

# **South Staffordshire Local Plan Review Examination**

Hearing Statement for Matter 4: Development Needs and  
Requirement

Representor: Miller Homes

Representor Reference: AGT24-030-03

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## Document Management

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# 1. Introduction

- 1.1. Pegasus Group is instructed by Miller Homes to respond to the South Staffordshire Local Plan Examination: Matters, Issues and Questions produced by the Inspectors appointed to hold an independent examination of the South Staffordshire Local Plan Review 2023–2041 (the Local Plan).
- 1.2. Miller Homes are promoting 23ha of Green Belt land for development, located to the south of Holly Lane, Great Wyrley. The land comprises agricultural fields set across two parcels, that lie either side of the railway line (**Figure 1.1**).
- 1.3. Great Wyrley is a highly sustainable Tier 1 settlement which is a suitable location for Green Belt release and housing growth. The land is appropriately 1.2km (15-minute walk) from Landywood railway station which offers regular services to Walsall and Birmingham, which are authority areas which have significant unmet housing needs.
- 1.4. The entire landholding is available, suitable, and deliverable / developable and would form a logical and sensitive extension to the Tier 1 settlement. The north-eastern part of the landholding is allocated for development in the Local Plan and is referred to as Site 536a Land off Holly Lane. The remainder of the landholding is also suitable for allocation.

**Figure 1.1: Miller Homes Landholding**



- 1.5. This Hearing Statement relates to **Matter 4: Development Needs and Requirement** and the following question:
  - Question 5: The housing requirement includes an additional 640 dwellings to contribute towards the unmet needs of the Greater Birmingham and Black Country Housing Market Area. Is this justified? If not, what should the figure be and why?



- 1.6. This Local Plan has been brought forward under the December 2023 version of the NPPF, and references throughout this Hearing Statement are to that version of the NPPF unless expressly indicated otherwise.

## 2. Matter 4: Development Needs and Requirement

### **Issue 1: Whether the identified future housing development need and requirement set out in the Plan are justified, effective and consistent with national policy.**

**Question 5: The housing requirement includes an additional 640 dwellings to contribute towards the unmet needs of the Greater Birmingham and Black Country Housing Market Area. Is this justified? If not, what should the figure be and why?**

- 2.1. The Council have determined that the significant housing shortfall across the Greater Birmingham and Black Country House Market Area (GBBCHMA) is an exceptional circumstance for Green Belt release at the districts most sustainable settlements with the best sustainable transport links to those authorities in need<sup>1</sup>.
- 2.2. The first Publication Plan proposed to make a 4,000-home contribution towards the unmet housing needs the wider GBBCHMA and included Green Belt release at Tier 1 and Tier 2 settlements and the open countryside.
- 2.3. This Plan now proposes to make a 640-home contribution towards those unmet needs and includes Green Belt release at Tier 1 settlements.
- 2.4. However, there remains to be available land at Tier 1 settlements which is not proposed to be released from the Green Belt, such as the remainder of the land being promoted by Miller Homes. This land could contribute towards the unmet housing need of the GBBCHMA but is omitted from the Local Plan.
- 2.5. Green Belt release from Tier 1 settlements has been limited by other constraints<sup>2</sup>. However, we dispute that there are constraints that render the remainder of the land being promoted by Miller Homes unsuitable for housing allocation as fully set out in the Regulation 19 representations<sup>3</sup>.
- 2.6. For example, the only difference in constraints between Site 536a and the land to the west, is the proximity to the Grade II Listed Landywood Farmhouse. It is clearly set out in the Regulation 19 representations that the potential for harm cause by the development in the west could only be less than substantial, which could be mitigated by the layout, screening, and provision of open space to further lessen or remove harmful impact.
- 2.7. On this basis it is considered that more land that is being promoted could be released from the Green Belt, and a higher contribution could be made towards unmet housing need, and as such we object to the 640-home contribution.

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<sup>1</sup> EB16, para 4.6

<sup>2</sup> EB20

<sup>3</sup> [https://www.sstaffs.gov.uk/sites/default/files/2024-12/agt24-030-03-15\\_pegasus\\_group\\_for\\_miller\\_homes\\_rep.pdf](https://www.sstaffs.gov.uk/sites/default/files/2024-12/agt24-030-03-15_pegasus_group_for_miller_homes_rep.pdf)

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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