



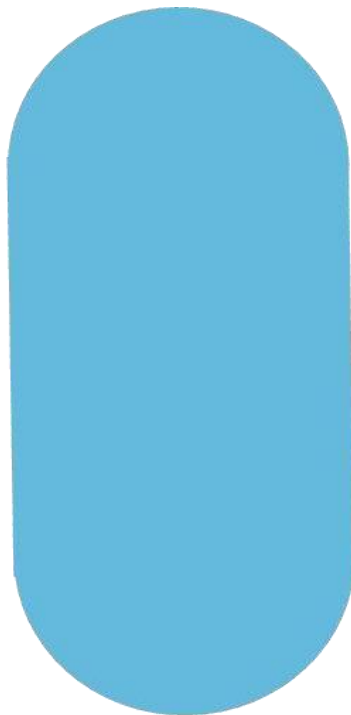
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# **Statement in Respect of the South Staffordshire Local Plan Examination**

**Matter 5 – Spatial Strategy**

**On Behalf of Catesby Estates**

**April 2025**



## 1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Marrons on behalf of Catesby Estates with respect to Matter 5 - Spatial Strategy.

## 2. MATTER 5 – SPATIAL STRATEGY

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

***Q3 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?***

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

***d. What roles have the Sustainability Appraisal and Viability Study had in influencing the Spatial Strategy?***

- 2.1 Catesby Estates consider that the proposed Spatial Strategy takes an inward, narrow view on delivering sustainable development, with a focus on growth of settlements in the District building on existing infrastructure provision and environmental constraints. The Spatial Strategy fails to recognise that there are locations in South Staffordshire on the edge of adjacent urban conurbations which are highly sustainable and will deliver a more appropriate pattern of growth.

- 2.2 The Local Plan is seeking to make a contribution to the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Whilst that contribution is limited, as set out in Catesby Estates' Matter 2 Hearing Statement, it would be expected that opportunities to deliver unmet needs would be done so bordering the HMA where such needs

have arisen, where suitable sites are available to do so, however the Local Plan does not seek to allocate any growth adjacent to the edge of Wolverhampton's urban area.

- 2.3 This is wholly contrary to the stated objective of the Spatial Strategy in Policy DS5 that “an integral part of the Strategy will be to ensure that growth is distributed to the District’s most sustainable locations”. Development at the urban edge of Wolverhampton, a City which is far superior to any settlement in South Staffordshire in sustainability terms, would clearly direct growth to the most sustainable locations and thus this omission undermines the Spatial Strategy.
- 2.4 Directing growth to the urban edge of Wolverhampton would help balance housing supply with housing needs, specific to the location in which such needs are arising, and will also help to meet the increased minimum housing requirement identified in Catesby Estates’ Matter 4 Hearing Statement.
- 2.5 In response to Catesby Estates’ 2024 Regulation 19 representations (reference AGT24-027-03) on Policy DS5, as set out in CD5, the Council identify that “the broad location of the urban fringe of the Black Country does not offer the level of public transport, particularly to employment centres in the district and surrounding areas, which are present in the District’s Tier 1 settlements and are therefore not considered to be well served by public transport, relying on limited bus services to access higher order services”.
- 2.6 This presumption is unjustified. In the case of Catesby Estates’ interest at Land off Bridgnorth Road, Wightwick (Strategic Housing and Economic Land Availability Assessment (SHELAA) Site 260), the Site is within close proximity to existing bus stops on Bridgnorth Road which provide a frequent service into Wolverhampton City Centre, with a typical journey time being around 15 minutes. More widely, the Site is evidently better located to access employment opportunities and wider facilities and services within Wolverhampton than the less sustainable Tier 1 Settlements in South Staffordshire District. This includes Wightwick Hall Secondary School and Sixth Form which is directly adjacent to the Site and is easily accessible by active travel modes via Bridgnorth Road and Bridgeway House, Bridgeway, Stratford upon Avon, CV37 6YX

Tinacre Hill (circa 500m). Castlecroft Primary School is within 1 mile of the Site, and there are a number of Local Centres offering a range of services and facilities within 2 miles of the Site.

- 2.7 Catesby Estates contend that the Spatial Strategy set out in Policy DS5 is not justified in line with NPPF Paragraph 35 b) and is thus unsound.

Reiss Sadler  
Marrons  
10<sup>th</sup> April 2025

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