

South Staffordshire Local Plan Review

Examination in Public

Hearing Statement for Matter 5

On behalf of Richborough

Representor Ref: AGT24-030-05-02

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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 5 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 Pegasus Group previously submitted representations in response to the Reg 19 Publication Plan in May 2024, the superseded Reg 19 Publication Plan in November 2022, the Preferred Options consultation (Reg 18) in November 2021, the Spatial Housing Strategy and Infrastructure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 5: SPATIAL STRATEGY

Issue 1: Whether there is a clear Spatial Strategy which is justified, effective, and consistent with national policy.

1. How was the settlement hierarchy derived? When qualifying your answer, is the methodology used to determine the hierarchy appropriate and sufficiently robust?

- 2.1. The settlement hierarchy is informed by the Rural Services and Facilities Audit Study 2021 (Doc Ref **EB15**). This assessed access to services and facilities, namely convenience stores/supermarkets, community facilities, retail centres, employment locations, education facilities, and public transport, scoring each settlement depending on its accessibility to these. A description was developed for each tier of the hierarchy, and this assisted in categorising settlements. Whilst there are a number of limitations, including the lack of a capacity analysis, no consideration of constraints which may affect suitability for development, and the use of static data, meaning that conclusions may not reflect recent changes or developments in the area, potentially leading to outdated conclusions, and, crucially, the fact that it does not consider the edge of the West Midlands conurbation, parts of which are more sustainable than many of the district's settlements; it is considered that the methodology is generally appropriate and sufficiently robust for the purpose of establishing a hierarchy of the district's settlements, which is broadly consistent with the previous settlement hierarchy set out in the 2012 Core Strategy (paragraph 4.8).

2. How has the level of development anticipated in different settlement categories been derived? Does the settlement hierarchy appropriately reflect the role and function of these settlements?

- 2.2. The Spatial Strategy Topic Paper (Doc Ref **EB14**) sets out the various growth options which SSDC considered. Option I is selected as the preferred spatial strategy, and the reasons for this are discussed in response to question 3(b) below. Option I directs growth to Tier 1 settlements, and thus Green Belt release is restricted to these settlements, with two strategic allocations which will deliver 1,374 dwellings. This is followed by 914 homes in Tier 2 settlements, 228 homes in Tier 3 settlements, 30 homes in Tier 4 settlements, 81 homes south of Stafford, and 194 homes in other locations and Tier 5 settlements. This is considered to be appropriate, although Tier 2 and 3 settlements could accommodate more housing to meet a higher housing requirement which will provide a greater contribution towards accommodating unmet needs in the GBBCHMA (see Richborough's Hearing Statement on Matter 4), given the sustainability credentials of these settlements, as highlighted in the Rural

Services and Facilities Audit Study 2021. In some instances, this would necessitate Green Belt release in these locations. Overall, the settlement hierarchy is considered to reflect the role and function of the settlements.

3. In terms of the distribution of housing and employment distribution across the plan area:

- 2.3. a) Is it clear how and why the preferred spatial strategy has been selected?**
- 2.4. Section 5 of the Spatial Strategy Topic Paper 2024 (Doc Ref **EB14**) draws conclusions on why SSDC have selected Spatial Option I. SSDC state that this is their preferred option as they consider it to balance the need to deliver housing against the constraint placed by Green Belt land, restricting the release of this to Tier 1 settlements, which are considered the most sustainable locations.
- 2.5. b) What options have been considered for accommodating the identified development requirements in a sustainable manner? Have reasonable alternatives been considered?**
- 2.6. The Spatial Strategy Topic Paper 2024 provides a detailed assessment highlighting advantages and disadvantages for each of the nine spatial options. These are set out in Section 4 of the Topic Paper.
- 2.7. However, as set out within this Matter Statement and our Matter 4 Statements, the role the District plays in the wider GBBCHMA and FEMA must be emphasized and recognised further in Policy DS5. Spatial Strategy Option I and the large reliance on Tier 1 settlements fails to reflect the District's relationship with the adjoining areas of Dudley and Wolverhampton, where there is a high employment commuting ratio from the District to these urban areas via key infrastructure links. In addition to housing at Tier 1 settlements and to the north of the district, the spatial strategy should therefore place greater emphasis on housing growth along the eastern edge of the District, as has been highlighted in the GBBCHMA Strategic Growth Study.
- 2.8. Similarly, the protection afforded to the District's Green Belt should not be at the expense of sustainable development patterns and strategies. The Council's evidence base acknowledges that Tier 2 and 3 settlements can also accommodate housing growth to deliver sustainable development. The use of brownfield land and release of Green Belt land should be balanced to deliver a range of sites to deliver a range of housing, without, for example, overreliance on flatted developments on brownfield sites, reduced affordable housing due to

viability issues of brownfield delivery and thus failure to deliver the right housing in the right places. Tier 2 and 3 settlements are often sustainable in nature with bus services and facilities within the settlement – a train station is not the only factor that should be considered.

- 2.9. Windfall development across the Plan period is proposed at 600 homes. But windfall development does not allow for the delivery of planned strategic infrastructure nor the range of market and affordable housing which the delivery of carefully considered housing allocations can deliver.
- 2.10. Furthermore, having confirmed such a small capacity on brownfield sites, it is unclear what windfall developments will come forward to deliver housing, particularly as the SHELAA 2023 (Doc Ref EB19) identifies a substantial number of the identified brownfield sites as being neither suitable or available.
- 2.11. Further, historic windfall delivery rates have been based on densities of 35 dwellings per hectare on average. However, since the Core Strategy was adopted in 2012, matters such as 10% mandatory BNG, Nationally Described Space Standards and M4(2) and M4(3) compliant homes have been / are being introduced. These all have capacity implications for housing delivery and a lower density should be assumed, which may in turn reduce the expected windfall allowance.
- 2.12. **c) Are the areas identified for new development the most appropriate locations? Is the rationale behind choices and reasoning for conclusions clear and justified by the evidence? How have the locational needs of different sectors been addressed?**
- 2.13. The Spatial Strategy relies on over a third of the housing requirement to be delivered on land east of Billbrook and land north of Penkridge. Whilst these are sustainable locations for growth and appropriate in line with Spatial Option I and the evidence base, including the Rural Services and Facilities Audit Study 2021, sites of this scale have longer lead-in times, thus they will not address the immediate need for housing in South Staffordshire and the GBBCHMA. The SHELAA 2023 (Doc Ref **EB19**) suggests there is a lead-in time of between 4–5 years for allocations of 500–1,000 homes, which is optimistic given current delays in the planning system. There is no new evidence to suggest that lead in time has reduced and we are not aware of any planning applications before the Council for those sites. On that basis, the housing Trajectory submitted to the Examination (Doc **SST/ED7b**) should be updated to show those sites as not delivering before 2029–2030, which will impact the delivery of homes

in the earlier years of the Plan, Richborough affirm that greater recognition should be given to a range of housing sites across South Staffordshire to deliver balanced growth that can meet the short-term needs of South Staffordshire and the GBBCHMA, in order to ensure a policy and spatial strategy that is effective and justified.

- 2.14. Spatial Option I greatly reduces South Staffordshire's contribution towards accommodating unmet needs in the GBBCHMA (addressed in Richborough's Hearing Statement on Matter 4), and completely fails to reflect the District's relationship with the adjoining areas of Dudley and Wolverhampton, and the high employment commuting ratio from the district to these urban areas. The rationale for this is unconvincing, and the Spatial Strategy should place a greater emphasis on housing growth in the eastern edge of the District, as recommended in the GBBCHMA Strategic Growth Study (2018) (Doc Ref **EB28**), which forms part of the evidence base, thus such an approach would be fully justified. Small and medium-scale housing allocations here, on sites which are sustainably located, with good accessibility and public transport links, would contribute towards meeting short term needs in the GBBCHMA, closest to the source of this need.
- 2.15. The Spatial Strategy restricts Green Belt release to Tier 1 settlements. This approach is discussed in greater detail in Richborough's Hearing Statement on Matter 6. For the purposes of this Hearing Statement, whilst the importance of brownfield development is acknowledged, and strongly supported by national planning policy, it is contended that Spatial Option I overrelies on these. Such an approach risks resulting in a high proportion of development which is unable to meet a range of needs, including those of families and older people, reduced affordable housing due to viability issues, and limited outdoor amenity opportunities. This underlines the importance of adopting a balanced housing strategy which also includes greenfield sites, which may be part of the Green Belt, but which are sustainable and appropriate locations which could deliver schemes with carefully considered layouts that provide appropriate Green Belt compensatory measures.
- 2.16. **d) What roles have the Sustainability Appraisal and Viability Study had in influencing the spatial strategy?**
- 2.17. No comment.

4. In terms of highways considerations:

- 2.18. a) How have the traffic impacts of the Plan on both the local and wider highway network been assessed?**
- 2.19. No comment.
- 2.20. b) How have the traffic assessment findings shaped the plan proposals for the scale and distribution of development within the plan period?**
- 2.21. No comment.
- 2.22. c) How have cumulative highway effects of the Plan on neighbouring authorities, including Wolverhampton, been considered and addressed?**
- 2.23. No comment.
- 2.24. d) Are there any outstanding concerns from National Highways or Local Highways Authorities? If so, what are they and should they be addressed prior to the adoption of the Plan?**
- 2.25. No comment.
- 2.26. 5. Have the social, economic, and environmental impacts of the spatial strategy on neighbouring areas been identified and addressed?**
- 2.27. As discussed in response to question 3(c), the selected Spatial Strategy reduces the contribution South Staffordshire makes towards accommodating unmet needs from the GBBCHMA, contrary to the evidence base, and this is addressed in greater detail in Richborough's Hearing Statement on Matter 4.

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