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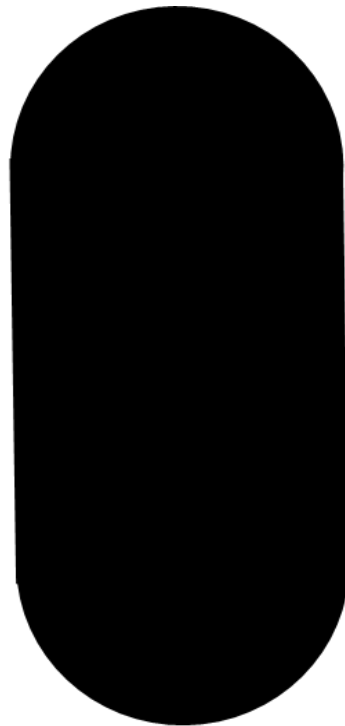
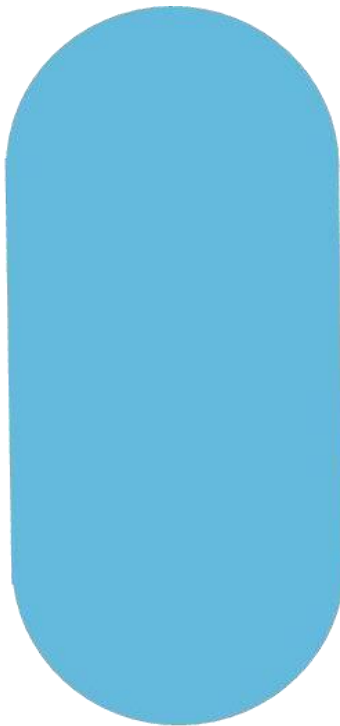
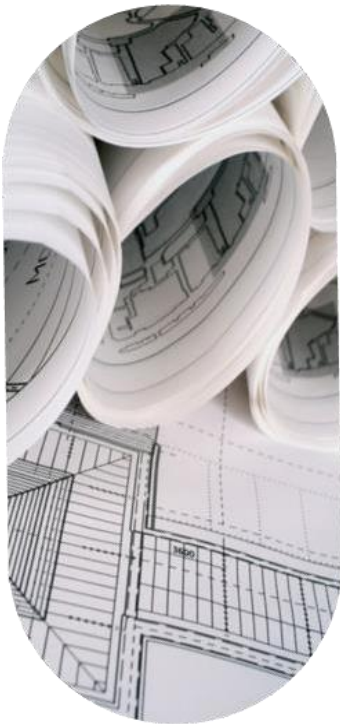
South Staffordshire Local Plan

Examination in Public

Matter 3 – Vision and Strategic Objectives

Boningale Group Ltd

April 2024



Contents

1.	Introduction.....	3
2.	Whether the Vision and Strategic Objectives for South Staffordshire are justified, effective, consistent with national policy	5

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Matter Number	Author		Checked/Approved	
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1. Introduction

- 1.1. This response to Matter 3 of the Inspectors' MIQs in respect of the South Staffordshire Local Plan (SSLP) Examination in Public has been prepared by Marrons on behalf of Boningale Group Ltd. Marrons have been instructed to appear at the Examination on behalf of Boningale Group Ltd.
- 1.2. This hearing statement should be read alongside previous representation to the Regulation 19 Consultation submitted by Marrons on behalf of Boningale Homes Ltd and should be considered in the context of support for a plan led system.
- 1.3. Acting on behalf of our clients, Marrons will attend the Matter 3 Hearing Sessions and will make further oral submission on behalf of our client. This statement outlines Boningale Group's comments in respect of Matter 3, with responses to the Inspectors' MIQs (Matter 3) set out below.
- 1.4. Boningale Group are a SME local housebuilder and land promoter based in Shropshire and are currently building out a high-quality development at 'Millfields' in Albrighton, in neighbouring Shropshire. They are actively promoting the following sites in South Staffordshire;
 - Codsall South (Appendix A)
 - Hockerhill Farm, Brewood (Appendix B)
 - Coven Road, Brewood (Appendix C)
 - Boscobel Lane, Bishops Wood (Appendix D)
 - Clive Road, Pattingham (Appendix E)
 - Bridgnorth Road, Stourton (Appendix F)
- 1.5. The Hockerhill Farm, Brewood site is subject to a live planning application for up to 100 residential dwellings. The Boscobel Lane, Bishops Wood site is subject to a Section 78 Appeal against the refusal of planning permission for up to 100 residential dwellings and a community shop.
- 1.6. In order to assist the Inspectors', the contents of this submission and the submissions made in respect of other Matters, demonstrate that the submission version of the Plan is not, in our assessment, capable of being found sound, without significant additional evidence and the identification of additional sites to accommodate housing growth over the Plan period.
- 1.7. These submissions reflect the recent position outlined by Housing Minister Matthew Pennycook and the Chief Executive of the Planning Inspectorate with regard to the continued use of 'pragmatism' in the Examination of Plans and the recognition that any fundamental issues or areas of additional work that require a pause of more than six-months in the Examination process, should indicate that a Plan is not capable of

being found sound. As such aligned with the above consideration, in the current context, we do not believe that the Plan is capable of being found sound noting that the degree of additional work we consider to be required to make the Plan sound would likely require a pause in the Examination in excess of 6-months.

- 1.8. We consider that the Sustainability Appraisal process is totally flawed, to the extent that it is unlawful, as it does not meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (“the SEA Regulations”). There has been a failure to consistently and robustly consider reasonable alternatives contrary to Regulation 12 and Schedule 2, paragraph 8. As such we do not consider that the Plan is capable of being found sound.

2. Whether the Vision and Strategic Objectives for South Staffordshire are justified, effective, consistent with national policy

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

- 2.1. Given the wider regional context, we would have hoped that South Staffordshire's Plan had been ambitious and plan for the future growth of the District and wider surrounding area.
- 2.2. As one of the main objectives of effective planning, the new Local Plan should outline the location of new homes, fully address housing demands, give the housebuilding sector stability, and lay out a positively planned long-term vision for the area in line with the NPPF. This has not happened.
- 2.3. The submitted version of the Plan has further reduced the housing targets set during the previous Regulation 19 consultation. Consequently, the plan aims to provide fewer housing units than what was already deemed insufficient. We are deeply disheartened that, amid a Housing Crisis and with the Government's heightened focus on tackling this issue, the Council is advancing a Plan that will worsen rather than alleviate the housing crisis.
- 2.4. The vision should explicitly state this.
- 2.5. The revisions to the National Planning Policy Framework (NPPF) do not necessitate a change in the Council's approach. We firmly believe that the Vision should explicitly commit to fully addressing the housing needs of South Staffordshire while also contributing to the broader growth objectives of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).
- 2.6. We would like to emphasize the importance of adopting a long-term perspective regarding future growth in South Staffordshire. The lack of effective joint working and cross-boundary collaboration among the local planning authorities (LPAs) within the GBBCHMA, including South Staffordshire, has failed to acknowledge and tackle the significant housing demand.
- 2.7. This oversight does not eliminate the housing need; rather, it exacerbates the situation as the unmet housing requirements in the region continue to escalate. The national policy landscape has increasingly highlighted the Government's commitment to resolving the housing crisis, underscored by the clear target of delivering 1.5 million homes during this parliamentary term. We believe this necessitates additional housing allocations, and the Vision and Strategic Objectives of this Plan must reflect this imperative.

- 2.8. Simply put, the Council have very clearly prioritised retaining Green Belt over the delivery of housing, despite 80% of the authority falling within the defined Green Belt.
- 2.9. The Plan as submitted is not positively prepared, justified or effective.

2. Is the plan period justified?

- 2.10. National Policy is clear in stating that Plans should have a minimum time horizon, post adoption of 15 years.
- 2.11. Notwithstanding our very serious concerns about the legal compliance and ability of the Plan to be found sound without considerable modification, with initial hearings not set to end until mid-2025, we do not consider it likely that the Council will be in a position to adopt a Local Plan until 2026.
- 2.12. We recommend that as an absolute minimum the Plan period is extended by 1 year to run until 2042. Noting however the strategic nature of some of the proposed allocations, it would be our recommendation that the Plan period is extended to 2043 and that the Council should allocate an additional 2-years worth of housing and employment land.

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 realised through their implementation?

- 2.13. No response.

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

- 2.14. No response



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