure is required to address affordable housing needs. This could be required to account for the affordable housing needs of in-migrating households from Birmingham or the Black Country, resulting from the planned contribution of 640 dwellings towards meeting unmet housing

¹ PPG ID: 2a-004

² PPG ID: 2a-008

³ Paragraph 61

⁴ PPG ID: 2a-010

needs. The Council should consider whether an uplift would enable the delivery of the required number of affordable homes for different community groups (Para 63, NPPF).

- 2.8 Additionally, the South Staffordshire Economic Development Needs Assessment Update (2024) sets out that the district has a low self-containment of resident and workplace-based flows (i.e. there are fewer resident workers than people who commute into the district for work) and as a result, an uplift in housing supply to align with job growth is not needed (Para 7.44).
- 2.9 However, Taylor Wimpey considers that this does not accord with the requirements of the NPPF. Paragraph 86 of the NPPF recognises that there is an implicit link between housing need and economic growth, and that economic growth and housing growth should not be decoupled from one another. Essentially, the Councils proposed approach does not promote sustainable patterns of commuting. The Council has not sufficiently addressed whether there would be an adequate supply of dwellings to meet identified indigenous employment needs as well as regional needs (arising from job growth connected with the West Midlands Interchange [WMI]).
- 2.10 In this context, Taylor Wimpey would encourage the Council to produce a Topic Paper or update to the SHMA which addresses whether an uplift to the minimum LHN figure should be applied.

Unmet Housing Needs

- 2.11 Taylor Wimpey welcomes that the Council has committed to helping address the unmet needs of the GBBCHMA, in the context of the severe housing shortages which exist within the main conurbations of the Housing Market Area [HMA]. Even in the context of the revised NPPF, it remains appropriate and in accordance with paragraphs 11b and 35c of the NPPF, that the Council makes provision for cross-boundary needs within the PP 2024.
- 2.12 Notwithstanding this, Taylor Wimpey is concerned that the Council's contribution has reduced to 640 dwellings from c. 4,000 dwellings over the plan period. The PP 2024 suggests that this reduction is justified as the revised NPPF allows Local Authorities to choose whether or not to remove land from the Green Belt in order to meet their own housing needs and the unmet needs of neighbouring authorities. The PP 2024 also reasons that the Strategic Growth Study (2018) [SGS] (which formed the basis for the previous 4,000 home contribution) is no longer up to date (Para 5.12).
- 2.13 In light of the above, the Council has explored alternative spatial strategy options and has pursued a strategy which encompasses a capacity-led approach which focuses growth at sustainable non-Green Belt sites, with limited Green Belt development in Tier 1 settlements which are served by public transport (Para 5.14). As a result, the PP 2024 omits a number of previously allocated sites and the Council's contribution towards the GBBCHMA has reduced from c.4,000 dwellings to 640 dwellings. In this context, Taylor Wimpey wishes to raise some concerns regarding the soundness of the Councils approach to addressing the unmet needs of the GBBCHMA.
- 2.14 The Council has suggested (although not explicitly) that there is not sufficient evidence regarding the quantum of unmet needs and this uncertainty provides adequate justification to defer this issue to a future LPR. Taylor Wimpey consider that this is fundamentally incorrect.

- 2.15 The Council has recognised that updated evidence is being prepared by the West Midlands Development Needs Group (Para 5.12) to quantify the housing market shortfalls and consider potential growth locations. However, Taylor Wimpey would like to highlight that Lichfields has produced more up-to-date evidence regarding how to sustainably distribute this need. Notably, the Lichfields' Black Country's Next Top Model analysis was previously considered by the Council through Residential Growth Option (F) of the 'Sustainability Appraisal of the South Staffordshire Local Plan Review (2019-2039): Regulation 19 SA Report (October 2022)' ("the SA 2022"). Taylor Wimpey is concerned that this evidence now seems to have been overlooked, as it supplies the Council with an up-to-date assessment which could underpin the LPR.
- 2.16 Whilst the Black Country Authorities [BCAs] Black Country Plan Review [BCPR] is no longer moving forward, it is still critical that the acute unmet housing needs of the Black Country are addressed. Each BCA authority will now need separate assistance to achieve this. In this regard, it should be noted that following the Stage 1 Hearings of the Examination in Public of the Shropshire Local Plan, Interim Findings were issued by the Inspector which (amongst other things) considered Shropshire's planned contribution to the unmet needs of the BCAs (c.1,500 dwellings). The Inspector noted that despite the "*new plan making context, there is no reason before us to find that the identified unmet needs in the Black Country area will disappear*" (Para 14). They also stated that "*it remains an important strategic cross boundary matter that should not be deferred*" (emphasis added) (Para 15).
- 2.17 Importantly, a review of the separate and emerging BCA LPRs indicates that there has been a reduction in the supplies of the BCA's. This indicates that the unmet housing need has grown from c.28,000 (as stated within the BCPR) to c. 37,000 dwellings. Furthermore, Birmingham City Council's recent Issues and Options consultation identified an emerging unmet need of approximately 78,000 dwellings for the period 2022-2042 (Para 5.13). The unmet needs of the GBBCHMA are therefore demonstrably acute.
- 2.18 Taylor Wimpey notes that the Council recognises that it is likely that the shortfalls within the GBBCHMA are increasing (para 5.10). However, whilst South Staffordshire is proposing to make a nominal contribution towards the BCAs, there is no proposal to help meet the unmet needs of Birmingham. Furthermore, Taylor Wimpey considers that the planned contribution towards the BCA's (c.640 dwellings) is insufficient in the context of the severeness of the unmet needs.
- 2.19 Taylor Wimpey notes that the Council has instead committed to working with the GBBCHMA authorities to provide an update to the SGS and to considering the results through a future LPR (Para 5.12). However, Taylor Wimpey considers that this approach defers the problem, rather than effectively dealing with the issue. This is not in accordance with the aims of paragraph 35c of the NPPF. It is clear that the scale of the GBBCHMA's unmet needs is acute, however the Council have only proposed a minor contribution of c.640 dwellings. This approach has been underpinned by a revised spatial strategy which conflicts with the Council's previous conclusions regarding sustainable development over the period leading up to 2041 (i.e. omitting several sustainable Green Belt sites).
- 2.20 In this context, Taylor Wimpey is concerned that the Council is planning to defer dealing with this issue until the SGS has been updated. An update to the SGS could take many years and there is no guarantee that an agreement would be reached in respect of spatial

distribution. Taylor Wimpey notes that only several authorities agreed to the distribution of growth which was outlined within the 2018 SGS.

- 2.21 Regardless of whether Birmingham or the BCAs release further land within their own Green Belts, the scale of the GBBCHMAs unmet housing needs (arising up to 2041) will likely remain severe. Taylor Wimpey accepts that in LPA's where the 35% urban centres uplift is applicable (Wolverhampton and Birmingham), the NPPF (Para 62) requires that these needs should be met within their own areas wherever possible. However, it remains vital that South Staffordshire makes a sufficient contribution towards helping to address these unmet housing needs. This is because the scale of the unmet needs is so severe that the GBBCHMA authorities will find it difficult to meet them in full without conflicting with the other policies within the NPPF (Para 62).
- 2.22 Furthermore, Taylor Wimpey considers that the GBBCHMA unmet housing needs should be addressed immediately, rather than being deferred to future LPR's or an update to the SGS. In this regard, Taylor Wimpey would encourage the Council to utilise a functional relationship-based approach, which would result in a contribution of c.8,650 dwellings.⁵ However, whilst this could be sustainably accommodated within South Staffordshire, in the context that the SA 2022 found that a c.4,000 dwelling contribution represented the most sustainable Residential Growth Option, Taylor Wimpey consider that South Staffordshire should make a minimum contribution of c.4,000 dwellings.
- 2.23 Taylor Wimpey would also like to highlight that the updated NPPF does not prevent an LPA from releasing Green Belt land, where the sequential approach has been satisfied in respect of utilising its supply of brownfield land, optimising densities, and engaging with neighbouring authorities to help meet identified needs. The release of Green Belt Land to address the unmet needs of the GBBCHMA is therefore entirely consistent with the revised NPPF.
- 2.24 To summarise, Taylor Wimpey would encourage the Council not to defer addressing the unmet needs of the GBBCHMA to a later date. The PP 2024 only proposes to make a 1.7% contribution towards the unmet housing needs of the BCAs. Across the entire GBBCHMA, this represents only a c.0.6% contribution. In this context, Taylor Wimpey considers that the Councils current approach towards both its own housing requirement and the GBBCHMAs unmet housing needs is unsound. A greater quantum of growth is needed within South Staffordshire to address these needs. Taylor Wimpey is confident that there are sufficient opportunities within the district where housing growth could be sustainably located. These sites could make a valuable contribution towards meeting the unmet needs of the GBBCHMA. Taylor Wimpey would like to highlight that the land at Clent View Road (site ref: 683) represents one of these opportunities.

Buffer

- 2.25 Taylor Wimpey considers that it is vital that the Council's housing trajectory contains sufficient land supply over the plan period to ensure that it can adjust to unforeseen circumstances. This is important as if any component of the identified supply falls behind

⁵ Per Lichfields' Black Country's Next Top Model and endorsed by Inspectors both the Coventry and Warwickshire HMA and the Leicester and Leicestershire HMA

the timescales envisaged by the Council or fails to come forward at all, this may lead to the GBBCHMA's unmet housing needs failing to be delivered.

- 2.26 The PP 2024 sets out that, over the plan period, the Council will make provision for c. 4,726 dwellings against the Council's housing requirement of 4,086 dwellings plus a 640-dwelling contribution towards the GBBCHMA. Draft Policy DS4 suggests that this would represent an oversupply of c.10%, which is considered by the Council to enable "*the plan to meet the national policy requirement to respond to changing circumstances in the plan period and demonstrate plan flexibility*" (Para 5.23).
- 2.27 Notwithstanding the concerns raised above in respect of the Council's draft housing requirement, Taylor Wimpey is, in principle, supportive of the Council's approach to building a sufficient headroom into the supply. Taylor Wimpey also welcomes that the Council has applied the buffer to its own housing need and the contribution towards the unmet needs of the BCA's. This ensures that, in the event that some components of the supply do not come forward or are delayed, both needs can be flexibly met.
- 2.28 Notwithstanding this, Taylor Wimpey is concerned that that the PP 2024 proposes to reduce the buffer; the PP 2022 made provision for a 13% buffer however this has been reduced to 10% within the PP 2024. Taylor Wimpey notes that the 10% buffer set out within the PP 2024 is significantly below the range which has been proposed by other LPA's and found sound at examination.
- 2.29 In this context, Taylor Wimpey considers that the Council should incorporate a c.20% buffer (at minimum) within the LPR. This 20% buffer should be applied to both the Councils own need, and the contribution towards the unmet needs of the GBBCHMA. Additional land will therefore need to be identified to enable a c.20% headroom to be built into the supply. In this respect, Taylor Wimpey would like to highlight that growth at land at Clent View Road represents an opportunity to address this need.

Local Plan Review

- 2.30 The Council has recognised that the unmet housing needs of the GBBCHMA are likely to exceed 100,000 dwellings for the period leading up to 2041, and that a future LPR will consider how to address these needs. Taylor Wimpey considers that this approach effectively proposes to defer the issue of addressing the GBBCHMA's unmet needs to a future LPR, without confirming that these needs will be met by South Staffordshire. Taylor Wimpey also notes that the Council does not make any commitment to a LPR within the PP 2024.
- 2.31 Taylor Wimpey therefore considers that the Council has not provided clear timescales or sufficient certainty of outcome. This approach does not deliver the GBBCHMA's identified housing needs and would result in a vacuum in the period post 2031. By not committing to review the plan, the PP 2024 is also not in accordance with paragraph 33 of the NPPF which states that a review is required at "*least once every five years*".
- 2.32 Consequently, Taylor Wimpey would encourage the Council to consider an early review of the Local Plan. It should be noted that there is precedence for such an approach within the HMA area, notably from Bromsgrove and Lichfield. Both of these LPA's have policies within their adopted Local Plans which require an early LPR.

- 2.33 An early LPR should align with the other Local Plans under preparation within the GBBCHMA (e.g. Birmingham and the BCA's). This would make sure that the LPR process aligns with the evidence confirming the quantum of the GBBCHMA's unmet housing needs. This would ensure that South Staffordshire is able to meet the Duty to Cooperate as required by paragraph 24 of the NPPF.
- 2.34 It is therefore considered that the Council should introduce an additional Local Plan policy which requires the plan to be reviewed within two years of adoption. Whilst there is a statutory requirement to review local plans every five years (NPPF paragraph 33), Taylor Wimpey considers that a mechanism to secure an early review through a policy requirement would be much more effective.

Why is the policy unsound?

- 2.35 Taylor Wimpey considers that, as drafted, Policy DS4 (Development Needs) is unsound. Paragraph 17 of the NPPF makes clear that development plans "*must include strategic policies to address each local planning authority's priorities for the development and use of land in its area*". Paragraph 11b of the NPPF also requires plans to contain strategic policies which "*should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas*". Plans should also be prepared positively and with the objective of contributing to the achievement of sustainable development (Paras 16a and 16b).
- 2.36 Taylor Wimpey is concerned that the Council's proposed approach to addressing the unmet needs of the GBBCHMA, and to meeting its own needs is not appropriate and has not been justified by sufficient evidence. In the context that the PP 2022 indicated that South Staffordshire could sustainably accommodate a far higher level of growth than the PP 2024, Taylor Wimpey also considers that the plan has not been positively prepared. Consequently, Taylor Wimpey considers that it is unlikely that the LPR will deliver on the key Strategic Objectives.
- 2.37 Taylor Wimpey therefore believes that there is a strong argument that South Staffordshire should make a greater contribution to meeting the severe unmet housing needs of the GBBCHMA. The Council should not defer this matter to a future LPR; additional, sustainable sites, which can help to meet these needs should be identified now. Taylor Wimpey considers that this is vital to ensuring that the LPR complies with paragraphs 11b, 16a, 16b, 24, 35a-d of the NPPF and the guidance set out within the PPG. At minimum, the Council should include a review policy within the LPR to ensure that these needs will be met shortly after the LPR is adopted.

Policy DS5 (The Spatial Strategy to 2041)

- 2.38 Draft Policy DS5 (The Spatial Strategy to 2041) outlines a proposed spatial strategy in order to meet the plan's housing requirement for the period leading up to 2041. The spatial strategy outlined within the PP 2024 represents an updated approach to the one which was set out within the PP 2022. Paragraphs 5.12-5.13 of the PP 2024 state that the spatial strategy has been revised in the context of the changes to the NPPF in respect of the Green Belt. Draft Policy DS5 states that an integral part of the strategy is:

“to ensure that growth is distributed to the district’s most sustainable locations, avoiding a disproportionate level of growth in the district’s less sustainable settlements, whilst also recognising that very limited growth in less sustainable areas may be appropriate in limited circumstances set out in the settlement hierarchy below.”

2.39 The PP 2024 also states that (Paragraph 5.61):

“The spatial strategy and distribution the growth outlined in Policy DS4 is based upon a capacity led approach that focuses the majority of growth on the district’s most sustainable settlements, with Green Belt release limited to these Tier 1 settlements.”

2.40 Previously, the PP 2022 had proposed the following spatial strategy for the District:

“The spatial strategy and distribution of growth is based upon an infrastructure led approach. This can mean different things for different locations. For larger strategic sites, this may mean on site delivery of new infrastructure such as a new school or local centre. For smaller villages it may be about smaller scale infrastructure, such as delivering a local play space, or about planning for limited new development that will help sustain existing infrastructure (e.g. local school) over the longer term.” (Paragraph 5.65).

2.41 The updated spatial strategy within the PP 2024 is assessed as ‘Option I’ within the ‘Sustainability Appraisal of the South Staffordshire Local Plan Review (2023-2041)’ (March 2024) (“the SA 2024”). The SA 2024 sets out that Option I comprises a limited contribution towards the needs of the GBBCHMAs and limited Green Belt development in Tier 1 villages.

2.42 Option I was identified alongside Option H (Limited Green Belt development only to meet existing critical infrastructure needs) as an additional spatial strategy option in light of changes to the NPPF in December 2023. It should be noted that Options I and H were not appraised within the SA 2022 which informed the PP 2022. The SA 2022 only assessed spatial strategy options A, B, C, D, E, F and G.

2.43 The land at Clent View Road was not allocated for development within the PP 2022 and has not been allocated within the PP 2024. The PP 2022 previously proposed to make one allocation (Land off Langley Road) along the western edge of the Black Country, after discounting a number of sites (including the land at Clent View Road). However, the PP 2024 no longer proposes any allocations along the western edge of the Black Country. The ‘Housing Site Selection Topic Paper’ (2024) sets out the reasoning for this stating:

“The Council’s preferred Spatial Housing Strategy, as set out in the Council’s Spatial Housing Strategy Topic Paper does not include Green Belt release on the Western Edge of the Black Country, instead preferring to only release Green Belt on suitable sites at Tier 1 settlements within 2km walking distance of a railway station.”

2.44 On the basis of the spatial strategies capacity led approach, the Council is proposing to release only c.0.16% of South Staffordshire’s Green Belt land. This equates to approximately 1,040 dwellings distributed across six sites at the Tier 1 settlements of Great Wyrley, Codsall, Penkridge, Bilbrook, and Cheslyn Hay.

2.45 Taylor Wimpey would like to highlight some concerns regarding the Council’s approach. Whilst the Council has outlined in numerous Topic Papers its justification for pursuing the preferred spatial strategy, a central tenet of the Councils approach is that the quantum of the GBBCHMAs unmet housing needs is unknown, and that, consequently, a small

contribution from South Staffordshire is acceptable. However, as outlined within Taylor Wimpey's comments on draft policy DS4, it is clear that the unmet needs of the GBBCHMA exceed 100,000 dwellings for the period leading up to 2042. The Council should therefore not be deferring this matter to a later date and should instead be helping to meet these needs now, as required by the DTC.

- 2.46 In this regard, Taylor Wimpey wishes to highlight that the changes made to the NPPF in respect of the need for Green Belt release, do not preclude an LPA from releasing Green Belt land where the sequential approach has been satisfied in respect of utilising its supply of brownfield land, optimising densities and engaging with neighbouring authorities to assist in meeting needs and demonstrating that exceptional circumstances exist (Para 146, NPPF). The release of further Green Belt land within South Staffordshire to help address the unmet housing needs of the GBBCHMA is therefore entirely consistent with the NPPF. Taylor Wimpey notes that the Council's 'Green Belt Exceptional Circumstances Topic Paper (April 2024)' ("the GBES Topic Paper") has already shown that the sequential approach has been satisfied and that exceptional circumstances exist. Furthermore, the Council has decided to release Green Belt, meaning that any further housing growth will require more Green Belt to be released.
- 2.47 Taylor Wimpey considers that the Councils revised spatial strategy is overly contrived and has been designed to lower the housing requirement and to limit Green Belt release. This does not represent an approach which is aspirational or positively prepared. Consequently, the Council is failing to help address the unmet needs of neighbouring authorities within the GBBCHMA. Taylor Wimpey acknowledges that lower housing growth and a smaller contribution towards the unmet needs of the GBBCHMA would be considered more sustainable in terms of the SA. However, the previous spatial strategy (as set out within the PP 2022) was also considered to be sustainable, as demonstrated by the evidence base which underpinned the PP 2022.
- 2.48 Considering the above, Taylor Wimpey would strongly encourage the Council to release further Green Belt through the LPR to address the unmet housing needs of the GBBCHMA. As set out within Taylor Wimpey's previous representations to the PP 2022 consultation, Taylor Wimpey considers that the Council should allocate growth on the western edge of the Black Country, specifically the west border of Stourbridge. It is Taylor Wimpey's position that the Council has not duly considered the role that the settlements along the western edge of the Black Country (such as Stourbridge) hold in terms of achieving sustainable development and addressing the housing need.
- 2.49 The settlement of Stourbridge is sustainably located and provides access to a variety of existing services, facilities, and employment opportunities. Despite this, the spatial strategy contained within draft Policy DS5 has ignored the strategic role of settlements on the western edge of the Black Country. Indeed, the revised PP 2024 spatial strategy actually deallocates the only allocation made on the western edge of the Black Country with the PP 2022 (Land at Langley Road).
- 2.50 Taylor Wimpey notes that Paragraph 5.48 of the PP 2022 had previously set out that:

“This area [western edge of the Black Country] provides an opportunity to accommodate housing growth directly adjacent to the towns and cities within the Black Country, in a location identified as a strategic priority for dispersed housing growth in the GBBCHMA Strategic Growth Study.”

2.51 However, the PP 2024 no longer includes this supporting text and directs no growth towards the western edge of the Black Country. This is despite the PP 2022 fundamentally accepting that growth should be directed towards this location and that there are appropriate sites which are capable of accommodating sustainable development.

2.52 Taylor Wimpey would like to highlight that Page 16 of the PP 2024 recognises the functional relationship between the District and Dudley by stating the following:

“South Staffordshire EDNA (2022) identifies South Staffordshire as being in the same FEMA (Functional Economic Market Area) as Cannock Chase, Dudley, Stafford, Walsall and Wolverhampton.”

2.53 The Spatial Housing Strategy Topic Paper (2024) also acknowledges that a key disadvantage of the Councils spatial strategy (PP 2024) is that it:

“Doesn’t deliver the GBBCHMA Strategic Growth Study recommendations for employment-led growth of proportionate dispersal along the western edge of the Black Country.”

2.54 In this context, Taylor Wimpey considers that development on the edge of Dudley should be supported given the functional relationship between the South Staffordshire and Dudley Councils. Cross-boundary growth is a suitable strategy which can help address the unmet housing needs of the wider GBBCHMA and Dudley. Therefore, Taylor Wimpey considers that it would be a highly appropriate and reasonable strategy to direct growth towards the western edge of the Black Country.

2.55 Taylor Wimpey would also highlight that, whilst it is justified to consider ‘harm’ in the balance when assessing exceptional circumstances for Green Belt release, it is not compliant with national policy to release only those sites which perform the worst against the Green Belt purposes (i.e. low Green Belt harm). There is a need to consider the broader Green Belt policies within the NPPF as a whole. The Council has not had regard to these matters within the PP 2024 or the LPR evidence base. It is Taylor Wimpey’s position that it is logical that exceptional circumstances can trump the purpose the Green Belt (e.g. Green Belt land that strongly fulfils Green Belt purposes can be released if it is consistent with the LPR spatial strategy for meeting requirements for sustainable development).⁶

2.56 In this context, Taylor Wimpey would encourage the Council to amend Draft Policy DS5 to reflect the comments within these representations. The Council should consider the land at Clent View Road, Stourbridge for allocation for residential development.

Safeguarding Land

2.57 Notwithstanding the above, Taylor Wimpey would like to highlight that the NPPF is clear that:

⁶ Paragraph 42, *Calverton Parish Council v Nottingham City Council* [2015] EWHC 1078

“...Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.” (Para 145) (Emphasis added)

2.58 Paragraph 148c goes on state that, when defining green belt boundaries, plans should:

“where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period”

2.59 It is apparent to Taylor Wimpey that the Council will need to release further land for housing through a future LPR, either to address GBBCHMA's needs or South Staffordshire's own. As set out within the GBES Topic Paper, there are insufficient non-green belt options for meeting these long-term needs. For these reasons, it is considered likely that the Council will need to revisit releasing Green Belt land in the future. As such, the permanence of the Green Belt Boundaries currently proposed by South Staffordshire are in doubt. By identifying additional safeguarded land, the Council would ensure that no alterations will need to be made to Green Belt boundaries at the end of the plan period.

2.60 Taylor Wimpey notes that the current Core Strategy (2012) adopts this approach (i.e. Policy GB2: Land Safeguarded for Longer Term Needs). Taylor Wimpey therefore considers that safeguarding the land at Clent View Road for future development is a reasonable alternative to the allocation of the site within the LPR. This approach complies with the NPPF and ensures that no review of Green Belt Boundaries will be required until the end of the next plan period (Para 148c, NPPF).

Why is the policy unsound?

2.61 Taylor Wimpey considers that, as drafted, Policy DS5 (The Spatial Strategy to 2041) is unsound. Paragraph 17 of the NPPF makes clear that development plans:

“must include strategic policies to address each local planning authority's priorities for the development and use of land in its area”, Paragraph 11b of the NPPF also requires plans to contain strategic policies which *“should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas”*.

2.62 Plans should also be prepared positively and with the objective of contributing to the achievement of sustainable development (Paras 16a and 16b).

2.63 The spatial strategy proposed within the PP 2024 would not adequately address the unmet needs of the GBBCHMA or the Council's own needs. Taylor Wimpey also considers that the strategy has not been justified by sufficient evidence and has not been positively prepared; the PP 2024 indicates that it can accommodate a far lower level of growth than what was suggested within the PP 2022.

2.64 In this context, Taylor Wimpey would encourage the Council to distribute growth to the land at Clent View Road, Stourbridge for residential development to help address these needs. This is vital to ensuring that the LPR accords with paragraphs 11b, 16a, 16b, 24, 35a-d of the NPPF and the guidance set out within the PPG. In the absence of this, the Council should identify land to safeguard to guarantee that these needs can be met shortly after the

LPR has been adopted and to protect the permanence of the Green Belt boundaries. This ensures that the LPR is in compliance with the requirements of paragraph 148c and 148e of the NPPF.

Policy SA5 (Housing Allocations)

- 2.65 Draft Policy SA5 (Housing Allocations) of the PP 2024 sets out the preferred site allocations across the district over the Plan Period. The PP 2024 does not propose any allocations along the western edge of the Black Country. Previously, the PP 2022 proposed to allocate one site in this location after discounting a number of sites, including Taylor Wimpey's site, Clent View Road.
- 2.66 The latest version of the SA 2024, the 2022 GBS and the 'Housing Site Selection Topic Paper (2024)' [HSSTP] have been published to reflect the site selection process underpinning the PP 2024. As set out within previous representations, Taylor Wimpey has some concerns regarding how the site selection process has been carried out.
- 2.67 The 2023 SHELAA Report [SHELAA] assesses the land at Clent View Road as site 683a and site 683b. Appendix 1 of the HSSTP sets out that the sites were assessed as unsuitable within the SHELAA and therefore discounted. Taylor Wimpey notes that the SHELAA sets out the following comments regarding site 683a:
- "The site is a cross-boundary site suggestion, and there is not currently any suggestion that Dudley Met. Borough Council are allocating the land in their portion of the site. Notwithstanding this, the site is separated from the urban edge by a well-established landscape buffer and it is unclear how access would be gained to the site. Site modelled at 32 dwellings per hectare."*
- 2.68 In respect of Site B, the SHELAA states:
- "The site forms part of a wider cross-boundary site suggestion along with site 683a. This parcel has been considered in isolation as it is remote from the majority of parcel 683a. The site itself is physically remote from the urban edge of Dudley. Site modelled at 32 dwellings per hectare."*
- 2.69 The SHELAA finds that both sites are unsuitable on the basis that they are disassociated from any village development boundary. The SHELAA sets out that *"a site is considered disassociated from a village development boundary when it is not directly adjacent to it."* However, it is important to recognise that the sites lie in close proximity to Stourbridge, a sustainable settlement which falls within the LPA of Dudley. Any development would consequently have access to facilities such as schools, GP practices and supermarkets. Furthermore, when the wider cross-boundary site is considered in totality, it should be noted that it lies adjacent to Stourbridge.
- 2.70 In respect of access, the vision document within Appendix 1 sets out that whilst Clent View Road represents the only opportunity to gain vehicular access to the site, it is considered that the road has the capacity to accommodate the additional traffic/ vehicle flows associated with the development. A safe and attractive pedestrian access to the site would also be provided. In the context of the above, Taylor Wimpey considers that the site should not have been disregarded as unsuitable.

- 2.71 With regards to the impact on the Green Belt, the site is identified as site reference 683a and site reference 280 (the GBS uses Black Country Authorities site references for cross-boundary sites within Sub-parcel scenarios in South Staffordshire) within the GBS. They both sit within 'Sub-Parcel Ref S82CS2 of the Stage 2 Green Belt Assessment ("the Stage 2 assessment"), which concludes that the degree of harm that would result from the release of the site would be 'High'. However, Taylor Wimpey considers that the land at Clent View Road would perform a limited contribution to the five purposes of the Green Belt if it were to be reviewed on a site-specific basis. In this regard, an assessment of the site's compliance with the five Green Belt purposes is set out within the Vision Document.
- 2.72 In any event, whilst it is justified to consider 'harm' in the balance when assessing exceptional circumstances for Green Belt release, it is not compliant with national policy to release only those sites which perform the worst against the Green Belt purposes (i.e. low Green Belt harm). There is a need to consider the broader Green Belt policies in the NPPF as a whole. As such, regard should be had to the promotion of sustainable patterns of development, access to public transport, whether compensatory improvements could offset the harm from removal (Para 147, NPPF), and consistency of the Green Belt with the emerging Local Plan strategy.
- 2.73 In this context, it is an essential part of the exceptional circumstances test that logically exceptional circumstances must be capable of trumping the purposes of the Green Belt. For example, it is conceptually possible for Green Belt land that fulfils strong Green Belt purposes to be released if it is consistent with the Local Plan strategy for meeting requirements for sustainable development, for example, to secure further land supply via more sustainable patterns of development. As such, Taylor Wimpey considers that it is entirely reasonable, and appropriate, for land which fulfils strong Green Belt purposes to be released where exceptional circumstances are evidenced.
- 2.74 The site is located on the edge of Stourbridge, which has high sustainability credentials in terms of proximity to existing shops and services, and access to existing transport routes and infrastructure. As a result, Taylor Wimpey still contend that the Council has continued to ignore the strategic role of settlements on the western edge of the Black Country (such as Stourbridge), even though several services and facilities fall within the settlement's boundary.
- 2.75 Overall, it is evident that there are opportunities to allocate additional 'suitable, available and achievable' sites in sustainable locations across the district, in particular along the western edge of the Black Country. This location is a suitable option for growth that is capable of contributing towards the housing need emerging through the Local Plan Review.
- 2.76 Working in consideration that a smaller area than what has previously been assessed would be developed, that the site would be well-served by the existing transport infrastructure (Para 147, NPPF) and the wider mitigation benefits (such as the provision of new open space) the site should be removed from the Green Belt.
- 2.77 Specifically, Taylor Wimpey recommends that the land at Clent View Road should be allocated as it is a sustainable and appropriate opportunity to provide much needed housing within the upcoming Plan period. Importantly, the Council has identified exceptional circumstances for reviewing the Green Belt, and thus Taylor Wimpey

encourages the Council to consider the land at Clent View Road as a suitable opportunity for residential development.

Land at Clent View Road

- 2.78 As set out previously, Taylor Wimpey is promoting the land at Clent View Road, Stourbridge for residential development. The Vision Document attached to Appendix 1 of these representations demonstrates Taylor Wimpey’s commitment to helping South Staffordshire achieve its aspirations and vision over the next Plan Period, by creating an attractive and healthy environment for future residents which focuses on sustainability, green infrastructure and biodiversity, community needs, accessibility and active travel.
- 2.79 The site is adjacent to the western edge of Stourbridge and is therefore in close proximity to a range of services and facilities. It is within a 30-minute walk of the town centre, where Stourbridge Town Railway station is available. The site is also located c. 0.4km from Shenstone Avenue bus stop, which provides regular services to the centre of Stourbridge and Dudley.
- 2.80 The development at land at Clent View Road would deliver approximately 400 high-quality new dwellings, which would meet the needs of the local community with a mix of house types and tenures. It would make provision for attractive public open spaces and would include facilities such as LEAPS and MUGAs. High quality pedestrian routes would also run through the site ensuring users experience a safe and attractive environment.

Why is the policy unsound?

- 2.81 As set out previously, Taylor Wimpey is concerned that the Council’s proposed approach to addressing the unmet needs of the GBBCHMA, and to meeting its own needs is not appropriate and has not been justified by sufficient evidence. In the context that the PP 2022 indicated that South Staffordshire could sustainably accommodate a far higher level of growth than the PP 2024, Taylor Wimpey also considers that the plan has not been positively prepared in accordance with paragraph 16b of the NPPF.
- 2.82 Taylor Wimpey therefore believes that there is a strong argument that South Staffordshire should make a greater contribution to meeting the severe unmet housing needs of the GBBCHMA. In this context, it is necessary for the Council to identify further sites where growth can be sustainably located. Taylor Wimpey would like to highlight that the land at Clent View Road represents a sustainable, suitable site which should be considered for allocation.

Policy HC1 (Housing Mix)

- 2.83 The NPPF highlights the importance of ensuring an appropriate housing mix, stating that it is vital that the needs of groups with specific housing requirements are addressed (Para 60).
- 2.84 Paragraph 63 goes on to state that *“the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies”*. Furthermore, the PPG states that *“strategic policy-making authorities will need to look at the current stock of houses of different sizes and assess whether these match current and future needs”* (PPG ID: 2a-023). In this regard, Draft Policy HC1 sets out that:

“All new housing developments should provide a mixture of property sizes, types and tenures in order to meet the needs of different groups in the community...On major development housing sites (excluding sites exclusively provided for self-build or custom housebuilding), the market housing must include a minimum of 70% of properties with 3 bedrooms or less, with the specific mix breakdown to be determined on a site-by-site basis and reflective of need identified in the council’s latest Housing Market Assessment.”

- 2.85 As set out within Taylor Wimpey’s previous representations, it is considered that draft Policy HC1 is too inflexible. Taylor Wimpey considers that draft Policy HC1 should allow for proposed housing mixes to be justified based on market signals and evidence of housing need and demand at the point of decision-making, rather than a prescribed housing mix set out in the current Housing Market Assessment which could quickly become out-of-date. This is crucial as a more up-to-date assessment of local housing needs could supersede the latest Housing Market Assessment at the point of decision-making.
- 2.86 Additionally, Taylor Wimpey has previously raised concerns about applying a prescriptive, district-wide housing mix when different areas will have differing requirements and demographic profiles. Flexibility within the policy is required as the housing mixes across urban, suburban and rural areas will generally be reflective of the locations’ existing characteristics.
- 2.87 Furthermore, densities in urban areas and town centres will generally be higher (and more suited to smaller 1-2 bed dwellings), whilst being lower on the edge of settlements and in rural areas. This is generally consistent with NPPF paragraph 128, in regard to making effective and efficient use of land and achieving appropriate densities. It would, therefore, be reasonable for schemes across the district to deliver different mixes of housing whilst still meeting the overall district-wide need.
- 2.88 Whilst Taylor Wimpey supports the Council’s approach of assessing development on a site-by-site basis, Taylor Wimpey would encourage the Council to apply a degree of flexibility to the Policy. The housing mix should therefore be determined in accordance with the most up to date market evidence.

Why is the policy unsound?

- 2.89 Paragraph 86(d) of the NPPF is clear that planning policies should:
- “be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”*
- 2.90 Paragraph 63 of the NPPF goes on to state that *“the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies”*.
- 2.91 Taylor Wimpey considers that Policy HC1, as drafted, is overly prescriptive. It does not allow for sufficient flexibility to react to new evidence which suggests the districts housing needs have changed. Additionally, the Councils district wide approach to housing mixes does not adequately assess the housing needs of different communities within South Staffordshire.

- 2.92 To address this, Taylor Wimpey would encourage the Council to amend policy HC1 to enable housing mixes to be justified based upon up-to-date market evidence of housing need and demand at the point of decision making. This would ensure that the PP 2024 is sound and compliant with paragraphs 63 and 86(d) of the NPPF.

Policy HC4 (Homes for older people and others with special housing requirements)

- 2.93 Policy HC4 (Homes for Older People and Others with Specialist Housing Requirements) sets out that:

“All major developments will also be required to ensure 100% of both the market and affordable housing meets the higher access standards Part M4(2) Category 2: Accessible and adaptable dwellings of Building Regulations.”

- 2.94 Taylor Wimpey welcomes that the Council is committed to making housing accessible for all. Notwithstanding this, Taylor Wimpey is concerned that, as drafted, the policy is not sufficiently flexible as required by paragraph 86(d) of the NPPF. In regard to the introduction of accessibility standards, Taylor Wimpey also notes that the PPG is clear that:

“Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied.” (PPG I.D: 56-008).

- 2.95 Taylor Wimpey is concerned that, as drafted, Policy HC4 does not allow for site specific circumstances or viability to be considered. This contradicts the guidance set out within the PPG.

Why is the policy unsound?

- 2.96 Paragraph 86d of the NPPF sets out that local plan policies should be flexible enough to adapt to unforeseen circumstances. The PPG is also clear that site specific factors should be considered within Local Plan policies when introducing accessibility requirements.

- 2.97 In this context, Taylor Wimpey considers that the policy must be amended to introduce flexibility and recognise that not every site will be able to achieve the accessibility standards (for example where there are technical or viability constraints).

Appendix 1 Vision Document

**Taylor
Wimpey**

Land at Clent View Road, Stourbridge

Vision Statement

October 2021



Taylor Wimpey

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LICHFIELDS



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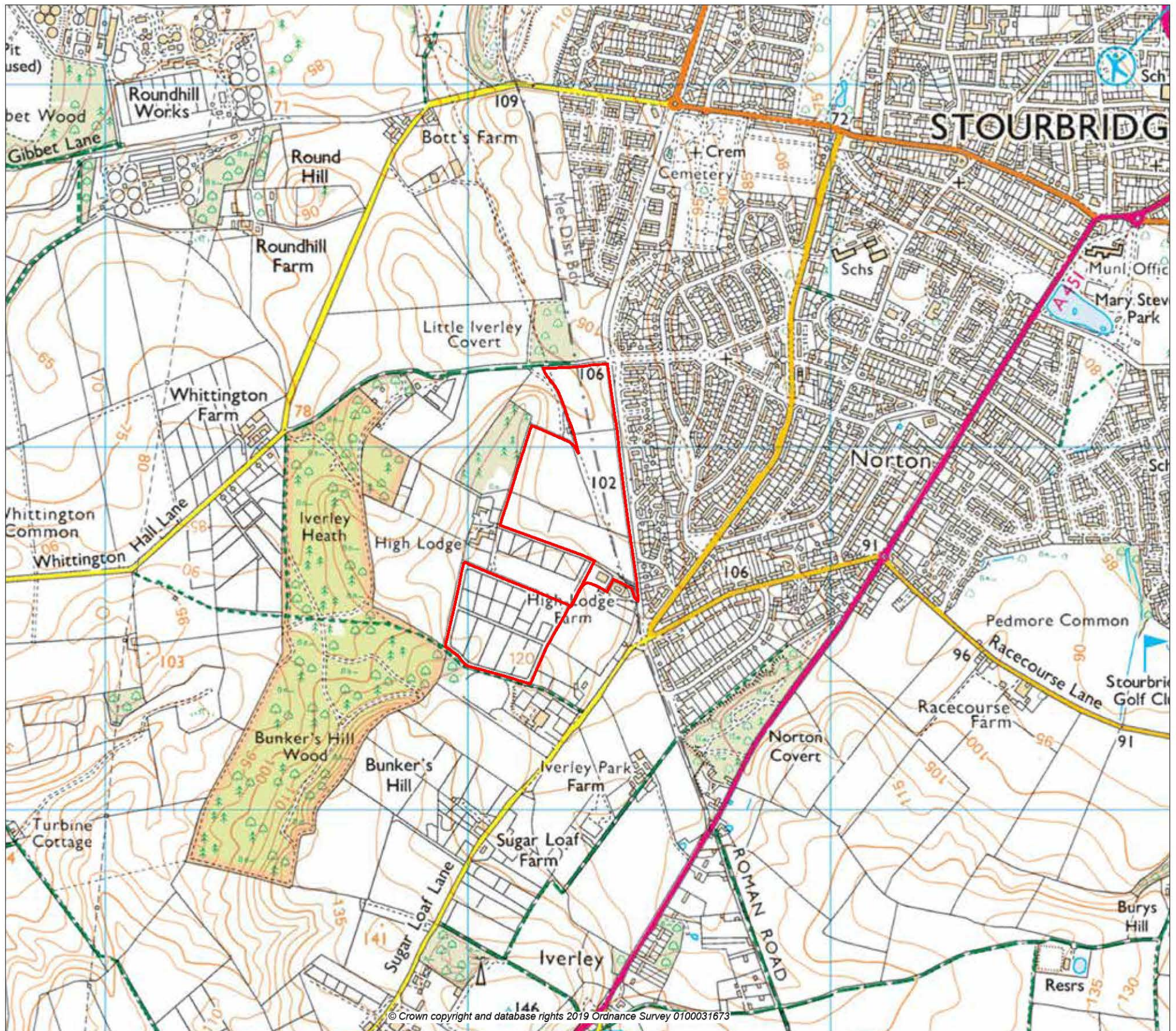


1.0

Introduction



Figure 1: Location Plan



1.0 Introduction

This Vision Statement has been prepared to demonstrate that the land at Clent View Road, Stourbridge [the Site] is suitable, available and deliverable. The Site is in the control of Taylor Wimpey UK Limited [Taylor Wimpey] who are capable of delivering a high quality and sustainable development of up to 400 dwellings.

This document supports the allocation of Clent View Road, Stourbridge in the emerging South Staffordshire Local Plan review and the Black Country Plan review [BCP] to assist in meeting the acute local housing needs for both South Staffordshire District and Dudley Metropolitan Borough.

The Vision Statement will:

- Outline the opportunity presented by the allocation and future development of the Site and its potential to deliver up to 400 dwellings;
- Set out the vision for the Site and summarises the design process that has led to the preparation of the Masterplan;
- Demonstrate that the vision for Clent View Road, Stourbridge can be delivered; and,
- Show that the proposed allocation and future development will deliver the Councils' objectives for the area.





2.0 Site Context



Figure 2: Site Location and Photographs



SITE PHOTO 1: Taken from Bridleway to the north of Parcel A, overlooking the north and western edges of the site. Frogghall Cottages seen within view, to centre of photograph and farm building within site to left of photo.



SITE PHOTO 2: Taken from track leading to Frogghall Cottages, located to the north west of Parcel A. View looks across the north of the site towards Westwood Avenue. Little Iverley Covert is seen to left of photograph.



SITE PHOTO 3: Taken from Chestnut Close, on the edge of Stourbridge, overlooking the site. Desire lines to Roman Road footpath can be seen to the centre of photo, as well as the land rising to the rear of the site.



SITE PHOTO 4: Taken from Roman Road footpath, looking northwards along the route. Properties to the west of Stourbridge are seen within photo to the right-hand side. Large veteran Pine trees are located on the site's edge to the west of the footpath.

2.0 Site Context

The Site

The site is located on the western edge of Stourbridge and is bordered by Clent View Road to the east. The site is located primarily within the local authority boundary of South Staffordshire District Council [SSDC] but is also partially within the authority boundary of Dudley Metropolitan Borough Council [DMBC].

The Site comprises 19.6ha of improved grassland (16.5ha in South Staffordshire and 3.1ha in Dudley) currently used as equestrian paddocks.

The site is situated approximately 2.5km south-west of the centre of Stourbridge and immediately abuts the established residential suburb of Stourbridge to the east, which is located within DMBC.



SITE PHOTO 5: Taken from south east of Parcel A, looking towards to the north of the site. Froghall Cottages can be seen to the left of photo. The rise in the landform seen in Site Photo 2 can be seen to the centre, with Little Iverley Copse to the rear.

Surroundings and Context

The Site is contained within well defined existing boundaries. It is bounded to the north by a public bridleway beyond which is dense woodland and agricultural land. To the east there is a permissive footpath named 'Roman Road', Clent View Road and the urban area of Stourbridge. This footpath is separated from the Site and Clent View Road by hedgerows. To the south there is a Public Right of Way and a line of mature trees, beyond which lies agricultural land; and to the south-west is a heavily wooded area (Bunkers Hill Wood). To the west, a line of trees extending from the northern boundary of the site to Frog Hall Cottages, bound the site towards the centre west. The site is further bounded to the west by a heavily wooded area, and a further line of trees which joins the wooded area to the south-west of the site, beyond which lies agricultural land.



SITE PHOTO 6: Taken from south of Parcel A, looking over the site. Froghall Cottages are within view, as is the edge of Iverley Heath (to the left) and Stourbridge (to the right).



SITE PHOTO 7: Taken from north west of Parcel B, looking over the site. The photo shows the equestrian paddocks across the site, as well as the footpath along the southern edge of the site, overlooking Stourbridge Lawn & Squash Club.



SITE PHOTO 8: Taken from south east of Parcel B, looking north over the site. The photo is taken from a gap in the hedgerow along the footpath, to the south of the site, and leading to Bunker's Hill Wood.



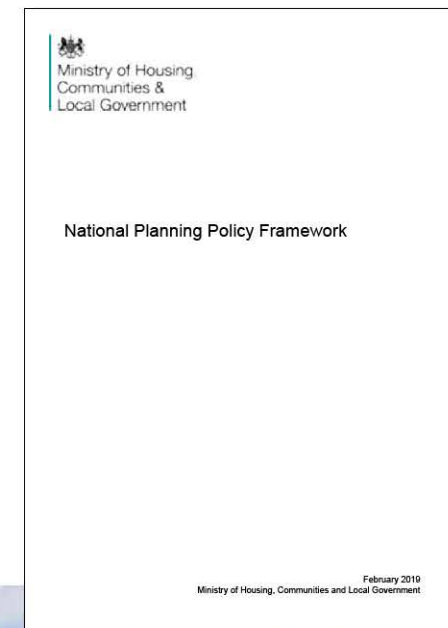
3.0

Meeting the Need for Development



3.0 Meeting the Need for Development

The Government is committed to boosting the supply of new homes to deliver 300,000 per year by the middle of the decade. The 2019 update of the National Planning Policy Framework [the Framework] introduced a standard methodology for the assessment of Local Housing Need [LHN] which is to be used to “*identify the minimum number of homes expected to be planned for*”¹. There have been several versions of the standard methodology, with the current iteration (16th December 2020 [‘the Standard Method 2’]) introducing a 35% uplift, which is applied for the top 20 largest cities and urban centres in England (which includes both Wolverhampton and Birmingham).



Applying the SM2 approach results in an LHN figure of **243 dpa** for South Staffordshire. This represents the minimum number of homes needed per year as set out in paragraph 61 of the revised Framework (July 2021).

For Dudley, the LHN figure is **635 dpa** although as we set out below, as it is one of the four Black Country authorities, there are significant issues to be addressed regarding the extent to which the housing need can be delivered. In total, the Black Country authorities have an overall annual need for **4,001 dpa** (including 1,466 dpa in Sandwell, 869 dpa in Walsall and 1,041 dpa in Wolverhampton).

It is important to note that the Government guidance is clear that the SM2 LHN is only intended to be a **minimum** figure. The 2020 PPG states that there will be circumstances when a higher figure than that generated by the SM2 might be considered. This is because SM2 does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates, including taking on unmet need from neighbouring authorities².

In this regard, both South Staffordshire and Dudley form part of the Greater Birmingham and Black Country Housing Market Area [GBBCHMA] and have committed to help meet the unmet needs arising from the wider HMA.

¹. Planning Practice Guidance
Ref ID: 2a-002-2019022

². Planning Practice Guidance
Ref ID: 2a-010-20201216





South Staffordshire

The Preferred Options Local Plan (September 2021) proposes to plan for a housing target of 8,881 dwellings between 2018 and 2038. This comprises of 4,131 dwellings to meet South Staffordshire's own housing need using the government's standard method (2021-2038), 750 completions in the District since the start of the plan period (2018-2021), and 4,000 dwellings to contribute towards the unmet needs of the GBCHMA.

The Preferred Options Local Plan recognises the need to balance the protection of the Green Belt with the need to deliver a sustainable growth strategy that meets the district's housing needs. It acknowledges the lack of suitable brownfield sites to meet this need and proposes Green Belt release on this basis. The proposed Spatial Strategy indicates a supply of 10,034 dwellings to meet the identified housing target of 8,881 dwellings but there is no guarantee that all of these sites will come forward as anticipated. We also consider that a higher housing target is appropriate for the reasons identified below.

At a very basic level, the current SM2 figure is 243 dpa, which equates to 4,131 dwellings over the plan period. However, as noted above, the 243 dpa SM2 figure is the minimum starting point, and the Preferred Options Local Plan does not confirm whether the Council has undertaken an exercise to assess whether there are exceptional circumstances to indicate that a higher LHN figure would be appropriate to meet its own needs, even before the discussion turns to the extent to which it needs to be providing for the wider HMA's unmet needs, which are extremely high.

With regard to the 4,000 dwellings proposed to contribute towards the unmet needs of the GBCHMA the emerging Plan states:

“Since we proposed to accommodate this level of growth in 2018, updated land supply statements produced by the GBHMA local authorities have indicated the extent of the housing shortfall up to 2031 appears to have fallen significantly, whilst also indicating that the Black Country's urban capacity evidence shows a significant level of housing need arising into the later 2030s. This is also reflected in the Draft Black Country Plan consultation, which seeks to deliver housing in urban areas and through Green Belt release to meet the area's housing needs, delivering 47,837 homes within the Black Country up to 2039 whilst indicating a potential shortfall of 28,239 homes they seek to export through the Duty to Cooperate. Whilst the Council will be working with the Birmingham and the Black Country authorities to ensure that housing supply within their administrative areas is truly maximised prior to being exported to other areas, it still is clear from evidence to date that a significant housing shortfall is likely to remain across the GBHMA”.

This significantly underestimates the true extent of unmet need. For example, the 2021 Draft BCP identifies a huge shortfall of 28,239 homes across the four Black Country districts, a 63% increase from the 17,300 shortfall identified in the 2018 review when SSSDC decided to contribute 4,000 dwellings to this need. At 23% in 2018, if a similar proportionate contribution was made by South Staffordshire to the Black Country's current shortfall, this would see the District's contribution increase to 6,529 dwellings – an increase of 2,529.

It should also be noted that the very significant challenge of meeting Birmingham City's unmet need has not gone away and indeed is likely to intensify in the near future. At present, Birmingham City Council's adopted Local Plan has a target of 2,555 dpa. The current SM2 figure is 4,829 dpa, a difference of 2,274. However, this figure is capped at 40% above the adopted Plan target, a cap which falls away after the Plan is over 5 years of age. This tipping point will occur in January 2022, after which Birmingham's minimum starting point LHN increases to a huge 6,750 dpa. This will put even greater pressure on districts in the HMA such as South Staffordshire to contribute an even greater share of this housing need.

Furthermore, as Green Belt release is required to meet the preferred level of housing growth in the district, additional Green Belt release will be required to meet any further need.

Dudley

As a part of the ongoing preparation of the BCP, the Black Country authorities published the 'Black Country Urban Capacity Review Update' in May 2021 [the BCUCRU]. The BCUCRU identifies the Black Country's Standard Method 2 LHN figure as 4,004 homes per annum or 76,076 homes over the period 2020-39. At the time of writing (July 2021), this has actually increased slightly, to 4,011 dwellings, or 76,209 dwellings over the 19-year plan period.

Taking into account existing supply (the amount of housing need which can be accommodated in the Black Country urban areas) the BCUCRU concludes that the housing shortfall across the Black Country is significant, at around 36,819 homes over the period 2020-2039. This is despite reviewing all potential sources of housing capacity, making a series of structured assumptions around density and windfalls, and comprehensively exploring the capacity on occupied employment land in the context of up-to-date employment land evidence.

The purpose of the BCUCR is to identify whether any further potential development capacity can be found in the urban areas of the Black Country in accordance with requirements of paragraph 141 of the Framework. It concludes that it is not possible to meet the significant need for housing land in the urban area.

The 2021 Draft BCP acknowledges that it is not possible to provide for all the Black Country's housing and employment land needs within its administrative boundaries, given the circumstances around land deliverability, constraints and the need to protect the unique character of the area. Following on from the BCUCR, the Plan concludes that exceptional circumstances have been demonstrated to remove certain areas of land from the Black Country Green Belt to meet housing needs.

In this regard, against an identified need for a minimum of 76,076 homes over the period 2020-2039, a target of 47,837 is identified (including Green Belt releases) – a shortfall of 28,239 dwellings. The emerging Plan acknowledges that the Framework requires this unmet housing need to be provided for across the Housing Market Area, Functional Economic Market Area [FEMA] and other areas with which the Black Country has a physical or functional relationship. This includes South Staffordshire.

Clearly, a large number of new homes and supporting services will need to be accommodated outside the existing urban area of the Black Country on Green Belt land.

There is a significant shortfall of 28,239 homes and the BCP has failed to provide sufficient land through Green Belt release to meet this minimum need. There is a need for the Black Country Authorities to grapple with this issue more robustly and ensure that sufficient housing land is provided through additional Green Belt release.

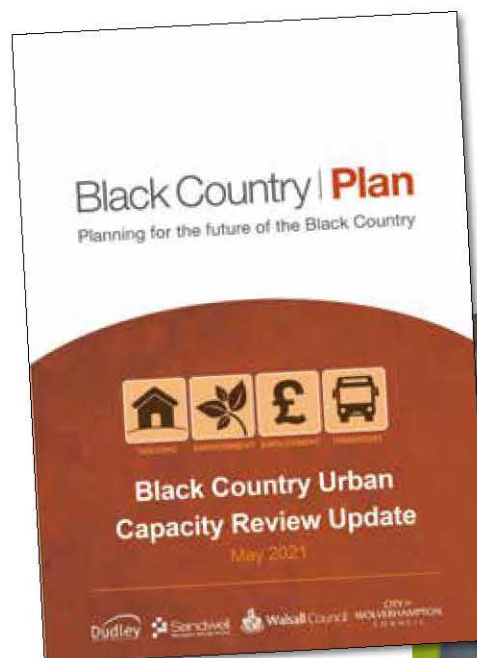
The 2021 Draft Black Country Plan states that the Black Country Authorities will support their neighbours in bringing forward land for housing and employment that sits adjacent to the existing administrative boundaries, and will work in partnership to ensure infrastructure needs are met in full across administrative boundaries. As the only non-Black Country district that borders Wolverhampton, as well as abutting both Dudley and Walsall, South Staffordshire is the most logical district to accommodate these unmet needs.

Exceptional Circumstances

The Framework states that Green Belt boundaries should only be altered in exceptional circumstances. It is clear that such circumstances exist in the Black Country and South Staffordshire and the authorities have appropriately discharged their obligation in paragraph 141 of the Framework to consider "all other reasonable options for meeting its identified need for development".

In order to meet housing need, it is considered that the Clent View Road Site should be allocated for residential development as part of the emerging BCP and South Staffordshire Local Plans.

Insufficient land is available within the Black Country and South Staffordshire on non-Green Belt land to meet the unmet housing needs of present and future generations and the release of Green Belt land is required. Exceptional circumstances therefore exist to remove land from the Green Belt. There is a clear and compelling need for the Black Country Authorities to address the identified shortfall of 28,239 homes through additional Green Belt release to ensure that sufficient housing land is provided. This is even before the very significant unmet need in Birmingham is taken into account, which will necessitate even higher levels of provision in HMA districts such as South Staffordshire.



Will Taylor Wimpey invest in South Staffordshire and Dudley?

Like many areas in the UK, South Staffordshire and Dudley are expected to experience a shortfall in available non-Green Belt land to meet future development needs. If this issue is not addressed there will be a clear imbalance between supply and demand with insufficient houses coming onto the local property market and there will be limited opportunities for prospective purchasers. As a consequence, this makes South Staffordshire and Dudley an attractive market for Taylor Wimpey to invest in.

About Taylor Wimpey

Taylor Wimpey UK Limited is a dedicated homebuilding company with over 126 years' experience; we have an unparalleled record in our industry. We aim to be the homebuilder of choice for our customers, our employees, our shareholders and for the communities in which we operate.

We have expertise in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure which improves our customers' quality of life and adds value to their homes. We draw on our experience as a provider of quality homes to meet the expectations of today's buyers and strive to provide the best quality homes, while setting new standards of customer care in the industry. Our 23 regional businesses in the UK give our operations significant scale and national geographic coverage.

With unrivalled experience of building homes and communities Taylor Wimpey continues to be a dedicated house building company and is at the forefront of the industry in build quality, design, health and safety, customer service and satisfaction.

Taylor Wimpey is committed to creating and delivering value for our customers and shareholders alike. Taylor Wimpey combines the strengths of a national developer with the focus of small local business units. This creates a unique framework of local and national knowledge, supported by the financial strength and highest standards of corporate governance of a major plc.

Taylor Wimpey's development experience

Taylor Wimpey Strategic Land (West Midlands Division) is responsible for the promotion of future development opportunities, such as this Site through the planning system. Taylor Wimpey Strategic Land has a large active land portfolio of Brownfield and Greenfield Sites in the West Midlands varying from 5-250 acres which are at various stages of the planning system.

Taylor Wimpey is the largest and most successful developer/promoter of Strategic Land in the Country. More specifically, over the past 5 years in the West Midlands, Taylor Wimpey Strategic Land has secured permission or allocations for c. 8,000 new homes. This successful strategy comes from ensuring a close working relationship with landowners, Local Authorities, politicians and local communities.



4

4.0

**What are the
Planning
Objectives**



4.0 What are the Planning Objectives

Planning Policy

The Framework outlines the Government's commitment to boosting the supply of housing and ensuring that land allocated for development is deliverable and can support the provision of affordable homes.

The Framework stresses the "presumption in favour of sustainable development" with development meeting social, economic and environmental objectives. In this context the Framework promotes the delivery of sufficient housing to meet the needs of the local community, as informed by local housing need assessment (using the standard method in national guidance).

The Framework highlights that an essential characteristic of Green Belts is their permanence. As a consequence, changes to Green Belt boundaries will only be appropriate where "exceptional circumstances are fully evidenced and justified".

The South Staffordshire Core Strategy [SSCS] notes that South Staffordshire occupies a unique position on the edge of the West Midlands conurbation and local residents rely heavily on nearby towns including Stourbridge for their higher order services, such as hospitals, leisure activities, higher education facilities as well as employment opportunities.

Stourbridge is identified within the adopted Black Country Joint Core Strategy [BCJCS] as a Town Centre, which provides for convenience shopping as well local comparison shopping opportunities, local services and local leisure facilities, and are key areas in the settlement hierarchy below Strategic Centres. The provision of housing at Clent View Road will assist in maintaining Stourbridge's role in the settlement hierarchy of Dudley and the wider Black Country and enable easy access to residents in South Staffordshire to the higher order services it provides.

The Site is sustainably located and benefits from access to an established and attractive active travel route (Roman Road) for walking and cycling. A number of schools and local facilities including Stourbridge Town Centre are located within a convenient distance from the site. Development of the Site will assist in the delivery of housing and provide additional benefits for the local community in terms of recreation provision and increased access to greenspace.

Sustainable Development

The Framework explains that the purpose of planning is to help achieve sustainable development. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- **Economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available.
- **Social role** – supporting strong, vibrant and healthy communities.
- **Environmental role** – to protect and enhance our natural, built and historic environment.

Would the development harm Green Belt purposes?

In delivering sustainable development, the Framework attaches great importance to the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The Framework defines a series of tests to demonstrate whether "exceptional circumstances" exist to justify revisions to the Green Belt boundary.

The Framework states that before concluding that "exceptional circumstances" exist, the Council will be required to demonstrate that it has fully examined all other reasonable options for meeting its identified need for development. This includes:

- Making as much use as possible of suitable brownfield Sites and underutilised land;
- Optimising the density of developments; and
- Discussions with neighbouring authorities to ascertain whether they could accommodate the identified need.

The Framework indicates that when drawing up Green Belt boundaries, the Council should consider the need to promote a sustainable pattern of development, channelling development towards the urban area. Where Green Belt land is required for release, consideration should first be given to land which is previously developed and/or well served by public transport.



The South Staffordshire and Black Country Green Belts

In South Staffordshire around 80% of the District is designated as Green Belt. With 20% of the District's countryside not designated as Green Belt, the District is at risk from development 'leapfrogging' to sites immediately beyond the Green Belt boundary which could result in unsustainable patterns of housing, public services or employment land.

The Black Country Green Belt comprises a relatively narrow fringe of countryside within its boundaries to the north, south, and west of the urban area (with more extensive areas of Green Belt lying beyond to the north and west in South Staffordshire), and larger areas within the eastern parts of Sandwell and Walsall boroughs.

LUC have completed Green Belt Studies on behalf of South Staffordshire District Council (July 2019) and the Black Country Authorities (September 2019) as part of the evidence base to inform the Local Plan Reviews.

The part of the site which lies within South Staffordshire is identified within a wider parcel of land [Sub Parcel Ref S82C –Southwest of Stourbridge] in the South Staffordshire Green Belt Study. The Study concludes that the sub parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation at Stourbridge, makes a moderate contribution to maintaining separation between Stourbridge and Kinver; and makes a strong contribution to preventing encroachment in the countryside. The Study notes that no Green Belt land in South Staffordshire makes a contribution to the setting or special character of a historic town. It concludes that all parcels are considered to perform strongly against Purpose 5.

The Study concludes that releasing land here would partially weaken the existing consistent boundary, however the containment provided by the woodland block at Iverley Heath/Bunker's Hill would limit wider harm.

The part of the site which lies within Dudley forms part of a longer parcel of land extending to the north [Sub Parcel Ref B59A – Roman Road] in the Black Country Green Belt Study.

The Study notes that the sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation to the east and to preventing encroachment on the countryside, and a moderate contribution to maintaining the separation of Stourbridge and Kidderminster (via intervening settlements). It concludes that no Green Belt land in the Black Country contributes sufficiently to the setting or special character of any town within or around the study area, to make more than a weak contribution to Green Belt Purpose 4. It also concludes that all Green Belt land within the Black Country makes a strong contribution to urban regeneration (Purpose 5).

Taylor Wimpey considers that the land at Clent View Road would perform a limited contribution to the five tests if it were to be reviewed on a site-specific basis. An assessment of the Site's compliance with the five Green Belt purposes is therefore set out below.

Figure 3: Green Belt Impact Plan



Compliance with the five Green Belt purposes

The following assessment considers the Site against the five purposes of the Green Belt to establish its suitability for Green Belt release. These five purposes are:

- 1 To check the unrestricted sprawl of large built up areas;**
- 2 To prevent neighbouring towns from merging into one another;**
- 3 To assist in safeguarding the countryside from encroachment;**
- 4 To preserve the setting and special character of historic towns;**
- 5 To assist in urban regeneration by encouraging the recycling of derelict and other urban land.**

To check the unrestricted sprawl of large built up areas

The site comprises a land parcel which is adjacent to the existing urban area. Several buildings bound parts of the site to the west (Frog Hall Cottages) and south-west (High Lodge Care Services). The site has a strong woodland boundary to the west, and is further bound to the north by an access road, and to the south by a line of mature trees and a wooded area.

These physical features provide strong, enduring defensible boundaries to the north, south and west of the site. Therefore, the removal of the site from the Green Belt will not result in the unrestricted sprawl of the urban area.

To prevent neighbouring towns from merging into one another

The site is not essential in preventing any neighbouring towns merging into one another. The site does not comprise an essential parcel of land that needs to be kept open for any strategic reason.

The future development of the site would not result in merging of settlements and would retain a significant gap of approximately 2.7km between Stourbridge and Kinver. In addition, a gap of approximately 4.9km between Stourbridge and Kidderminster would be retained. The woodland planting to the west and south west provides a permanent defensible boundary and would ensure that a gap can be retained.

To assist in safeguarding the countryside from encroachment

The Clent View Road Site comprises a natural extension to the urban area and represents a logical continuation of residential development on the edge of Stourbridge. As stated above, the woodland area to the west and south-west provide strong, established boundaries, and the site is bounded to the north by an access road and to the south by a line of mature trees.

The development would result in some encroachment into land which presently is countryside, though it is immediately adjacent to the existing urban area and a sympathetic layout which reinforces site boundaries could assist in the integration of any future development of the land.

The removal of the site from the Green Belt does not affect the purpose of safeguarding the countryside from encroachment.

To preserve the setting and special character of historic towns

The site does not affect the setting and special character of a historic town and therefore does not contravene this purpose.

The removal of the site from the Green Belt does not affect the purpose of preserving the setting and special character of a historic town.

To assist urban regeneration by encouraging the recycling of derelict and other urban land

The release of the Site from the Green Belt would not prevent the recycling of derelict land and other urban land within South Staffordshire or Dudley, as there is insufficient previously developed land available to meet future housing requirements.

The South Staffordshire 2019 Spatial Housing Strategy & Infrastructure Delivery document recognises that the Council's housing target and desire to pursue an infrastructure-led strategy will only be deliverable if Green Belt is released to deliver additional housing land in the district.

The BCUCRU also concludes that the amount of housing need which cannot be accommodated in the Black Country urban areas remains significant, at around 36,819 homes. The Draft BCP fails to adequately address this matter in the Green Belt releases it identifies and a significant shortfall of 28,239 homes remains. Further Green Belt release is necessary in order to address this shortfall. This is even before the very significant unmet need in Birmingham is taken into account, which will necessitate even higher levels of provision in HMA districts such as South Staffordshire.

Therefore, there is a requirement for the identification of new sites on land outside the urban area that are not currently proposed for development. Further land will need to be removed from the Green Belt to meet housing needs.



5.0 **What is the Vision?**



5.0 What is the Vision?

Place Making

Taylor Wimpey's vision for the Site is:

“A sustainable, distinctive and attractive, residential development which will help meet the needs of the community for new housing, retain, protect and enhance key features of the landscape and complement existing development in the local area”.

The Masterplan

The masterplan seeks to retain and enhance the existing attributes of the Site whilst also delivering a high-quality development capable of helping to meet local housing requirements. Development has been set back from the established hedgerows and tree belts which define the edges of the Site to create a network of green open spaces to include POS and native and naturalised planting for the use and enjoyment of local residents. This will help to mitigate the visual impact of the development when viewed from surrounding countryside, as well as providing a sensitive interface between the urban form and surrounding open space.

Naturalised attenuation basins would be provided at the lowest edges of the Site, allowing for the provision of sustainable drainage techniques, whilst also creating further biodiversity value to help support local wildlife and habitats.

The inner areas of the Site have been utilised for a high-quality residential development with the primary vehicle and pedestrian access points proposed off Clent View Road. The scheme will deliver the following key features:

- Up to 400 high quality homes suitable to the needs of the local community with a varied mix of house type, tenure and size.
- A network of safe and attractive Public Open Spaces, including a central greenspace and areas of open grassland incorporating recreation facilities such as LEAPs and MUGAs, as well as native and naturalised planting running along the periphery of the Site for use by local residents and local wildlife alike.
- A legible and attractive hierarchy of routes throughout the Site including a high quality pedestrian routes running through the Site as well as a series of well-designed streets and lanes providing users with attractive and safe connections throughout the development.
- A variety of pedestrian connections to the surrounding area including ‘Roman Road’, the public bridleway to the north and the public footpath to the south.
- A layout which would provide natural surveillance across all areas of public spaces whilst clearly defining private rear gardens.

Figure 4: Concept Masterplan



Constraints and Opportunities

The place-making vision for the Site derives from an analysis of the characteristics for the Site, its context, and the opportunities and constraints which arise.

The constraints are:

- The eastern boundary of the Site is defined by a number of existing properties which face onto the Site. Whilst these properties are separated from the site by Roman Road, their existing boundaries are low with a majority of the houses currently overlooking the Site. Opportunities therefore need to be explored to ensure the development of the Site can be delivered in a way which is sensitive to the visual and residential amenity impact upon these properties.
- Clent View Road running to the east of the Site represents the only opportunity to gain vehicular access into the Site. Clent View Road has the capacity to accommodate the additional traffic/ vehicle flows associated with the development on the Site.
- The course of a Roman Road has been listed within the ordinance survey maps. The inclusion of this within the Site will require further surveys to determine whether a development buffer is required.
- The southern boundary of the site comprises a visually sensitive edge adjacent to the existing public right of way. Areas of green space and screening woodland should be included in order to provide a buffer to the adjacent public right of way and limit encroachment on the surrounding countryside.

The opportunities are:

- To respond to the Site attributes to provide a development which is specific to its context and responding to the needs of the local community.
- The retention and enhancement of the existing tree belts and hedgerows which run along the boundaries of the Site to improve levels of Site containment and mitigate visual impact.
- To provide safe and attractive pedestrian accesses into the Site from Clent View Road and the adjacent permissive footpath 'Roman Road' and the adjacent public bridleways and public footpaths.
- To utilise the Site to provide a high-quality landscape driven development which embraces the green assets to deliver a residential development within a network of high quality greens, routes and spaces.
- Retaining the existing field pattern as part of the site layout would allow for natural breaks within the development and form green corridors leading to open countryside beyond.

The key principles of development arising from the Site opportunities and constraints are:

- To create a development which is specific to Stourbridge by sensitively responding to the unique attributes and characteristics of the Site and its wider context.
- To provide safe and convenient access for both new and existing residents to local amenities and facilities through the delivery of public open space and pedestrian connections to Clent View Road, Roman Road, the public footpath adjacent to the Site leading to Iverley Heath and Bunkers Woods, and the adjacent public bridleway 'Westwood Avenue' to allow for opportunities to access nearby recreation assets, including Little Iverley Covert woodland.
- To provide a central area of greenspace to create a sense of place and provide recreational opportunities within the site through the provision of facilities such as LEAPs and MUGAs, and the use of sustainable links through the site incorporating existing assets such as the Roman Road.
- To provide green gateways into the site along the main accesses, with the opportunity to create tree lined streets to contribute to the character and quality of the development and help mitigate and adapt to climate change.
- To provide a development of suitable scale, form and appearance which meets both the needs of the local community in a sustainable way, whilst also being sensitive to the character of the surrounding townscape and landscape setting.
- To retain, enhance and embrace the Site's natural assets through the inclusion of naturalised green infrastructure including wetland attenuation basins, managed wild grasslands and the planting of native shrubs/trees to contribute to a well-designed and beautiful place in accordance with the Framework.

Figure 5: Constraints Plan

Key

-  Site Boundary
-  Existing Woodland, Tree Groups and Hedgerows Providing Screening of Views Towards the Site
-  Existing Individual Trees
-  Existing Built Form
-  Public Rights of Way
-  Established Permissive Footpaths
-  Potential Roman Road
-  Area of Standing Water
-  Visually Sensitive Edge
-  Potential View Towards the Site
-  Approximate High Points Within the Site

General Notes

- Drawing is for illustrative only, to be evolved as part of design development.
- To be read in conjunction with Strategic Masterplan Report, prepared by Enzygo.
- Do not scale from drawing.



Alternative Masterplan

Taylor Wimpey is currently investigating the potential to include additional areas of land within the proposed masterplan for Clent View Road. The Alternative Masterplan includes these additional areas. As these areas would effectively provide development in areas surrounded by the land being promoted, or between this land and the existing urban area, they are not considered to perform any significant additional Green Belt role and are therefore suitable for release.

These additional pieces of land would provide approximately 150 additional dwellings within a network of high-quality greens, routes and open spaces which would integrate with and connect to the wider development area. Existing tree belts and hedgerows to boundaries would be retained and enhanced to further improve containment and mitigate visual impact and would provide a well-connected and comprehensive greenspace network as part of the overall scheme. The additional open space brought forward in these areas would provide further recreational and placemaking opportunities within the site.

The Alternative Masterplan also identifies a 'Potential Expansion Site' to the west of the masterplanned area which measures 24ha in area. The potential to acquire and develop this land is also being investigated by Taylor Wimpey.

This land is well contained by existing permanent defensible boundaries which are capable of preventing urban sprawl and preventing encroachment into the wider countryside. An access road lined by established boundary hedgerows runs to the north and a thick belt of woodland planting at Bunkers Hill Woods to the west and south. The land would be contained by development on the Clent View Road site to the east. The future development of the site would not result in merging of settlements. It would retain a significant gap of approximately 2.3km between Stourbridge and Kinver and a gap of approximately 4.9km between Stourbridge and Kidderminster. This land does not affect the setting and special character of a historic town and therefore does not contravene this purpose. The release of this land from the Green Belt would not prevent the recycling of derelict land and other urban land within South Staffordshire or Dudley, as insufficient previously developed land and land in the urban area is available to meet future housing requirements.

It is considered that this land would form a logical future phase of development once the masterplanned area is completed and could potentially come forward for release towards the end of the Plan period or be identified as Safeguarded Land to meet needs beyond the plan period.



Figure 6: Alternative Masterplan



Key		
	Site Boundary	
Existing Features		
	Existing Woodland, Tree Groups and Hedgerows <i>(Identified from OS Mastermap and Topographic Survey)</i>	
	Existing Individual Trees <i>(Trees of potential value and should be retained as part of development, as shown on Topographic Survey)</i>	
	Adjacent Built Form	
	Approximate Spot Height (meters AOD)	
Existing Circulation		
	Public Rights of Way <i>(Including South Staffordshire District Authority and Dudley Borough Council definitive maps)</i>	
	Established Permissive Footpaths <i>(Referred to as 'Roman Road', and marking the edge of Stourbridge)</i>	
Potential Heritage Assets		
	Potential Roman Road <i>(As identified on OS mapping data. This should be incorporated into any scheme, providing sustainable links across the site and linking with wider networks)</i>	
Proposed Access & Circulation		
	Main Site Access <i>(Green gateway into site)</i>	
	Pedestrian Access <i>(Pedestrian only access, utilising existing desire lines and linking to local footpath network)</i>	
Proposed Potential Development		
	Potential Developable Areas	
	Open Greenspace	
	Potential Play Location <i>(LEAP / Trim Trail / MUGA)</i>	
	Potential SuDS Attenuation Areas <i>(Likely areas to utilise for Attenuation, based on topography. May include various features and techniques (subject to further study and design))</i>	
	Green Buffers and Screening <i>(Proposed to maximise screening of the potential development and provide effective buffers to mitigate against potential encroachment of the greenbelt)</i>	
Potential Land Acquisition		
	Potential Land Acquisition Areas	
General Notes		
<ul style="list-style-type: none"> • Drawing is for illustrative purposes only, to be evolved as part of design development. • To be read in conjunction with Strategic Masterplan Report. • Do not scale from drawing. 		



6.0

Can the Vision be Delivered?



6.0 Can the Vision be Delivered?

Is the site available?

The proposed allocation and development of the Site:

- Will make a valuable contribution towards meeting the quantitative and qualitative needs of the community for market and affordable housing. It could deliver a up to 400 high quality family houses.
- Is being promoted by a national housebuilder, Taylor Wimpey, who can deliver the proposed residential scheme. Taylor Wimpey is seeking to commence development as soon as the Site is allocated.
- Is not subject to any known constraints that would impede deliverability. There are no legal impediments, or any need for land in third party ownership. The Site is therefore fully deliverable.

Is the site suitable?

- The Site is located to the west of the residential area of Stourbridge in close proximity to a number of services and facilities in Stourbridge. Schools, shops, residential communities, and leisure facilities are all accessible by a choice of means of transport, including walking and cycling.
- Stourbridge Town Centre is approximately 30 minutes walking distance from the northwest of the site where access to Stourbridge Town railway station is also available. Stourbridge Junction rail station is located approximately 3km from the proposed site and provides regular services to nearby and well-connected stations including Birmingham New Street, Kidderminster, Solihull, Worcester Shrub Hill, and Stratford-Upon-Avon.
- The site is situated is situated 0.4km from Shenstone Avenue bus stop, which provides regular services to the centre of Stourbridge and Dudley.
- Stourbridge is identified within the adopted BCJCS as a Town Centre, which provide for convenience shopping as well local comparison shopping opportunities, local services and local leisure facilities, and are key areas in the settlement hierarchy below Strategic Centres. The provision of housing to maintain Stourbridge's role is the settlement hierarchy of Dudley and the wider Black Country is important.
- The land also benefits from clear, well-defined boundaries and it is considered that its allocation and future development will not have a detrimental impact on the form and character of the settlement. The allocation and development of the Site provides an opportunity to create a long term defensible boundary to Stourbridge and the provision of housing development for South Staffordshire and Dudley.





Is the development achievable?

- The Framework [Annex 2] states that for a Site to be achievable there should be a reasonable prospect that housing will be delivered on the land within five years.
- Taylor Wimpey has undertaken an evaluation of the technical and environmental constraints that could prevent or restrict the development of the land. This work has identified that there is no overriding constraint that will impede its delivery.
- The site is not within a Conservation Area and there are no listed buildings within or around the site. The site is situated in Flood Zone 1.



Is the Development Viable?

- Taylor Wimpey has reviewed the economic viability of the proposals in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales; as well as the cost factors associated with the Site including site preparation costs and site constraints. Where potential constraints have been identified, Taylor Wimpey has considered the necessary mitigation measures and required investment in order to overcome any deliverability barriers.
- Taylor Wimpey confirms that the development of the Site is economically viable and is confident that residential development can be achieved within the first five years of the plan period.
- The Site is under the control of a major housebuilder. It is not subject to any significant technical or environmental constraints that will prevent it coming forward for housing.



The Site is under the control of a major housebuilder. It is not subject to any significant technical or environmental constraints that will prevent it coming forward for housing.





7.0

**Does the Scheme
Represent Sustainable
Development?**



7.0 Does the Scheme Represent Sustainable Development?

Sustainable Location

A key element of national and local policy is to ensure new developments are located in areas where alternative modes of travel are available. It is also important to ensure that developments are not isolated but are located close to complementary land uses.

The Site will form a sustainable urban extension to Stourbridge and benefits from being in close proximity to a range of local services and facilities together with employment and education opportunities. This Vision Statement demonstrates the level of accessibility provided by sustainable modes of transport, including pedestrian and cycle infrastructure and public transport. These provide good, sustainable links to key services and facilities in the surrounding area.

These services are illustrated by the Sustainability Plan, and include the following:

- Gig Mill Primary School
- Ridgewood High School
- Stanley Road Playing Fields
- Stourbridge Lawn Tennis and Squash Club
- Co-op Convenience Store
- Post Office
- The Greyhound Pub
- The Broadway Pharmacy
- Norton Medical Practice

Sustainable Development

The Framework explains that the purpose of planning is to help achieve sustainable development. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

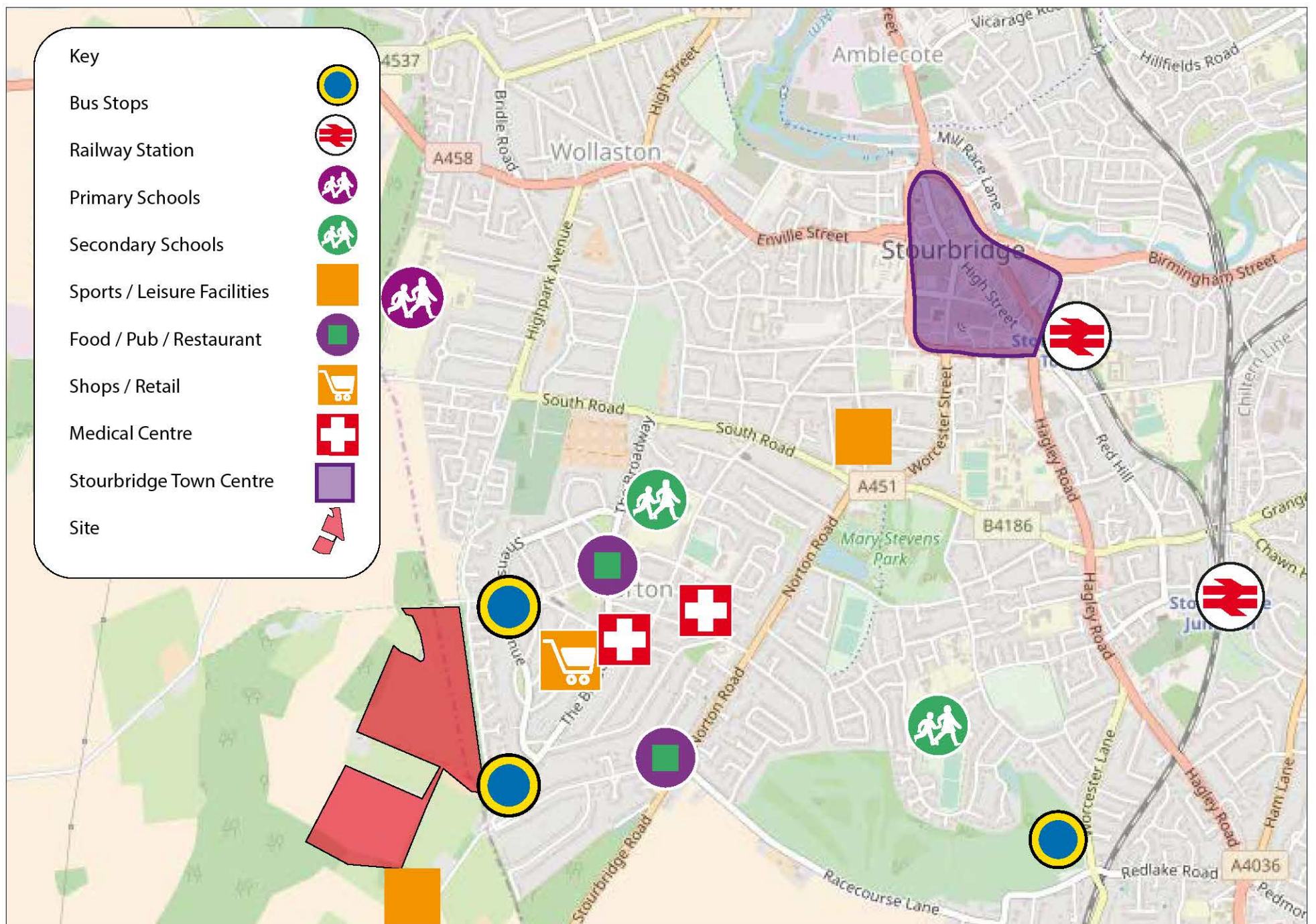
- **Economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available.
- **Social role** – supporting strong, vibrant and healthy communities.
- **Environmental role** – contributing to protecting and enhancing our natural, built and historic environment.

The future development of the Site will have positive economic, social and environmental benefit and therefore constitutes sustainable development in accordance with paragraph 7 of the Framework.





Figure 7: Sustainability Plan



Economic Benefits

Up to 400 new homes offers the opportunity for economic growth, will assist in meeting South Staffordshire and Dudley's objectively assessed housing need and add to the local authority's revenues.

Economic Role

The development of the Site will contribute towards building a strong, responsive and competitive economy. The proposal will bring a number of economic and fiscal benefits in terms of job creation, additional monies to the Local Authority and increased expenditure in the economy.

The Site is sustainably located in close proximity to a designated Town Centre. The delivery of high-quality housing in the locality will contribute to ensuring that population growth is focused in an area close to employment opportunities, which can be easily accessed via a sustainable transport network.

Housing supply also plays a key role in the flexibility of the local labour market which itself is an important component in local economic competitiveness. A shortage of housing or lack of affordability can act as a barrier to people accessing employment opportunities or result in long distance commuting with adverse transport and environmental impacts. The development will assist in addressing this, and will also provide numerous construction benefits, seeking to use local construction firms and suppliers where possible to create jobs for the local economy.

Social Role

The development of the Site will support the creation of a strong, vibrant and healthy community by increasing the supply of housing in a sustainable location. The proposed development will comprise a high-quality built environment and has been designed to meet the needs of the area and complement the character of the surroundings.

The revised Framework places particular emphasis on the following social aspects of sustainable development:

- Ensuring a strong mix of housing is provided, to ensure inclusive growth and enable all groups of the population have access to appropriate housing which directly meets their needs;
- Delivering housing in the right places to ensure communities have access to employment and local facilities and services; and,
- Ensuring the development of high-quality, distinctive and well-designed places which create a sense of place within the community.

The proposals respond effectively to these objectives outlined by national policy. The future development of the Site will:

- Provide a suitable range of dwellings in various types, sizes and tenures to meet the needs of the local population, and establish a mixed and sustainable community;
- Deliver units as affordable housing to meet identified local need;
- Provide opportunities for residents to work in surrounding areas, including Stourbridge Town Centre, utilising the Site's sustainable location and excellent connectivity via surrounding networks;
- Facilitate the use of non-car modes of transport, especially cycling and walking; and
- Provide public open space for both existing and future residents.

Environmental Role

The Site is currently in agricultural use and is considered to be of limited ecological value.

Although the proposed development will involve the loss of greenfield land, the proposals will provide numerous compensatory improvements, and seek to retain, enhance or mitigate the existing ecological and environmental features of value on the Site. Existing hedgerows and trees will be retained and incorporated where possible within the proposed development supplemented with further woodland planting to help screen the site and integrate it with surrounding assets such as Iverley Heath and Bunkers Hill Woods. The site extent allows the opportunity to provide wide-ranging enhancements to demonstrate a 'biodiversity net gain'.

The proposed scheme includes provision of Public Open Space, in the northern, central and southern parts of the site incorporating areas of attenuation. The scheme also includes areas of open space along the boundaries and responds to the environmental features adjacent to the borders of the Site with appropriate landscaping.

Stourbridge is identified as a Town Centre within Dudley and includes a range of employment opportunities, as well as retail, education and other services that serve a wide area. The Site also benefits from excellent public transport links and connectivity to the strategic road network.

The Site is sustainably located on the edge of an established settlement. Local services and amenities are well situated in Stourbridge. All facilities are within suitable walking distances (up to 2km walking distance). Existing public transport services close to the Site serve a wide area and allow for the opportunity to utilise sustainable methods of transport.

No environmental constraints have been identified that would inhibit the future allocation and development of the Site.

The proposed development will meet the Government's objectives for sustainable development by providing significant economic, social and environmental benefits.

Figure 8: Economic Benefits

The proposed development will provide 400 new homes, stimulate economic growth, assist in meeting South Staffordshire's and Dudley's housing requirements and add to the authorities' revenues.



The proposal



400 New homes (Affordable homes in accordance with policy requirements)

Construction benefits



Operational and expenditure benefits



Local Authority revenue benefits





8.0 Summary





8.0 Summary

The Clent View Road, Stourbridge Site should be removed from the Green Belt and allocated for housing. This Delivery Statement has clearly demonstrated that the Site represents an excellent opportunity to deliver a sustainable residential development.

Suitable

South Staffordshire Council and the Black Country Authorities have indicated that exceptional circumstances exist to justify the release of land from the Green Belt:

- There is inadequate land within the urban area to meet emerging housing needs. In addition, the draft BCP fails to identify sufficient land to meet the minimum local housing need of 76,076 homes. Further Green Belt release is necessary in order to address the shortfall of 28,239 homes identified. This is even before the very significant unmet need in Birmingham is taken into account, which will necessitate even higher levels of provision in HMA districts such as South Staffordshire.
- Land will need to be removed from the Green Belt and safeguarded to meet development needs beyond the plan period. The Site should be allocated for residential development.
- The Site is predominantly contained by development and strong boundaries. The allocation and future development of the Site provides an opportunity to create a long-term defensible boundary to Stourbridge.
- It is anticipated that the Black Country Plan review and the South Staffordshire Local Plan review will be completed by 2024. The Clent View Road Site should be allocated for residential development to meet needs from 2024.

Sustainable

The allocation and future development will:

- Provide a catalyst for economic growth providing significant economic, social and environmental benefits to the residents of South Staffordshire and Dudley.
- Meet the Government's objective for creating sustainable development.

Deliverable

The Site is:

- Not the subject of any technical or environmental constraints that would prevent it coming forward for housing development.
- Under the control of a major house builder. If the Site is allocated, Taylor Wimpey will bring forward housing development on the Site over the next 5 years.

Exceptional circumstances exist to justify the release of the Site from the Green Belt. There is an acute need for housing in the Black Country and South Staffordshire and further Green Belt release is required. This is even before the very significant unmet need in Birmingham is taken into account, which will necessitate even higher levels of provision in HMA districts such as South Staffordshire. The Site no longer serves the purposes of the Green Belt as set out in the National Planning Policy Framework. Removing the Site from the Green Belt will have limited impact on urban form and landscape character. The Site should be allocated for housing in the emerging South Staffordshire Local Plan and BCP to deliver much needed housing.

Taylor
Wimpey

**Land at
Clent View
Road,
Stourbridge**

Vision Statement

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