South Staffordshire EIP - Matter 17 Response Respondent Reference AGT24- 037-05-01 - AGT24- 037-05-32

Savills on behalf of Taylor Wimpey



Matter 17 - Issue 1

Question 2.

In terms of infrastructure requirements and delivery:

- a) At an overall plan level, have the all the relevant infrastructure needs been identified, along with appropriate consideration of associated delivery risks and the mechanisms that will be used for delivery?
- b) Are the details regarding infrastructure delivery in the Infrastructure Delivery Plan consistent with the supporting evidence base?
- c) Does the Plan set out the contributions for planning obligations expected from development for infrastructure and is it in accordance with the National Planning Policy Framework?
- d) Does the Plan provide a justified, clear and sufficiently detailed approach to funding infrastructure provision?
- e) Does the Council have an adopted up-to-date Community Infrastructure Charging Schedule, and if so, does it have any implications for the soundness of the Plan?
- f) Do key infrastructure dependencies align, are they sufficiently understood and how will they be reasonably managed? If not, what are the implications for the soundness of the Plan?

The Infrastructure Delivery Plan (document reference CD11) has identified the Brinsford Park and Ride as a key infrastructure project but SSDC has not sought to ensure its deliverability within the plan period. Brinsford Park and Ride is a longstanding ambition of the Council (and wider economic area) and Core Policy 11 of the Adopted Local Plan references the delivery of 'Brinsford Strategic Park and Ride'. Without the allocation of Land at Cross Green (site references 646a and 646b), the land will not be safeguarded to facilitate the future delivery of a park and ride station. SSDC's 2024 evidence has not justified how this important infrastructure will be delivered without the Cross Green allocation.

Question 3.

In terms of how the Plan will be monitored:

- a) Do the proposed indicators provide adequate coverage across each of the policies of the Plan?
- b) Is each indicator clear, relevant and measurable in the absence of any contextual indicators, targets and triggers within the monitoring framework?
- c) Are there any barriers to securing the relevant monitoring arrangements?
- d) Are any modifications needed to the monitoring framework to ensure that the Plan is effective?

The Inspectors have not specifically asked about a Local Plan Review policy but, should the Inspectors find the plan sound without any amendment to the proposed housing requirement, it is important that a review policy is included. The National Planning Policy Framework ('NPPF') is clear that plans submitted for examination against the 2023 version that are proposing to meet less than 80% of their local housing need, will be required to undertake an early review under the new plan system. However, there are not mandatory timescales for this.

Although we acknowledge that the 2023 NPPF and standard method is the correct version to examine the plan against, it is still important to acknowledge that the emerging plan is only seeking to deliver 40% of the 2024 requirement (651 dwellings per annum). This is a significant difference. SSDC should therefore be required to produce a new Local Plan that accords with the revised standard method at the earliest opportunity.

Taylor Wimpey request that an early plan review policy is added to the Local Plan which sets out clear timescales of when the early review should be in place. It is important for housing delivery in the District that timescales are included and there are mechanisms in place to ensure the review is undertaken and a new Local Plan adopted as soon as possible.

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We draw the Inspectors' attention to the Spelthorne Local Plan Examination where the Inspectors have sought to include specific dates for the submission of the new plan. A copy of the draft policy is appended to this submission (Appendix 1).