

South Staffordshire Local Plan Review

Examination in Public

Hearing Statement for Matter 3

On behalf of Richborough

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1. INTRODUCTION

- 1.1. Pegasus Group is instructed by Richborough 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 Plan).
- 1.2. This Statement relates to Matter 3 and its respective issues and questions as identified by the Inspectors.
- 1.3. Pegasus Group previously submitted representations in response to the Reg 19 Publication Plan in May 2024, the superseded Reg 19 Publication Plan in November 2022, the Preferred Options consultation (Reg 18) in November 2021, the Spatial Housing Strategy and Infrastructure Delivery consultation (Reg 18) in October 2019, and the Issues & Options consultation (Reg 18) in October 2018. This Hearing Statement should be read alongside our representations.

2. MATTER 3: VISION AND STRATEGIC OBJECTIVES

Issue 1: Whether the Vision and Strategic Objectives for South Staffordshire are justified, effective, consistent with national policy, and positively prepared.

1. Is the Vision of the Plan for South Staffordshire ambitious, and yet realistic in terms of its scope and deliverability?

- 2.1. No. The vision should refer to delivering housing and economic growth, with these being key to the achievement of sustainable development, as highlighted in Paragraph 8 of the National Planning Policy Framework (NPPF). In order to ensure that the vision is positively prepared and consistent with national policy, which emphasises the importance of planning to meet an area's objectively assessed need, and significantly boosting the supply of homes, it is imperative for reference to be made to this, and for the vision to refer to the pivotal role South Staffordshire can play in accommodating unmet need from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), in line with the Duty to Cooperate. Aspiring to meet the pressing need for homes, both within South Staffordshire and in neighbouring authorities, would bolster the vision and make it far more ambitious, aligning with national policy and supporting Government aspirations to deliver 1.5 million homes over this parliament.
- 2.2. In terms of its scope and deliverability, Richborough consider the vision to be realistic. The vision is broadly the same as that presented in the adopted Core Strategy, and this has proven to be suitable and deliverable.

2. Is the plan period justified?

- 2.3. Yes. The plan period is 18 years, which is in excess of the 15-year minimum stipulated by Paragraph 22 of the NPPF.

3. Are the scope and thrust of the Strategic Objectives of the Plan sufficiently reflected in the proposed policies and site allocations so that the Vision may be realized through their implementation?

- 2.4. Richborough contend that Strategic Objective 1 lacks clarity and does not define the exceptional circumstances for release of Green Belt land as part of its strategy – it should be made clear that the need for sufficient land for growth and development over the plan period means that there are exceptional circumstances arising which have required a full and

detailed Green Belt review, to identify land that can be released from the Green Belt to meet South Staffordshire's and the GBBCHMA's growth requirements.

- 2.5. Strategic Objective 2 refers to making a "proportionate contribution towards the unmet needs" of the GBBCHMA and the wider Functional Market Area, yet Policy DS4 only commits to a 640-home contribution to meet this need, down from 4,000 in the previous Reg 19 plan (November 2022). As set out in Richborough's previous representations, and in their Hearing Statement on Matter 4, we contend that the Local Plan should make a greater contribution towards accommodating the unmet needs of neighbouring authorities, particularly those in the Black Country, and this should be reflected in Policy DS4 and the spatial distribution of allocations, to better reflect the aspirations of Strategic Objective 2 in this respect, in ensuring that a truly proportionate contribution is made.
- 2.6. Strategic Objective 2 also makes reference to focusing growth in the district's Tier 1 settlements. However, to achieve balanced and sustainable growth across the district, it is imperative that a range of sites are allocated for housing to ensure a continuous housing supply to meet not only the district's but also the wider HMA's housing need over the plan period. South Staffordshire is in a prime position to contribute towards unmet needs given that it has a contiguous border with the West Midlands conurbation. Greater recognition should be given to Tier 2 and Tier 3 settlements as well as sites which relate well to urban areas of adjoining authorities and can benefit from the sustainability of these locations. This will also ensure that Strategic Objective 2 better reflects the proposed spatial strategy for South Staffordshire, with does allow for growth in locations beyond Tier 1 settlements, and vice versa in Policy DS5. This is discussed further in Richborough's Hearing Statement on Matter 5.
- 2.7. There are no further comments on the Strategic Objectives with respect to the MIQs, and it is otherwise considered that their scope and thrust are reflected in the proposed policies and allocations to an acceptable degree.

4. Are the objectives of the Plan clearly set out and are these measurable?

- 2.8. No comment.

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