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SOUTH STAFFORDSHIRE LOCAL PLAN EXAMINATION HEARING STATEMENT

MATTER 5: SPATIAL STRATEGY

On Behalf Of:
Redrow Homes

Prepared By:
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Main Contributor

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Issued By

Signature:

A handwritten signature in black ink, appearing to read 'J Pearce', with a large, sweeping underline that extends to the right.

Print Name: John Pearce

Date: 11th April 2025

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1.0 INTRODUCTION

- 1.1 We are instructed by Redrow Homes ("**RH**") to submit written responses to the Inspector's matters and issues identified in respect of Matter 5 of the South Staffordshire Local Plan examination.
- 1.2 RH are promoting land at Castlecroft Farm as a proposed residential led development to accommodate approximately 600 homes. The land at Castlecroft Farm is located in close proximity to the built up edge of Wolverhampton City and is being promoted on the basis of either meeting the needs arising within South Staffordshire or meeting unmet needs arising within the wider housing market area. Our response to the Inspector's matters and issues should be read with that objective in mind and we set out our detailed response to the questions below.

2.0 RESPONSE TO INSPECTOR'S MATTERS AND ISSUES

2.1 Question 1 – No comment

2.2 Question 2 – No comment

2.3 Question 3 – In terms of the distribution of housing and employment development across the plan area:

a) Is it clear how and why the preferred spatial strategy has been selected?

2.4 The different spatial options tested are set out in the Spatial Housing Strategy Topic Paper (CD Ref: **EB14**). This confirms that in 2018 at the outset of the preparation of the Local Plan 6 options were initially tested (options A – F). An additional option was added in 2019 (Option G) and a further two following the Council's decision to pause preparation of the Local Plan in light of the impending publication of what became the 2023 Framework. Following this, Options I and H were added.

2.5 Options I and H were added following the publication of the 2023 Framework and the Council's subsequent decision to reduce the contribution it was proposing to make to meet the unmet needs of the HMA from 4,000 to just 640. The way these options are worded infer more how the development is to be accommodated rather than a spatial option to contribute to our understanding of what is the most sustainable approach to delivering the housing requirement identified. RH question whether they are in fact spatial options or what could be considered a spatial option for development.

2.6 The Preferred Option that was ultimately selected (Option I) directly mirrors the Council's proposed strategy for meeting its own needs and the unmet needs of the HMA. This conclusion seems contrived rather than based on a thorough and robust assessment of the different options. The preferred strategy appears to have been chosen on the basis that it fits with what the Council wanted to achieve rather than it being the best and most sustainable

option to meet the development needs of the District and the HMA over the Plan Period. The Spatial Strategy Paper appears to justify the outcome rather than robustly inform the choice of option.

b) What options have been considered for accommodating the identified development requirements in a sustainable manner? Have reasonable alternatives been considered?

- 2.7 Only one option has been considered to meet the reduced housing requirement. The options presented in the Spatial Strategy Paper are not reasonable alternatives as they related to the delivering of a substantially larger quantum of development. The Council's failure to update these means that only one option has been considered with regard to the spatial distribution of this revised housing requirement, and this does not provide a sound base on which to inform the proposed strategy.
- 2.8 As noted above, 7 options were tested prior to the Council's decision to reduce its contribution to meeting the unmet needs of the HMA. The original options (A – G) were based on the delivery of 4,000 homes to meet the needs of the HMA, and do not relate to the new housing requirement, which is based on a substantially reduced contribution to the unmet need from the HMA.
- 2.9 Two options were added to the Spatial Strategy Paper following the decision to reduce the contribution to the unmet need. Of these, Option H relates to providing no contribution to the unmet housing need from the HMA and so does not include the proposed contribution of 640 dwellings to the HMA, which leaves Option I.
- 2.10 Notwithstanding our concerns with the Council's approach to Option I, as presented Option I is the only option that considers spatial distribution of the reduced housing requirement. This means that a number of spatial options have not been properly considered.

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?

- 2.11 No, we do not consider the approach is clear or justified. In particular, our comments relate to where the unmet needs of the HMA are to be addressed.
- 2.12 Having made the decision to reduce the contribution to meeting the unmet needs of the HMA to 640 dwellings, the Council has not specifically identified sites that would be suitable to meet this need, despite sites being submitted to the HELAA that are well located to the existing conurbation.
- 2.13 The Council have subsumed the 640 dwelling contribution to meet the wider needs of the HMA into its own housing requirement and do not differentiate within either its allocations or the spatial strategy for where this need is going to be met within the district. We consider that the location of these homes should be clearly identified so it can be considered whether they are appropriately located to the location that the need is arising from.
- 2.14 In a similar case, the recent Shropshire Local Plan examination and letter from the Inspectors raised concerns about how Shropshire Council were proposing to allocate specific sites that were intended to meet the needs of the Black Country. The Council had proposed to locate these homes in 3 allocated sites that bore no physical relation to the Black Country and say that part of these allocations were there to meet the Black Country's needs. The Inspectors disagreed with this approach and stated that a more appropriate solution would be to identify sites that had a better physical and functional relationship to the edge of the Black Country itself.
- 2.15 The same could be said for South Staffordshire. If the Council is proposing to make land available to meet the unmet needs of the HMA, this should be done through the identification of suitable sites that are well related to the conurbation to helping to meet the need.

- 2.16 RH contend that allocated sites that are well related to the conurbation will be a more appropriate location if the reason was for these sites to meet specific needs arising within the HMA and conurbation. As it stands, the Council has sought to pursue a spatial strategy that aligns with its objective of limiting the release of Green Belt land on allocations that would better serve meeting the needs of its own district rather than those of the wider HMA. We do not consider this a sound approach as it would not be effective in addressing cross boundary matters and that if land for housing is to be made available to meet an identified need it would be better served if that land was closer to where the need arose i.e. around the periphery of the conurbation.

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