

SOUTH STAFFORDSHIRE LOCAL PLAN PREFERRED OPTIONS NOVEMBER 2021

LAND AT WOOD HAYES ROAD, WOLVERHAMPTON

TAYLOR WIMPEY UK LTD

**Taylor
Wimpey**

**TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012**



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CONTENTS:

Page No:

1.0	Introduction	1
2.0	What Does the Local Plan Need to Consider?	3
3.0	Development Strategy	8
4.0	Site Allocations	13
5.0	Development Management Policies.....	15
6.0	Sustainability Appraisal	28
7.0	Land at Wood Hayes Road, Wolverhampton.....	34
8.0	Conclusion	37

APPENDICES:

Appendix 1: Site Location Plan

1.0 Introduction

1.1 This representation is made by Pegasus Group on behalf of Taylor Wimpey UK Ltd ('Taylor Wimpey') to the South Staffordshire Local Plan Review ('LPR') Preferred Options Consultation ('the Consultation'). The consultation is progressed under 'Regulation 18' of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 This representation relates to Land at Wood Hayes Road, Wolverhampton, which Taylor Wimpey is promoting for residential development. A Site Location Plan is included at **Appendix 1** to this Representation. This land is located in immediate proximity to the draft 'Fallings Park' Strategic Allocation contained within the emerging Black Country Core Strategy Review (Policy CSA2). The Site is also located in close proximity to land which is identified through draft Policy SA3 of the South Staffordshire District LPR as Strategic Housing allocation '*Land at Linthouse Lane*', which Taylor Wimpey is also promoting as land to be released from the Green Belt and developed for a residential-led scheme.

1.3 These representations respond to the following documents, including addressing the questions set out within the LPR Consultation Document:

- Sustainability Appraisal of the South Staffordshire Local Plan Review – Preferred Options Plan, Regulation 18 (III) SA Report, August 2021
- Infrastructure Delivery Plan (South Staffordshire District Council) 2021
- South Staffordshire Green Belt Study – Stage 1 and 2 Report (LUC), July 2019
- South Staffordshire Landscape Sensitivity Assessment (LUC) 2019

- Rural Services and Facilities Audit (South Staffordshire Council) 2021
- Viability Assessment – Local Plan and Community Infrastructure Levy (Dixon Searle Partnership) October 2021.

1.4 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.5 The representations also give consideration to the legal and procedural requirements associated with the plan-making process.

2.0 What Does the Local Plan Need to Consider?

- 2.1 Taylor Wimpey supports South Staffordshire District Council ('SSDC') in progressing with a review of the adopted South Staffordshire District Development Plan as required by Policy SAD1 of the Site Allocations Document ('SAD') 2018. This provides the opportunity for the SSDC to comprehensively review the adopted Development Plan, including not only its own objectively assessed housing need, but also the role of the District in meeting unmet cross boundary needs from the wider Greater Birmingham Housing Market Area ('GBHMA'), including from the Black Country.

National Requirements for Plan-Making

- 2.2 Paragraph 33 of the National Planning Policy Framework 2021 ('NPPF') requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years.
- 2.3 Paragraph 24 of the NPPF also confirms that local planning authorities "*...are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.*" In the context of South Staffordshire, strategic matters can include housing, employment, infrastructure and the Green Belt.
- 2.4 Taylor Wimpey supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists with the District to guide growth to 2038 and to ensure that development is genuinely plan-led.

Evidence Base

- 2.5 Appendix A of the LPR Consultation Document sets out the range of studies which will be, or have been prepared, to evidence and justify the policies and allocations contained within the LPR.

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to.

- 2.6 Generally, the documents listed in Appendix A are considered to represent comprehensive evidence base necessary to support a local plan. It is also noted that a number of the documents have been updated in 2021, which is also supported.
- 2.7 However, concern is raised that the *Greater Birmingham HMA Strategic Growth Study*, *SSDC's Self Build & Custom Build Register* and the *Strategic Housing & Employment Land Availability Assessment ('SHELAA')* are not included, although it is noted that an updated SHELAA (2021) is available on SSDC's website. It is therefore assumed that its omission from Appendix A is a typographical error.
- 2.8 Nevertheless, the GBHMA Strategic Growth Study is a key aspect of the LPR evidence base and is a crucial piece of evidence in the context of South Staffordshire District.
- 2.9 The GBHMA Strategic Growth Study remains the latest comprehensive consideration of housing needs across the Greater Birmingham and Black Country HMA and provides a range of recommended options for meeting these needs, to be tested through individual LPA Local Plan reviews. This evidence has been subject to scrutiny as supporting evidence at the North Warwickshire Local Plan examination and provides justification for SSDC's intended contribution of 4,000 homes to assist in meeting the identified housing shortfall, as set out in draft Policy DS3.
- 2.10 Similarly, it is considered the Self Build & Custom Build Register should be identified as part of the evidence base to inform emerging policies in respect of housing needs and mix, including the level of self-build and custom-build housing that is expected to be provided on applications for residential

development.

2.11 Whilst the consultation document raises specific questions in relation to some evidence base documents, such as the Infrastructure Delivery Plan ('IDP'), it fails to ask questions in respect of others. Comment on these specific evidence base documents is accordingly contained within the following Chapters of this Representation.

Evidence Base Document	Comment within Representation
Sustainability Appraisal of the South Staffordshire Local Plan Review – Preferred Options Plan, Regulation 18 (III) SA Report, August 2021	Chapter 6
South Staffordshire Green Belt Study – Stage 1 and 2 Report (LUC), July 2019	Chapter 7
South Staffordshire Landscape Sensitivity Assessment (LUC) 2019	Chapter 7
Viability Assessment – Local Plan and Community Infrastructure Levy (Dixon Searle Partnership) October 2021.	Chapter 5

Infrastructure Delivery Plan

2.12 An IDP (2021) has been prepared to support the LPR to ensure the required infrastructure and investment needed to deliver the plan effectively is identified. The IDP should include the specific infrastructure projects needed to deliver planned growth and will be updated as the plan progresses

Question 2:

(a) Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP?

Yes/No

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

Yes/No

2.13 Taylor Wimpey supports SSDC's proposed infrastructure-led strategy which

seeks to focus development towards larger and better-connected settlements and, where appropriate, deliver new infrastructure benefits.

2.14 Development of Land at Wood Hayes Road, can facilitate significant infrastructure provision, including contributions towards infrastructure opportunities identified within the IDP.

2.15 Overall, it is considered that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP. Taylor Wimpey is committed to engaging with SSDC, the Parish Council and service providers to explore infrastructure requirements to inform future iterations of the Infrastructure Delivery Plan and the emerging proposal for Land at Cross Green.

Vision and Strategic Objectives

2.16 The LPR Consultation Document identifies a number of 'Issues and Challenges' surrounding homes and communities, economic vibrancy and the natural and built environment. The Document goes on to present a 'Vision' based upon these issues and challenges, and a number of 'Strategic Objectives' by which the Vision can be achieved.

Question 3:

***a) Have the correct vision and strategic objectives been identified?
Yes/No***

b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No

2.17 Whilst the Vision is succinct, it is not considered to be locally relevant and contains no spatially specific elements. It also seeks to 'protect and enhance' the District as it currently exists, rather than thinking forward and considering how the growth proposed within the LPR can better the District as a whole.

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- 2.18 The strategic objectives identified are also broadly supported, particularly the recognition of the requirement to make a proportionate contribution towards the unmet needs of GBHMA contained within Objective 2.
- 2.19 Overall, it is considered that the draft emerging policies will assist in delivering these objectives.

3.0 Development Strategy

Green Belt and Open Countryside

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

- 3.1 Policy DS1 is broadly in line with the relevant paragraphs of the NPPF relating to development within the Green Belt and is therefore supported.
- 3.2 The recognition within the supporting text that exceptional circumstances exist for Green Belt release within the District to allow for sustainable development within the plan period is also supported. However, this recognition should also be included within Policy DS1, with cross reference made to the relevant sites where Green Belt release is proposed.
- 3.3 Taylor Wimpey has no comment to make in respect of Policy DS2.

Housing

- 3.4 Taylor Wimpey supports the recognition at Paragraph 4.6 of the LPR that:

"A key part of the new Local Plan is to establish the role that South Staffordshire Council can play in both meeting its own housing needs and those of the wider Greater Birmingham Housing Market Area (GBHMA), which contains local authorities with significant unmet housing needs (Birmingham and the Black Country)."

Spatial Strategy to 2038

Question 5: Do you support the policy approach in Policy DS3 – The

Spatial Strategy to 2038? Yes/No If no, please explain how this policy should be amended?

- 3.5 Policy DS3 sets out that SSDC will deliver a minimum of 8,881 dwellings, comprising 4,131 dwellings to meet South Staffordshire's own housing need using the Government's standard method across the 17-year plan period 2021-2038, 750 dwellings which have already been completed in the District in the period 2018-2021 and a further 4,000 dwellings to contribute towards the unmet needs of the GBHMA.
- 3.6 The Policy also defines a settlement hierarchy across five 'tiers', across which the housing target will be distributed.
- 3.7 Taylor Wimpey broadly supports the policy approach of Policy DS3. However, it remains a concern that the 8,881 dwellings proposed through the LPR may be insufficient, as set out below. In addition, it is submitted that the Spatial Housing Delivery Table (Table 8), should be woven into the Policy, as the settlement hierarchy currently doesn't consider locations adjacent to the Black Country Urban Area, such as Land at Linthouse Lane, as sustainable locations for growth.

Housing Requirement for South Staffordshire District

- 3.8 This is based upon the Government's Standard Method for Calculating Housing Need, which currently requires the district to deliver a minimum annual average of 243 dwellings per annum ('dpa'), based upon a baseline figure of 195 dpa and the 2020 affordability ratio of 7.88 (released March 2021)¹.
- 3.9 Nonetheless, Planning Practice Guidance ('PPG') is clear that the figure produced by the Standard Method represents a *minimum* figure, rather than

¹ Whilst the Strategic Housing Market Assessment ('SHMA') identifies a minimum housing requirement of 254 dpa, it is acknowledged that this is based upon the 2018 affordability ratio of 7.39 and is therefore out of date.

a requirement².

- 3.10 PPG provides a non-exhaustive list of examples whereby additional growth beyond the minimum requirement may be appropriate, including relevant growth strategies for the area, strategic infrastructure improvements or accommodating unmet need from neighbouring authorities³.
- 3.11 Other circumstances that should be considered in respect of South Staffordshire District include the balance between homes and jobs created over the plan period.
- 3.12 These circumstances are considered in further detail below.

Unmet Housing Needs from the Wider Housing Market Area

- 3.13 The recognition of the significant housing shortfall arising from Birmingham City and the Black Country at paragraphs 4.8-4.9 of the Consultation Document is supported.
- 3.14 The 37,900-home shortfall arising from within Birmingham has been tested and confirmed at examination, whilst the Black Country Authorities have produced the Draft Black Country Plan 2018-2039, which subject to consultation in 2021, which concluded that the amount of housing need which cannot be accommodated in the Black Country amounts to around 28,239 homes to 2039.
- 3.15 It is important to stress that these shortfall figures do not take into consideration the 35% uplift applied to Birmingham introduced in December 2020, as the adopted Birmingham Development Plan pre-dated this. The overall unmet housing need figure arising from the GBBCHMA is therefore well in excess of 66,000 homes.

² Paragraph: 002 Reference ID: 2a-002-20190220

³ Paragraph: 010 Reference ID: 2a-010-20201216

3.16 The LPR Consultation Document sets out that, in order to contribute towards meeting this shortfall, SSDC will "test" for the delivery of an additional contribution of 4,000 dwellings through the LPR, based on the scale of growth implied in the district by the strategic locations identified in the GBHMA Strategic Growth Study⁴ ('SGS').

3.17 The principle of this contribution is supported by Taylor Wimpey, although SSDC should continue to co-operate with other authorities within the GBHMA to ensure that the level of the contribution made by each Authority is sufficient to collectively meet the significant shortfall discussed above.

Economic Uplift

3.18 The SHMA sets out the broad economic consequences of the projected growth in Chapter 5. However, the SHMA fails to consider the impact of committed development at the West Midlands Interchange ('WMI'), which is projected to create around 8,500 new jobs, well in excess of the increased in the working age population between 2018 and 2038 identified by the SHMA (3,489 people).

3.19 In addition, significant jobs growth will be provided through committed strategic employment developments planned at i54 and ROF Featherstone.

3.20 At present, the SHMA fails to consider whether the minimum local housing need figure derived from the standard method (243 dpa equating to 4,131 dwellings) would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth, even taking into consideration the 4,000 additional homes to meet unmet needs in the wider GBHMA.

3.21 Further evidence is necessary to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand. This may require an uplift in local housing needs identified.

⁴ Greater Birmingham HMA Strategic Growth Study (GL Hearn) 2018

Spatial Strategy

- 3.22 SSDC previously consulted on a Spatial Housing Strategy and Infrastructure Delivery (SHSID) document in October 2019. This looked at how the proposed housing target could be distributed between different settlements and other broad locations within the District.
- 3.23 Taylor Wimpey supports the distribution of housing growth through the identification of strategic sites close to the Black Country and proportionate growth focused to the villages.
- 3.24 Taylor Wimpey particularly supports the allocation of Land North of Linthouse Lane, which is comprises Strategic Development Location SA3. This allocation not only assists in providing improved infrastructure but also has due regard to where housing needs exist, including within locations close to the Black Country conurbation where a 28,239-home shortfall in provision has been identified.

Longer Term Growth Aspirations for a New Settlement

- 3.25 Policy DS4 sets out an aspiration for SSDC to deliver a new settlement to be delivered beyond the plan period. A broad location comprising the transport corridor formed by the A449 and West Coast Mainline between Wolverhampton and Stafford has been identified as a potential area of search for such proposals.

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

- 3.26 Taylor Wimpey has no comment to make in respect of Policy DS4, other than to agree that such an option would not contribute to housing growth during the proposed plan period to 2038.

4.0 Site Allocations

Strategic Masterplanning Locations

4.1 Taylor Wimpey has a number of land interests within South Staffordshire District. This Representation relates to Land at Linthouse Lane and should be read in conjunction with other representations submitted on behalf of Taylor Wimpey.

Question 7:

a) Do you support the proposed strategic housing allocations in policies SA1-SA4? Yes/No If no, please explain your reasons for this.

b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code? Yes/No

4.2 Taylor Wimpey supports the proposed identification of strategic housing allocations at Cross Green (ref: SA2) and at Land North of Linthouse lane (ref: SA3).

4.3 Taylor Wimpey also supports the inclusion of site-specific policies to establish a vision for each site, alongside a requirement for a detailed masterplan and design code. The key infrastructure and design requirements listed within the Policies are helpful in informing the masterplan and design code.

Housing Allocations

Question 8: Do you support the proposed housing allocations in Policy SA5? Yes/No Please reference the site reference number (e.g site 582) for the site you are commenting on in your response.

4.4 This representation relates to Land at Wood Hayes Road, which Taylor

Wimpey submits is a suitable site to allocate through Policy SA5 due to its location immediately adjacent to the draft 'Fallings Park' Strategic Allocation contained within the emerging Black Country Core Strategy Review (Policy CSA2).

- 4.5 Further information in respect of this site is included within Chapter 7 of this Representation.

5.0 Development Management Policies

5.1 Chapter 6 of the LPR sets out a number of preferred approaches to policies against which planning applications will be determined. At this stage, these preferred approaches do not reflect the final policy wording that will be included in the Local Plan Review that will be submitted to the Secretary of State. Instead, they are intended to highlight key requirements, aims and measures that the final submitted policies will deliver, focusing on the most important parts of the future policies to seek views on these.

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

Policy HC1 – Housing Mix

5.2 Whilst it is recognised that the Policy contained within the LPR Consultation Document is not a 'final' version of the intended Policy, it is nevertheless submitted that the final wording should be flexibly worded to allow for appropriate application across the differing settlements and locations across the District, as appropriate.

5.3 At present, the Policy requires 'major development' to provide:

- 75% of market homes to have 3 bedrooms or less, with specific breakdown to be determined with reference to latest Housing Market Assessment; and
- Specific breakdown of affordable housing to be determined with reference to latest Housing Market Assessment and other affordable housing needs evidence

- 5.4 This wording is not sufficiently clear or flexible. It is not clear whether applications will be expected to strictly accord with the evidence presented in the SHMA, or simply have 'reference' to that evidence.
- 5.5 It is submitted that it is most appropriate for housing mix to be guided by market signals as reflected in the most up-to-date assessment of needs. Such assessments will need to be updated over the course of the Plan period. The requirement that 75% of properties comprise of three-bedrooms or less is restrictive and does not afford the flexibility required for the reasons set out above.
- 5.6 The policy should also comment that it is subject to viability assessment, thus allowing for flexibility in its application.
- 5.7 Lastly, 'Major development' is defined by footnote 11 of the LPR which states that:

"Major residential development is defined in the 2019 National Planning Policy Framework as "development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more" [NB this definition is carried through to the 2021 version of the NPPF].

- 5.8 Whilst a definition of major development ***is*** contained within the NPPF, the statutory definition is actually contained within the Town and Country Planning Development Management Procedure Order, which defines major development as where:

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

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

- 5.9 The text emphasised above is an important qualifier when considering whether or not a proposal constitutes major development. This qualifying text has not been carried through into the definition contained within the NPPF. It is submitted that the definition in the DMPO should be referred to within the LPR for the avoidance of doubt.

Policy HC2 – Housing Density

- 5.10 Policy HC2 currently sets out an aim to achieve a minimum net density of 35 dwellings per net developable hectare in developments "*within or adjoining Tier 1 settlements, in infill locations within the development boundaries of other settlements in the district or in urban extensions to neighbouring towns and cities*".
- 5.11 The objective of achieving an efficient use of land on development sites is supported. However, the policy should be drafted to recognise that a blanket approach to density is unlikely to be effective as this will vary between individual sites depending on specific site constraints and opportunities. Furthermore, it is considered that this wording does not provide direction as to what is expected of developments adjacent to settlements within Tiers 2-5 of the Settlement Hierarchy, which should be corrected.

Policy HC3 – Affordable Housing

- 5.12 Policy HC3 requires proposals for major residential development to provide 30% of all dwellings to be affordable housing, broken down using the following ratio:
- 50% social rent,
 - 25% shared ownership, and
 - 25% first homes
- 5.13 The require for 30% affordable housing appears to be broadly supported by

the Viability Study⁵ which confirms that affordable housing within the range of 20-30% is potentially relevant to strategic housing sites overall, assuming a maximum of £9,200/dwelling S106 costs and no additional CIL contributions.

5.14 It is recognised that a Stage 2 Viability Assessment will be undertaken once more refined and bespoke assumptions regarding infrastructure and development costs are known. It also is understood that the Infrastructure Delivery Plan will continue to be evolved and refined as the Local Plan review progresses.

5.15 Taylor Wimpey would welcome the opportunity to engage with the Council and the appointed viability consultants prior to the publication of the Stage 2 Assessment.

5.16 The requirement to 'pepperpot' affordable housing in clusters across the development is generally supported. However, the policy should recognise that for management purposes, Registered Providers do require a degree of clustering of affordable housing within a development and this will inform site layouts.

5.17 Policy HC3 also suggests it would not support grant funding for homes to be provided under the requirements of the Policy. It is submitted that the funding mechanisms for the delivery of affordable housing is not a planning matter and is therefore beyond the remits of a Policy to control. This text should accordingly be removed.

Policy HC4 – Homes for Older People

5.18 Policy HC4 requires major development to:

"...make a clear contribution to meeting the needs of the district's

⁵ Viability Assessment – Local Plan and Community Infrastructure Levy (Dixon Searle Partnership) October 2021.

ageing population, through the provision of either: general needs properties for older people e.g. bungalows, other ground floor accommodation with appropriate age restrictions on occupation; or specialist housing e.g. sheltered, extra care homes.

30% of all market and affordable homes to meet Building Regulations Standard Part M4(2) – Accessible and adaptable dwellings."

- 5.19 The above policy wording does not define 'older people', so it is unclear as to exactly who this Policy is targeting or who would be eligible to occupy such dwellings.
- 5.20 It also is also unclear as to the level of bungalows or other ground floor accommodation that development is expected to provide. This should be quantified to ensure less scope for unnecessary discussions between developers and SSDC at a later stage in the application process. It is not clear if this policy intends to continue to SSDC's current approach of requiring 10% of all homes to be delivered as bungalows or other ground floor accommodation.
- 5.21 The policy also sets out that 30% of all market and affordable homes should meet Building Regulations Standard Part M4(2) Accessible and adaptable dwellings. These requirements are optional within Building Regulations and are described as making "*reasonable provision for most people to access the dwelling and incorporate features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users.*" It is recognised that the older person population is likely to increase over the plan period, however an ageing population affects the whole country and is not an issue specific to South Staffordshire. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case.

5.22 Furthermore, the SHMA identifies a need for 1,783 accessible and adaptable general homes for those over 65 years and 1,235 for those under 65 years, across the Plan Period. This equates to less than 30% of the overall housing requirement to be delivered by this Plan (Table 8 of the LPR identifies a supply of 10,034 dwellings). It is therefore not clear how the 30% requirement within the Policy has been arrived at or how this is justified. The requirement to provide a proportion of dwellings to meet Part M4(2) may be justified but it would not be appropriate to include both this requirement and a requirement to provide bungalows or other ground floor accommodation.

Policy HC7 – Self & Custom Build Housing

5.23 Policy HC7 requires sites for major residential development to "*...have regard to any need identified on the self-build and custom housebuilding register, with provision to be agreed on a site-by-site basis.*"

5.24 This approach is generally supported. The imposition of a District-wide percentage requirement would not be supported, as it would likely result in the over-provision of self-build and custom-build housing within the District.

5.25 It is nevertheless submitted that the above Policy should include a mechanism to allow for such plots to come forward for market housing if demand is subsequently found to be absent. For example, if serviced plots for self-build and custom housebuilding have been made available and marketed for 12 months and have not sold, plots can be used for delivery of general market housing.

Policy HC9 – Design Requirements

5.26 Taylor Wimpey supports the introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance.

5.27 However, the requirement to provide tree lined streets should only be in

instances where the locations are agreed by the highway authority. Local highway authorities often do not want trees in immediate proximity of the street due to management concerns or liabilities.

- 5.28 The utilisation of design codes is supported, but only where they are commensurate with the scale of development proposed. In general, it is expected that they be limited to strategic level sites.

Policy HC11 – Space about dwellings and internal space standards

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

- 5.30 The requirement that all dwellings should meet Nationally Described Space Standards is not supported. National Planning Guidance Housing: optional technical standards (paragraph 020) clearly states that *"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- *Need – evidence should be provided in the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *Viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *Timing – there may need to be a reasonable transition period*

following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”

5.31 It is clear that the introduction of the NDSS requires a Local Plan policy which has been fully evidenced, justified and viability tested. The Strategic Housing Market Assessment (SHMA) makes reference to the NDSS (paragraph 7.35) only in the context of assessing the need for accessible and adaptable homes. the SHMA does not provide any justification or evidence for requiring NDSS in the District.

5.32 If NDSS is subsequently justified and pursued, the policy should be sufficiently flexible to recognise that well-designed housetypes which fall slightly below will be acceptable, particularly on sites where the majority of the dwellings comply. The policy should also make provision for additional flexibility in relation to affordable housing as many registered providers have their own requirements.

Policy HC12 – Parking Standards

5.33 The continuity of existing parking standards is supported.

5.34 In respect of EVCPs, The Department of Transport Consultation Response: Electric Vehicle Charging Points (EVCP) in Residential & Non-Residential Buildings dated November 2021 sets out that from June 2022 new dwellings with associated parking will have at least 1 EVCP per dwelling. Therefore, it is no longer necessary for the Council to have a proposed policy requirement for EVCPs.

5.35 It is also noted that the Council’s Viability Assessment includes a cost of only £500 per EVCP. This cost is below the Government’s cost estimate and excludes any costs for upgrading local networks. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated a cost of £974 per EVCP plus an automatic

levy for upgrading networks capped at £3,600. This should inform the Stage 2 Viability Study.

Policy HC14 - Health Infrastructure

- 5.36 The policy objective of ensuring development does not result in an unacceptable impact on health infrastructure is supported. It is suggested that SSDC should engage with the CCG now regarding proposed allocations to refine the approach to infrastructure contributions and include this as part of the IDP. Any infrastructure contributions will be required to meet the CIL tests. This approach ensures that all likely costs associated with the proposed allocations are known, thus allowing for an informed view as to their viability.

Policy HC15 – Education

- 5.37 The policy approach is generally supported although, again, it is suggested that SSDC should engage with SCC Education and include relevant infrastructure requirements as part of the IDP, to ensure that all costs associated with allocations are known.

Policy HC17 – Open Space

- 5.38 The policy requirement for on-site equipped play provision as default is not supported as it will not be appropriate for every site, for example where there is already high-quality equipped play provision in the locality it would not make sense to duplicate this provision. In addition, it is not appropriate to require open space to be centrally located on all sites. The policy should take a more flexible approach to achieve the right design solution for each site.
- 5.39 In addition, the exclusion of small incidental green infrastructure (GI) without a clear recreational purpose from on-site open space provision is not supported. The policy text cites landscape buffers as an example of incidental GI which may be excluded. This is not appropriate as landscape buffers can

be of a significant size and clearly make a contribution towards open space provision on a site. They should therefore be included in these calculations.

- 5.40 Clarification should also be provided as to whether features such as attenuation basins are considered to be 'incidental'.

Policy HC18 – Sports Facilities and Playing Pitches

- 5.41 Policy HC18 requires major developments to determine required provision through use of the latest Playing Pitch Calculator and Sports Facilities Calculator provided by Sport England, informed by the recommendations of both the Indoor Sports Facilities Strategy 2020 and the Playing Pitch Strategy 2020. Further guidance on the procedure for determining provision required from new development will be set out in an Open Space, Sport and Recreation SPD.

- 5.42 This policy is noted, although it is submitted that it would be more appropriate for SSDC to define standards expected from development as part of policy (as per the open space standard defined by Policy HC17, for example). This approach provides greater certainty in respect of the infrastructure delivery requirements expected from sites, which ultimately impacts upon their viability. The level of provision expected, and the associated viability implications should be considered within both the IDP and viability assessment.

Policy EC3 – Inclusive Growth

- 5.43 The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential units is not supported by Taylor Wimpey.
- 5.44 It is not clear how any certainty could be provided through such a Plan. It should be recognised that the business model employed by Taylor Wimpey and other major housebuilders relies upon subcontract businesses.

5.45 Despite this, construction stage opportunities include:

- Taylor Wimpey can deliver a comprehensive employment, training and skills strategy as part of the construction stage;
- The strategy can include opportunities to engage with schools and colleges; and
- Taylor Wimpey will prioritise the procurement of materials and labour locally where possible.

Policy EC9 – Infrastructure

5.46 Policy EC9 commits SSDC to work with and support infrastructure providers and also offer policy support for the delivery of infrastructure identified through the IDP. This is broadly supported, although this engagement with relevant providers should also be taking place as part of the Plan process.

Policy EC10 – Developer Contributions

5.47 Policy EC10 confirms that specific infrastructure requirements will be identified in relevant policy areas and site proformas.

5.48 Whilst this approach is supported, it is paramount that a detailed list of infrastructure requirements is included within the Publication (Regulation 19) version of the Plan, to allow for sufficient scrutiny and comment by the public and interested parties.

Policy NB1 - Protecting, Enhancing and Expanding Natural Assets

5.49 Policy NB1 is supported on the whole. However, the final sentence again refers to a requirement to provide tree lined streets. As set out above in respect of Policy HC9, tree lined streets should only be included following

detailed engagement with the local highway authority, due to the practicalities of management, maintenance and liability.

Policy NB3 - Cannock Chase SAC

- 5.50 The Local Plan Review notes that a separate suite of joint studies are being updated with adjoining authorities in relation to Cannock Chase SAC. The findings of these studies should influence the policy approach to Cannock Chase SAC and determine appropriate mitigation measures.

Policy NB6 - Energy and Water Efficiency, Energy and Heat Hierarchies and Renewable Energy in New Development

- 5.51 The aspirations of this policy to reduce carbon emissions is generally supported. The policy should nevertheless confirm the threshold at which developments are expected to submit an energy statement as part of any application for planning permission.
- 5.52 The inclusion of the target to achieve a 31% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L 2013 are noted. It is understood that this requirement is reflective of anticipated changes to building regulations to deliver the Government's 'Future Homes Standard'. These changes mean that, from mid-2022, new homes will have a 31% reduction in CO₂ when compared to current standards. Further changes are due in 2025 that will mean a 75% reduction in CO₂ when compared to today, along with a new focus on rating primary energy efficiency as well as CO₂.
- 5.53 The Council's proposed policy approach is unnecessary and repetitious of 2021 Part L Interim Uplift. It is the Government's intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council does not

need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.

6.0 Sustainability Appraisal

6.1 The LPR Consultation is supported by a Sustainability Appraisal, prepared by Lepus Consulting⁶ ('the SA'). The purpose of the SA is stated as being to appraise the sustainability performance of all potential site allocations for development. The potential sites are assessed in relation to each of the stated objectives in the SA Framework as follows:

- **SA Objective 1. Climate change mitigation:** Minimise the Plan area's contribution to climate change;
- **SA Objective 2. Climate change adaptation:** Plan for the anticipated impacts of climate change;
- **SA Objective 3. Biodiversity and geodiversity:** Protect, enhance and manage the biodiversity and geodiversity assets of the Plan area, including flora and fauna;
- **SA Objective 4. Landscape:** Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening its distinctiveness;
- **SA Objective 5. Pollution and waste:** Ensure sustainable management of waste whilst minimising the extent and impacts of water, air and noise pollution.
- **SA Objective 6. Natural resources:** Protect, enhance and ensure the efficient use of the Plan area's land, soils and water;
- **SA Objective 7. Housing:** Provide a range of housing to meet the needs of the community;
- **SA Objective 8. Health:** Safeguard and improve physical and mental health of residents;
- **SA Objective 9. Cultural heritage:** Conserve, enhance and manage sites, features and areas of historic and cultural importance;
- **SA Objective 10. Transport and accessibility:** Improve choice and efficiency of sustainable transport in the Plan area and reduce the need to travel;
- **SA Objective 11. Education:** Improve education, skills and

⁶ Sustainability Appraisal of the South Staffordshire Local Plan Review – Preferred Options Plan, Regulation 18 (III) SA Report, August 2021

qualifications in the Plan area; and

- **SA Objective 12. Economy and employment:** Support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.

6.2 The SA also appraises the draft development management policies and their likely outcomes.

6.3 The significance of effects is scored as follows:

Significance	Definition (Not Necessarily Exhaustive)
Major Negative --	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	The size, nature and location of development proposals would be likely to: <ul style="list-style-type: none"> • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse
Minor Positive +	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key

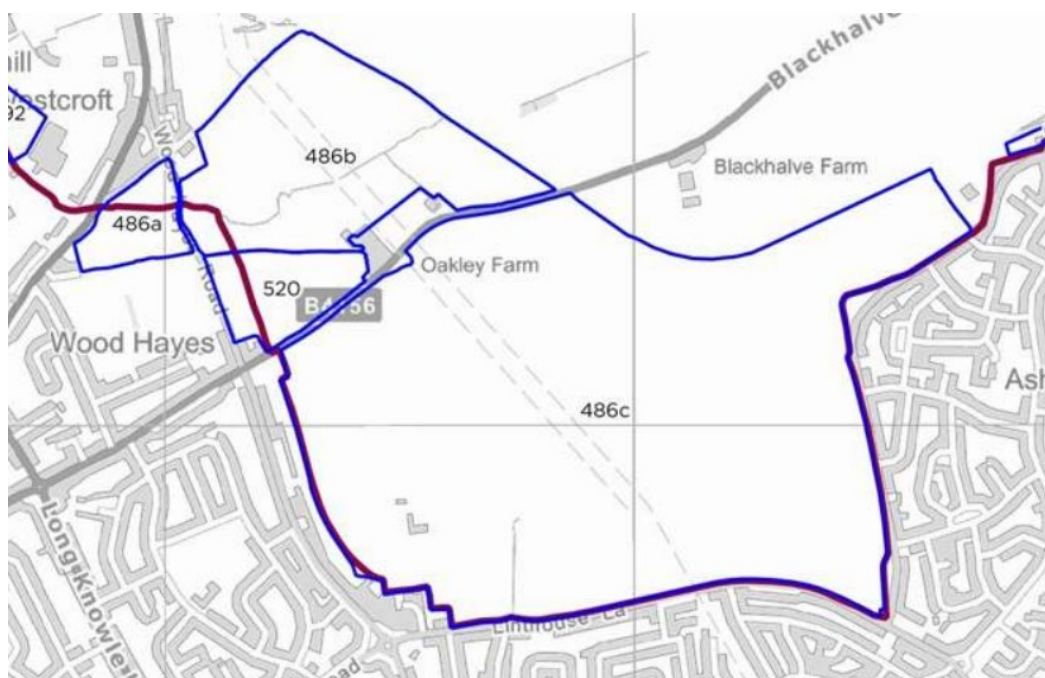
	elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.
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Table 6.1: Guide to scoring significance of effects

6.4 The SA represents an update to previous iterations of the SA which have supported previous consultation versions of the LPR.

Land off Blackhalve Lane – Site Ref: 486b, 486c

6.5 Land at Wood Hayes Road is considered within the SA as '*Land off Blackhalve Lane*' – Site Ref: 486a, as illustrated on the map extract below. It should be noted that part of parcel 486a falls within the Black Country and not South Staffordshire (land south of the purple line). This representation only concerns the land within 486a that is located to the north of the purple line i.e it falls within South Staffordshire.



6.6 The SA includes an assessment of the nature and magnitude of the impact of developing site 486a together with 486b, both pre- and post-mitigation.

These assessments are reproduced in Figures 6.1 and 6.2 below.

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
486a/b	+/-	--	-	--	-	-	+	-	-	-	--	+

Figure 6.1: Significance of effects pre-mitigation, Site Refs: 486a and 486b

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
486a/b	+/-	+	+/-	--	-	-	+	-	0	-	--	+

Figure 6.2: Significance of effects post-mitigation, Site Refs: 486a and 486b

6.7 Taylor Wimpey supports the above scoring overall, but disputes the finding that developing the site would result in a Major Negative impact upon landscape and townscape.

6.8 The SA sets out that Site 486a "...is considered by the Green Belt Study to result in 'high' levels of harm to the purposes of the Green Belt". This is factually incorrect. The Green Belt Study⁷. assesses the site as 'Sub-Parcel S28A – Wood Hayes Triangle', concluding release of any land within the sub-parcel would result in '**low-moderate**' Green Belt harm, stating that:

⁷ South Staffordshire Green Belt Study – Stage 1 and 2 Report (LUC), July 2019

"The sub-parcel makes a moderate contribution to preventing sprawl of the West Midlands conurbation at Wednesfield, to maintaining the separation between the neighbouring towns of Wednesfield and Great Wyrley, and to preventing encroachment on the countryside. The sub-parcel is adjacent to the settlement edge to the north but has strong spatial openness and a relatively strong relationship to the open countryside to the east. While the release of this sub-parcel would breach the boundary provided by Old Hampton Lane, this boundary has already been breached to the south, and **the release of this land (in conjunction with contained Black Country sub-parcels to the south) would create a simplified and more consistent Green belt boundary**". [Pegasus Emphasis]

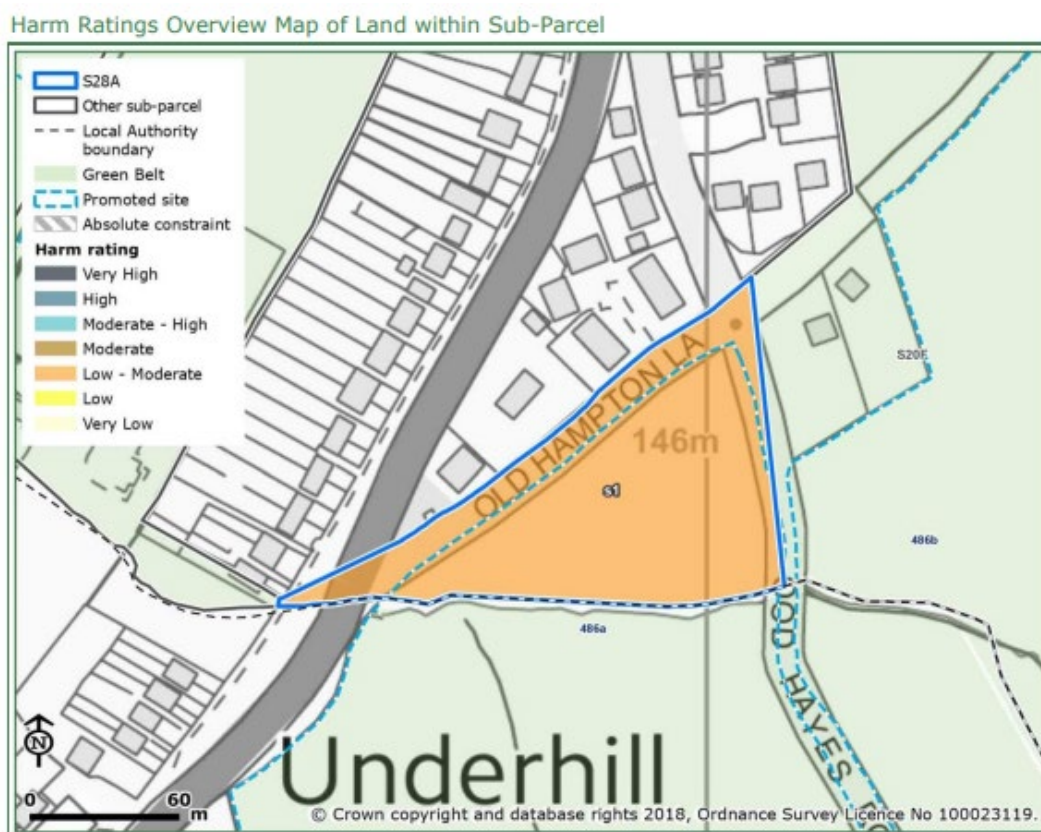


Figure 6.3: Green Belt Harm rating for Sub-Parcel S28A – Wood Hayes Triangle.

- 6.9 Taylor Wimpey supports the findings of the Green Belt study, particularly regarding the conclusion that the release of the site from the Green Belt, in conjunction with the Black Country allocation at Fallings Park, would create a more simplified Green Belt boundary.
- 6.10 In respect of other aspects within the SA, the site is found to have 'low-moderate' landscape sensitivity or a 'minor negative' impact on landscape character, views from the public right of way network, views for local residents, urbanisation of the countryside and coalescence).
- 6.11 The finding that the site would have a Major Negative impact upon landscape and townscape accordingly appears to be based upon an **incorrect** conclusion that the site would result in a 'high' level of harm to the Green Belt. Not only is this considered inaccurate regarding the summary of Green Belt impact, it also implies that the consideration of Green Belt impact carries significantly greater weight than other landscape considerations in the overall assessment of impact upon Landscape and Townscape.
- 6.12 Overall, it is considered that this reconsidered assessment would result a reduced SA impact score of Minor Negative ('-') for the site in respect of Landscape and Townscape.
- 6.13 Taylor Wimpey also disputes the Major Negative ('--') post-mitigation score attributed to Site 486a in respect of education.
- 6.14 SSDC has identified site 486c as a strategic allocation within the draft LPR. The promotional material prepared by Taylor Wimpey in support of site 486c includes land for a two-form entry primary school, which would support education provision. This would include supporting education for surrounding sites, including 486a and 486b. It is therefore contended that this mitigation is sufficient to make the overall result for site 486a Negligible ('0').

7.0 Land at Wood Hayes Road, Wolverhampton

7.1 Taylor Wimpey is currently in control of land at Wood Hayes Road, Wolverhampton, as shown on the Site Location Plan appended to this representation (see **Appendix 1**).

7.2 This land is located in immediate proximity to the draft 'Fallings Park' Strategic Allocation contained within the emerging Black Country Core Strategy Review (Policy CSA2). The Site is also located in close proximity to land which is identified through draft Policy SA3 of the South Staffordshire District LPR as Strategic Housing allocation 'Land at Linthouse Lane', which Taylor Wimpey is also promoting as land to be released from the Green Belt and developed for a residential-led scheme.

Site Description

7.3 The Site comprises approximately 1ha of land, to the west of Wood Hayes Road, east of Cannock Road (A460) and south of Old Hampton Lane. The site is currently in agricultural use and is bounded by sporadic trees and hedgerows and its north-western and eastern boundaries.

7.4 The site is located within Flood Zone 1; the area at least risk from flooding. There are no heritage assets in the immediate proximity of the site.

7.5 The site has no statutory ecological or environmental designations. The site is located within the Green Belt, which represents a policy designation.

Green Belt

7.6 As identified within Chapter 6 of this Representation, the site lies within the West Midlands Green belt, adjacent to the current built up area of Wolverhampton and within walking distance of many services, facilities and bus links.

7.7 However, the Council's Green Belt Assessment (2019) indicates that the release of the site for development would only result in 'low-moderate' Green Belt harm, acknowledging that *"...the release of this land (in conjunction with contained Black Country sub-parcels to the south) would create a simplified and more consistent Green belt boundary"*.

7.8 It is therefore submitted that the site should be released from the Green Belt and allocated for development, in conjunction with the draft Black Country allocation at Fallings Park.

Site-Specific Opportunities

7.9 The development of the site for residential purposes presents the opportunity to deliver:

- Approximately 30 dwellings, at 35dph (net);
- Conjoined approach with Black Country allocation at Fallings Park;
- A simplified and consistent Green Belt boundary, as identified by the Green Belt Assessment;
- Obligations towards the improvement of surrounding infrastructure;
- Opportunities for biodiversity net gain.

Suitability

7.10 The information set out above, read in conjunction with the appended illustrative masterplan, demonstrates that land Wood Hayes Road is a suitable site for development, which accordingly be released from the Green Belt and allocated through Policy SA5 of the LPR.

Deliverability

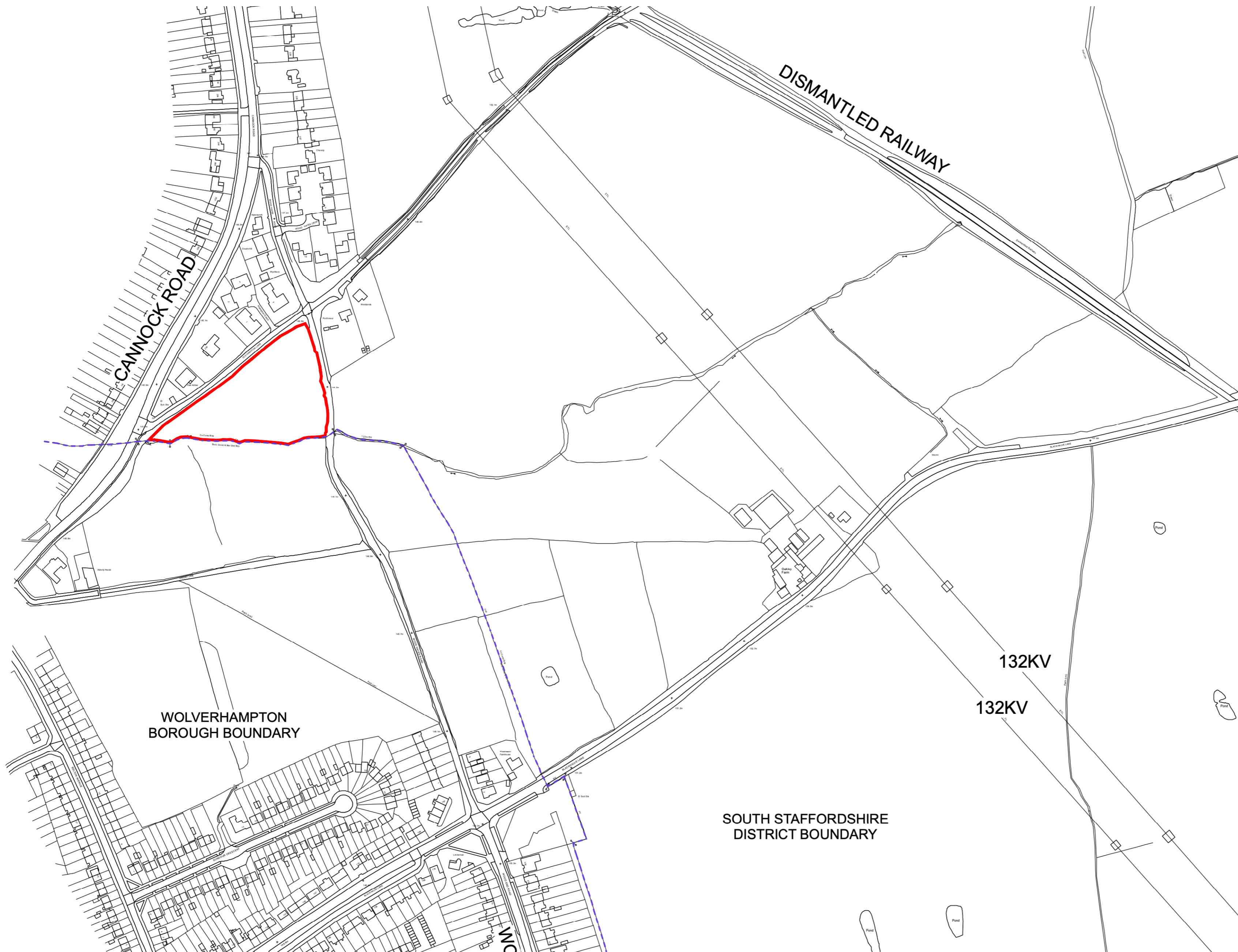
- 7.11 There is an agreement in place between the landowner and Taylor Wimpey to facilitate the development of the site.
- 7.12 A considerable amount of technical work has been undertaken to demonstrate the deliverability of Taylor Wimpey's land interests north of Wolverhampton. Taylor Wimpey can confirm that this work concludes that there are no physical or other constraints likely to render the site undeliverable within the proposed Plan period. The site is available now.
- 7.13 There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the potential impacts of the development of the site can be mitigated through design and in many cases a positive outcome can be achieved.
- 7.14 The site is deliverable and immediately available and, subject to allocation and removal of the land from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years.

8.0 Conclusion

- 8.1 This representation is made by Pegasus Group on behalf of Taylor Wimpey UK Ltd to the South Staffordshire Local Plan Review, Preferred Options (Regulation 18) consultation. This representation relates to land at Wood Hayes Road, which Taylor Wimpey is promoting for residential development.
- 8.2 Taylor Wimpey supports the LPR produced by SSDC, including the principle of contributing towards unmet development needs arising from within the GBBCHMA.
- 8.3 The information contained within this representation demonstrates that land at Wood Hayes Road is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 8.4 There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the potential impacts of the development of the site can be mitigated through design and in many cases a positive outcome can be achieved.


APPENDIX 1

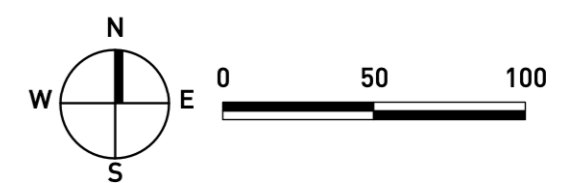
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KEY

 SITE LOCATION
0.98 HECTARES
2.41 ACRES

 BOUNDARY LINE BETWEEN
SOUTH STAFFORDSHIRE DISTRICT AND
WOLVERHAMPTON BOROUGH



WOOD HAYES ROAD, WOLVERHAMPTON - SITE LOCATION PLAN