



South Staffordshire Local Plan Review Examination

Matter 7: Site Allocations

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01260 288888

MATTER 7: SITE ALLOCATIONS

Issue 2: Whether the preferred housing sites are justified, effective and consistent with national policy.

- 1.1.1** This statement sets out Gladman's response to Issue 2 of Matter 7. It is submitted to the examination in respect of our land interest at Weeping Cross, which is a proposed housing allocation in the Plan (Policy SA3 – 036c).
- 1.1.2** As part of our Regulation 19 representation (AGT24019-01-01) we submitted a comprehensive assessment that confirmed the suitability of the site for allocation in the Plan. This statement should be read in conjunction with that previous submission.
- 1.1.3** On this basis we have not sought to answer every question detailed in Issues 2, nor unnecessarily repeat comments previously made. Rather, outlined below are concise responses to a select number of the Inspectors questions that we trust will assist the examination process.

Q1b: How the site contributes to delivering the spatial strategy

- 1.1.4** The proposed allocation of site 036c is wholly consistent with the spatial strategy set out in Policy DS5. The site is optimally located in a highly sustainable location, adjacent to an already established community in the town of Stafford.

Q1e: The anticipated housing capacity of the site, how this was determined and is it justified;

Q1g: How any relevant technical constraints have been assessed and whether any necessary effective mitigation is necessary;

Q1h: Whether site specific requirements are necessary and whether they are proportionate, justified and appropriately address any technical constraints or requirements of other policies in the Plan;

- 1.1.5** For the avoidance of doubt, we consider the allocation of site 036c for a minimum of 81 dwellings is justified. It would be remiss of us, however, to not recap our perspective on the Council's decision to reduce the allocation boundary of site 036c from the Preferred Options Plan (PC2 – page 149) to the current iteration of the Plan.
- 1.1.6** The decision to reduce the allocation boundary from 8ha to 3.85ha and site capacity from 168 homes to 81 homes stems from the findings of the 2022 Historic Environment

Site Assessment (EB75). This set out that development should be limited to the northern lower-lying part of the site, reflecting the potential for setting and character impacts on the non-designated designed landscape which surrounds the locally listed buildings at Acton Hill.

1.1.7 It remains our position that this outcome is disproportionate to the heritage significance of Acton Hill House/Park. Set out at Appendix 2 of our Regulation 19 representation (AGT24019-01-01; page 32) is a comprehensive Heritage Technical Note produced by CSA which responds to the points raised in the HESA. Gladman support this analysis which clearly demonstrates a sensitively designed development that preserves the extant park setting and results in no more than minimal harm to the locally listed buildings at Acton Hill can be accommodated within the larger 8ha site.

1.1.8 On this basis the site is clearly capable of delivering additional growth beyond the (minimum of) 81 dwellings currently proposed for allocation in the Plan. Gladman would request that due consideration is given to reinstating the Preferred Options Plan site allocation boundary of 8ha and 168 new homes.

Q1n: Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period.

Q1o: What is the situation with regards land ownership, land assembly and developer interest.

1.1.9 Site 036c is viable and developable. A full suite of technical reports has been completed which demonstrate that the site is not subject to any insurmountable technical or environmental constraints.

1.1.10 Gladman are promoting the site on behalf of a single landowner and no further land assembly is required to deliver the allocation. Gladman has an excellent track record in bringing forward a range of residential sites across the Midlands and can confirm that the site is already subject to significant levels of market interest. The site will be marketed expeditiously following the grant of outline planning permission.

1.1.11 We note that the latest housing trajectory (SST/ED7B – row 28) forecasts the site to start delivering in the monitoring year 2028/29. This timeframe is realistic.